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London Luton Airport Expansion

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Volume 6 Consultation Report

Consultation Report

6.02 Appendix M 2022 Due Regard Tables Part 1 of 4

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6.02 CONSULTATION REPORT

APPENDIX M: 2022 DUE REGARD TABLES – PART 1 OF 4

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Contents

	Page
A1: Introduction	1
A2: General	3
A3: Need Case, Economics and Employment	10
A4: Green Controlled Growth	131
A5: Climate change	199
A6: Noise	244
A7: Flightpaths	336
Glossary and Abbreviations	359

Tables

Table A1.1: Explanation of table heading.....	2
Table A2.1: Regard had to statutory consultation responses on General - Planning Act 2008: Section 42 – Prescribed consultees and local authorities	3
Table A2.2: Regard had to statutory consultation responses on General comments - Planning Act 2008: Section 42 – PILs.....	8
Table A2.3: Regard had to statutory consultation responses on General comments - Planning Act 2008: Section 47 – Duty to consult local community	9
Table A3.1: Regard had to statutory consultation responses on Need Case, Economics and Employment - Planning Act 2008: Section 42 – Prescribed consultees and local authorities	10
Table A3.2: Regard had to statutory consultation responses on Need Case, Economics and Employment comments - Planning Act 2008: Section 42 – PILs	70

Table A3.3: Regard had to statutory consultation responses on Need Case, Economics and Employment – Planning Act 2008: Section 47 – Duty to consult local community 104

Table A4.1: Regard had to statutory consultation responses on GCG comments - Planning Act 2008: Section 42 – Prescribed consultees and local authorities 131

Table A4.2: Regard had to statutory consultation responses on GCG comments - Planning Act 2008: Section 42 – PILs 158

Table A4.3: Regard had to statutory consultation responses on GCG comments – Planning Act 2008: Section 47 – Duty to consult local community 191

Table A5.1: Regard had to statutory consultation responses on Climate Change comments – Planning Act 2008: Section 42 – Prescribed consultees 199

Table A5.2: Regard had to statutory consultation responses on Climate Change comments - Planning Act 2008: Section 42 – PILs 224

Table A5.3: Regard had to statutory consultation responses on Climate Change comments - Planning Act 2008: Section 47 – Duty to consult local community 233

Table A6.1: Regard had to statutory consultation responses on Noise comments - Planning Act 2008: Section 42 – Prescribed consultees and local authorities 244

Table A6.2: Regard had to statutory consultation responses on Noise comments - Planning Act 2008: Section 42 – PILs 318

Table A6.3: Regard had to statutory consultation responses on Noise comments - Planning Act 2008: Section 47 – Duty to consult local community 324

Table A7.1: Regard had to statutory consultation responses on Flightpaths - Planning Act 2008: Section 42 – Prescribed consultees and local authorities 336

Table A7.2: Regard had to statutory consultation responses on Flightpaths - Planning Act 2008: Section 42 – PILs 350

Table A7.3: Regard had to statutory consultation responses on Flightpaths - Planning Act 2008: Section 47 – Duty to consult local community 354

A1: INTRODUCTION

The tables in this Appendix describe all comments received during the 2022 statutory consultation, by stakeholder type and the projects response to them. For each topic there are three tables; the first describing feedback from Prescribed Consultees (some of whom are also Persons with an Interest in the Land (PILs) and are noted as such); the second for feedback from PILs and the third for responses from community consultees.

The following topic tables are included in this appendix, which has been divided into three volumes:

A2: General

A3: Need Case, economics and employment

A4: Green Controlled Growth

A5: Climate change

A6: Noise

A7: Flight paths

A8: Fleet mix

A9: Air quality

A10: Local Environment

A11: Design

A12: Open space/Wigmore Park

A13: Impact on local communities

A14: Surface Access

A15: Compensation Policies, Measures
and Community First

A16: Construction

A17: Planning

A18: Consultation

The table headings are explained in the table below.

Table A1.1: Explanation of table heading

Table Header	Key	Description
PC	Prescribed Consultee	Organisations identified as Prescribed Consultees under the Planning Act 2008: Section 42 – Prescribed consultees and The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Schedule 1
LA	Local Authority	Local authorities as prescribed under Section 43 of the Planning Act 2008
PIL	Persons with an Interest in the Land	Persons with an interest in the land as prescribed under Section 44 of the Planning Act 2008
CC	Community Consultee	Community Consultees with whom the Applicant has a duty to consult as prescribed under Section 47 of the Planning Act 2008
No. CC	Number of Community Consultees	Count of Community Consultees
No. PIL	Number of Persons with an Interest in the Land	Count of Persons with an Interest in the Land
C	Change	Describes whether there has been a change to the project in response to the comment

A2: GENERAL

Table A2.1: Regard had to statutory consultation responses on General - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
GN.1.1	The issues that remain to be addressed continue to be of a scale that the County Council's position remains as articulated in its response to the first statutory consultation, as follows: 'Unless and until there is evidence to demonstrate, and mechanisms to ensure, that the Airport can grow and be operated in a responsible manner, in the spirit of the Government's aspiration for a partnership for sustainable growth set out in Aviation 2050, which contains its environmental impacts to within prescribed acceptable and agreed limits that are enforceable, can achieve an overall betterment in the amenity and health of the communities impacted by it – both immediate and further afield, and can adequately provide for the surface access needs required of it, the County Council has an in-		Hertfordshire County Council	1	The Proposed Development is being brought forward in the context of Government policy which supports airports making best use of their runways because of the economic benefits of air transport, as set out in the Need Case [TR020001/APP/7.04] . The airport is central to the local economy and is an important connectivity asset for the broader region it serves, including the Oxford-Cambridge Arc. It also supports regeneration and levelling up in Luton and neighbouring areas, where levels of deprivation are above average. To maintain its connectivity and significance across the economic region, the airport must address its capacity constraints. Without additional capacity the airport will not be able to accommodate any further growth in demand in the future. This would limit its ability to support wider economic growth across the sub-region.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>principle objection to growth of the Airport. This evidence does not currently exist.'</p>				<p>The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport. As such, it has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the GCG Explanatory Note [TR020001/APP/7.07] submitted as part of this application for development consent.</p> <p>Regarding environmental impacts associated with the Proposed Development, the Environmental Statement (ES) [TR020001/APP/5.01] submitted with this application for development consent, provides assessments of a</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					wide range environmental effects, including benefits and disbenefits. It will be for the Planning Inspectorate to consider the balance between the costs and benefits of the Proposed Development in providing its recommendation to the Secretary of State, based on the evidence submitted with the application.	
GN.1.2	This Council carried a motion on 23 February 2022 that Dacorum Borough Council “strongly opposes Luton Airport’s further planned expansion, from 18 million passengers per annum to 32 million passengers per annum by 2040, with the resulting negative impacts of increased noise, emissions and surface transport. This disproportionately impacts the Watling Ward villages in Dacorum, and more widely our Borough and much of Hertfordshire. Given National Climate Change goals, air travel awareness, and noise and environmental pollution levels, it cannot be justified. This cannot go unchallenged and so Dacorum		Dacorum Borough Council	1	Please refer to the response to Ref GN.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Borough Council will therefore commit to oppose the expansion of the airport at every opportunity.”					
GN.1.3	Dacorum Borough Council (DBC) strongly opposes the proposal to expand LLA from 18 million to 32 million passengers per annum (mppa). DBC also strongly considers that no application for a Development Consent Order (DCO) should be submitted to the Planning Inspectorate for determination. Our objection is on matters both of principle and detailed points of concern as set out in this response.		Dacorum Borough Council	1	Please refer to the response to Ref GN.1.1.	No
GN.1.4	We still have a number of concerns and outstanding issues, as set out below, which are yet to be satisfactorily resolved. On this basis, Central Bedfordshire Council cannot support the proposals for the expansion of Luton Airport as set out within the consultation material, and until outstanding issues are resolved satisfactorily, would object to any future applications made.		Central Bedfordshire Council	1	Please refer to the response to Ref GN.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
GN.1.5	Kings Walden Parish Council and the overwhelming majority of its residents strongly oppose expansion to 32 million passengers, the disposal of Wigmore Valley Park and the loss of valuable farmland in North Hertfordshire.	Kings Walden Parish Council		1	Please refer to the response to Ref GN.1.1.	No
GN.1.6	The proposals will negatively impact all our residents, so we strongly oppose these changes.	Slip End Parish Council		1	Please refer to the response to Ref GN.1.1.	No
GN.1.7	Royal Mail supports the proposed expansion of London Luton Airport's maximum passenger capacity to 32 million, building a second terminal and making best use of the single runway	Royal Mail Group		1	Support noted.	No
GN.1.8	We are supportive of the proposals within the consultation and look forward to working with Luton Rising as the proposals are further developed.	NATS		1	Support noted.	No

Table A2.2: Regard had to statutory consultation responses on General comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
GN.2.1	General opposition to the Proposed Development. Respondents generally opposed the Proposed Development on the basis of local and global environmental effects, the climate crisis, increased flight numbers, impacts on local communities, and the cost of the project.	102	Please refer to the response to Ref GN.1.1	No
GN.2.2	General support for the Proposed Development.	8	Support noted.	No
GN.2.3	L&G support the expansion of the Airport in principle. However, L&G considers that the concerns raised in this representation must be addressed in order to make the detailed aspects of the Airport expansion proposals acceptable and sustainable. L&G is open to discussing these matters with LLAL in order to arrive at an acceptable accommodation.	1	Support noted. Further engagement has been held with L&G since the 2022 statutory consultation.	No
GN.2.4	LLAOL fully supports the Applicant's ambition to achieve an increase in the capacity of the airport both through a phased extension of the existing terminal and the addition of a new terminal, and LLAOL is keen to work with the Applicant to ensure this aspiration is achieved.	1	Support noted.	No

Table A2.3: Regard had to statutory consultation responses on General comments - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
GN.3.1	General opposition to the Proposed Development. Respondents generally opposed the Proposed Development on the basis of local and global environmental effects, the climate crisis, increased flight numbers, impacts on local communities, and the cost of the project.	1351	Please refer to the response to Ref GN.1.1.	No
GN.3.2	General support for the Proposed Development.	201	Support noted.	No

A3: NEED CASE, ECONOMICS AND EMPLOYMENT

Table A3.1: Regard had to statutory consultation responses on Need Case, Economics and Employment - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
General						
NC.1.1	In line with our position of taking a neutral stance with regard to the government's current policy support for aviation expansion in general, the CCB will not make comment on the assumptions of continued growth in consumer demand for air travel at this stage.	Chilterns Conservation Board			The Applicant notes the Chilterns Conservation Board's (CCB) current neutral stance in relation to Government aviation policy. The Proposed Development's demand forecasts are based on the methodology adopted by the Department for Transport nationally, having regard to updated input assumptions and any uncertainties, which are reflected in the range of forecasts presented in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	No
NC.1.2	Supportive of the application which meets a number of key Economic Growth aims for Stevenage which are outlined		Stevenage Borough Council	1	Support noted. A full Environmental Impact Assessment (EIA) has been	No

Ref	Comment	PC	LA	No PILs	Response	Change
	below but this must be balanced by the concerns raised by our Executive Members for Economy, Enterprise and Transport and Environment and Regeneration in that local residents should not be adversely affected by the noise, air and surface access issues that may arise through the expansion.				<p>carried out and mitigation proposed where appropriate, this is reported in the ES [TR020001/APP/5.01], submitted with the application for development consent.</p> <p>The impacts of the Proposed Development will be taken into account by the Examining Authority (ExA), in making a recommendation to the Secretary of State (SoS), who will make a decision in relation to the application for development consent.</p>	
NC.1.3	The promoters of the airport's expansion, and those making a decision on the development consent order must take account of, and resolve, the fundamental conflict between several elements of government policy: (a) the expansion of aviation, (b) levelling-up and addressing social and economic deprivation, (c) tackling climate change and achieving net zero carbon	Chilterns Conservation Board			Government policy is clear that it continues to support growth of aviation because of the wider social and economic benefits that it brings. This support was taken within the context of the Government's Jet Zero Strategy (Ref 1) of July 2022, which reconciles the growth of aviation with the requirement to achieve net	No

Ref	Comment	PC	LA	No PILs	Response	Change
	emissions, (d) tackling the biodiversity crisis and protecting more space for nature, and (e) promoting the conservation and enhancement of the nation's protected landscapes, including the Chilterns AONB.				zero emissions by 2050, setting out the Government's plans to secure decarbonisation of the aviation sector. The overall benefits and costs of the Proposed Development, including any environmental or social impacts, have been considered by the Applicant, with a full EIA carried out as reported in the ES [TR020001/APP/5.01] .	
NC.1.4	Pragmatically speaking, given the support for airport expansion through making the best use of existing facilities in national infrastructure policy for aviation, we fully anticipate that a development consent order for the expansion of Luton Airport will be forthcoming, despite the very obvious conflicts between the economic case for expansion of aviation, and the ongoing global environmental crises (in terms of climate change and biodiversity) that such expansion will clearly contribute towards exacerbating.	Chilterns Conservation Board			There has been no predetermined decision of the application for development consent, with the ExA tasked with considering all impacts and benefits of the Proposed Development, in its recommendation to the SoS, who will make a decision in relation to the application for development consent itself.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.5	Of more concern is the reference to the England's Economic Heartland (EEH) transport strategy. This document offers no support whatsoever for expansion at Luton Airport. The principles on which the strategy is based are around decarbonised connectivity, promoting sustainable modes of transport and reducing the need to travel, all of which objectives are anathema to the expansion of aviation. The only mentions of the airport within the strategy concern improving rail connections and delivering and expanding the DART service. The EEH strategy recognises the importance of aviation to the region's economy but expresses no view, positive or negative, on the need for expansion of the sector, only on the need to decarbonise. Referencing the EEH transport strategy in support of Luton Airport's expansion is disingenuous to say the least.	Chilterns Conservation Board			England's Economic Heartland (EEH) is one of several policy or strategy documents referred to in the application for development consent. EEH is not referenced as providing policy support for the Proposed Development but it does identify the position of Luton as a place of strategic importance within its Transport Strategy (Ref 2). No claim is made regarding the Proposed Development beyond this clear recognition of the strategic importance of the airport.	No
NC.1.6	The case for growth at Luton Airport is therefore based on estimates of future demand and	Chilterns Conservation Board			Please refer to the response to Ref NC.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	on the government's predisposition towards growth in the aviation sector generally, with the addition of a recognition of the opportunities that expansion of aviation at Luton Airport could offer towards redressing local economic issues. We do not believe that this case necessarily justifies the scale of growth proposed at Luton, especially when set in the context of having regard to the conservation and enhancement of the Chilterns AONB.					
NC.1.7	Runway Capacity Detailed operational conversations and analysis will be required throughout the phases of development to support and validate expectations on runway capacity along with methods of operation. For example, NATS understands the current airfield capacity based on operational experience and NATS ACE simulation is 34 Easterly and 33 Westerly (with the addition of eight pseudo stands). This differs from the schedule declaration	NATS		1	The need for delay absorption at the higher current declared runway capacity is understood. This is common when airports profile their hourly runway capacity declaration with hours of higher and lower movements. The future capacity has been assessed using fast time simulation and takes into account the acceptability of accumulated delays. Engagement with National Air Traffic Services	No

Ref	Comment	PC	LA	No PILs	Response	Change
	which is quoted in the consultation document which is set at a peak hourly rate of 37. This figure generates a requirement for delay absorption at the runway holding points.				(NATS) has continued since statutory consultation 2022 and will continue post-submission of the application for development consent.	
NC.1.8	The Draft Need Case includes Inset 8.7, showing the ultimate development of the airport with a full length parallel taxiway and a second parallel taxiway at the eastern end of the runway, across Rapid Exit Taxiway (RET) additions. As a result, the previous comment for the airfield layout has now been resolved. Moreover, simulation modelling scenarios have confirmed that the runway will have adequate capacity to handle the forecasted aircraft movements over the ultimate phase of the Proposed Development, as commented by WSP in 2019.		Host Authorities (Ref 3)	4	Noted.	No
Economic case / jobs						
NC.1.9	The strategic economic case for the development will need to be reviewed [prior to submission], along with further interrogation of the scale of the alleged economic		Host Authorities	4	The Proposed Development is being brought forward in the context of Government policy which supports airports making best use of	No

Ref	Comment	PC	LA	No PILs	Response	Change
	benefits resulting from the proposal were consent to be forthcoming.				their runways because of the economic benefits of air transport, as set out in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent. The benefits of the Proposed Development, including the creation of jobs and wider economic benefits arising from increased air connectivity have been updated since consultation using robust economic techniques.	
NC.1.10	The consultation endeavours to answer the question “Why grow?” by describing LLA as an “important connectivity asset” in the region thereby promoting a strategy of economic growth. DBC believes this approach to be flawed. It is incompatible both with the climate emergency and also with rebalancing economic growth in the country as a whole as envisaged by Government in its levelling up policy.		Dacorum Borough Council	1	Please refer to the response to Ref NC.1.3. With regards to the Proposed Development's consistency with the Government levelling up policy, there are many pockets of deprivation in the vicinity of the airport, with Luton identified as a priority area for levelling up. As such, the Proposed Development is considered	No

Ref	Comment	PC	LA	No PILs	Response	Change
					to be consistent with both of these policies.	
NC.1.11	<p>There appears to be a linear relationship drawn between growth and local jobs in arriving at the forecast of 12,100 new jobs as a result of airport expansion. We consider this to be an unreliable forecast. Between 2010 and 2018 LLA experienced an increase in passengers from 8.7mppa to 16.6mppa (90% increase), however directly-employed jobs increased from 8,200 to only 10,400 (26% and which includes a proportion of part-time jobs), a figure significantly below previous forecasts.</p>		Dacorum Borough Council	1	<p>The 12,100 increase in total FTE jobs (including direct, indirect and induced jobs) was predicted at the national level, with expansion to 32 mppa on historic levels of direct on site job creation. These are not comparable and the future direct on-site job growth is broadly consistent with that seen previously.</p> <p>It is important to note that the 2010 employment figure of 8,200 jobs did not solely relate to directly related employment at the airport, but also included employment in the vicinity of</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>the airport, whether related to the airport or not. Hence, the number of directly related jobs in 2010 was overstated.</p> <p>The methodology has now been tightened to ensure that only direct airport jobs are counted in future assessments of on site employment. Further details regarding employment generated is provided in Chapter 11 Economics and Employment of the ES [TR020001/APP/5.01], submitted as part of the application for development consent.</p>	
NC.1.12	It is not unknown for developers to overstate employment claims. When the second runway at Manchester Airport was proposed the stated 55,000 jobs were subsequently reassessed to be less than 6,000. In the previous consultation for expansion at LLA, PEIR Volume 3, Appendix 13-1 contained a statement by Oxford		Dacorum Borough Council	1	The numbers quoted by Dacorum Borough Council are generally non-comparable as they include direct, indirect, induced and catalytic employment created through attracting new businesses to the broader local area. Growth of the airport will, in turn, act	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Economics Forecasting that “we estimate and forecast the economic contribution of LLA but we do not make any assessment of the extent to which the contribution identified will be additional to what would have occurred in the absence of its future development.” The view appears to be that much of the forecast economic growth may happen regardless and independent of the proposals for expansion.				<p>as a catalyst, making Luton a more attractive location for investment and other businesses to locate. This in turn helps the economy to diversify and contributes to broader economic priorities.</p> <p>As such, the total number of new jobs created in the broader area, versus those at the airport itself, should not be confused.</p> <p>Further details regarding employment generated is provided in Chapter 11 Economics and Employment of the ES [TR020001/APP/5.01], submitted as part of the application for development consent. Any displacement of activity is taken into account in the ES.</p>	
NC.1.13	No account appears to have been taken in the proposals of the potential impact of airport expansion taking spending and economic activity out of the locality and across the country. A		Dacorum Borough Council	1	It is not UK Government policy to limit outbound leisure travel from the UK. The Government has stated previously in the Aviation Policy Framework (2013)	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>more sustainable alternative strategy would limit numbers travelling, retain local spend and create more local work and employment opportunities and thereby assisting in the fight against climate change.</p>				<p>(Ref 4) <i>“that the evidence available to us does not show that a decrease in the number of UK residents flying abroad for their holidays would have an overall benefit for the UK economy.”</i> This highlights the vital role outbound tourism plays in strengthening quality of life in the UK, underpinning the UK’s attractiveness as a place to live and work. In this context it is important to note that over 50% of passengers at the airport in 2019 were travelling to visit friends or relatives.</p> <p>The impact of outbound leisure travel has not been assessed because it was excluded from the scope of the EIA. This was agreed with the Planning Inspectorate, which is the body responsible for examining the application (on behalf of the Government) and for making</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>a recommendation to the Secretary of State as to whether consent should be granted for the Proposed Development.</p> <p>It should also be noted that inbound tourism through the airport, is an important economic driver and brings significant economic benefits to Luton, the broader region and the UK generally.</p> <p>Further details regarding any potential tourism deficit from the Proposed Development are included in the Need Case [TR020001/APP/7.04], submitted alongside the application for development consent.</p>	
NC.1.14	We recognise that Luton Airport is a major economic driver in an area that has substantial and persistent pockets of deprivation in need of “levelling up.” We welcome the substantial job creation		Central Bedfordshire Council	1	<p>Support noted.</p> <p>As Luton has been identified as a priority area for levelling up, there is an identified need to grow the number of local jobs to maximise the benefits of the Proposed Development for residents.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.15	For the economic impact of the airport, the Draft Need Case follows a similar approach and assesses the economic impact of the Proposed Development to Luton, the Three Counties and the Six Counties. There is also mention on the Enterprise Zone adjacent to the airport. However, The Draft Need Case consists of a high-level analysis and as a result, the local authorities in close vicinity of the airport are not examined and any potential traffic congestion during peak hours is not considered, as it was noted in 2019.		Host Authorities	4	Full details of the employment generated in each local authority area are provided in Chapter 11: Economics and Employment of the Environmental Statement [TR020001/APP/5.01] . Regarding surface access congestion, the Transport Assessment [TR020001/APP/7.02] submitted as part of the application for development consent assesses the impact of the Proposed Development across a wide scale and focuses on areas where a significant impact is recorded and where mitigation is required. It will also focus on key junctions in the vicinity of the site as agreed through the modelling scoping exercise.	No
NC.1.16	Finally the Draft Need Case also considers two development scenarios with regards to "future impacts", which are the Core Planning Case and the Without		Host Authorities	4	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Development Case, which have the same characteristics as the comment on the 2019 review.					
NC.1.17	The general economic benefits that expansion of the airport would bring to both East Herts residents and the wider Luton, Bedfordshire and Hertfordshire areas are supported in principle.		East Hertfordshire District Council	1	Support noted.	No
NC.1.18	[Milton Keynes Council] recognises the important role of Luton Rising in providing both air passenger transport capacity to Milton Keynes, as its closest major international airport as well as employment opportunities to the wider catchment region. We believe the expansion will create a positive impact on the economy within the region creating more jobs for the residents of Milton Keynes.		Milton Keynes Council		Support noted.	No
NC.1.19	It is acknowledged that the airport is a major source of employment within Luton itself and areas beyond and that the proposals will create additional employment (said to be an increase of 6,300 jobs in Luton; 8,600 in the 3		St Albans City and District Council		Please refer to the response to Ref NC.1.2.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	counties and 15,000 in the UK). However, those benefits are not considered sufficient to outweigh the significant environmental impacts that are likely to arise to nearby residents including within the St Albans District.					
NC.1.20	The expansion will lead to improved connections to a number of global cities, which will further benefit businesses in Stevenage and the UK to remain competitive in a global market.		Stevenage Borough Council	1	Support noted.	No
NC.1.21	London Luton Airport is also an essential asset in supporting local recovery and growth following the pandemic for Stevenage's highly enterprising and innovative economy. Stevenage supports a great location to start and grow a business and is home to a number of sectors including aerospace, space science, creative industries and ICT and the airport is crucial for these businesses to access new international markets to support further growth.		Stevenage Borough Council	1	Support noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.22	Stevenage Borough Council recognises the value of the airport in terms of its direct and indirect economic benefits and appreciates the potential economic benefits that expansion of the airport could possibly bring to both the residents of Stevenage and the wider Luton, Hertfordshire and Bedfordshire areas. The ready local availability of an international airport is valued by both the business community and the residents of Stevenage. However, it is important that these economic gains are shared throughout the area.		Stevenage Borough Council	1	Support noted.	No
NC.1.23	The development will unlock existing infrastructure to introduce and deliver improved connectivity through the DART to the Airport from London along with new employment space including quality office space, retail space and hotel provision to support local businesses and their supply chain as well as those who invest in the area and are supported by		Stevenage Borough Council	1	Support noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	a supply chain of nearby businesses.					
NC.1.24	The expansion will support further levelling up by supporting significant labour market benefits through employability support for Stevenage households who are not working and those that have no qualifications. This would ultimately benefit a number of Stevenage residents from a number of deprived wards to access wider employment opportunities resulting from the expansion.		Stevenage Borough Council	1	Support noted.	No
NC.1.25	The expansion of the airport will also grow the airport as a catalyst for leading on green technology, research and finance and go towards delivering a sustainable, prosperous and healthier future for the wider community.		Stevenage Borough Council	1	Support noted.	No
NC.1.26	The expansion will support London Luton Airport being further recognised as a catalyst for influencing careers and enterprise as well as future proofing jobs in the area and		Stevenage Borough Council	1	Support noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	across the UK, in a number of sectors.					
NC.1.27	The Airport is crucial in supporting an inclusive and aspiration place to work and one which shapes the local skills landscape to support quality jobs and inclusive employment for all.		Stevenage Borough Council	1	Support noted.	No
NC.1.28	The expansion would support direct jobs at the airport, including check in-facilities, security, baggage handling, food and beverage and retail facilities roles, as well as direct operational jobs at the airport through the different phases of construction. It would also support indirect jobs through its supply chain, including organisations supplying works, goods and services to the airport and further open up opportunities for businesses in Stevenage who would support this element.		Stevenage Borough Council	1	Support noted. For further information on the economic benefits, see Chapter 11 Economics and Employment of the ES [TR020001/APP/5.01].	No
NC.1.29	There will also be opportunities for Stevenage businesses to tender for contracts through Meet the Buyer opportunities at the airport. Additional jobs could also result in those being employed at the Airport and spending money		Stevenage Borough Council	1	Support noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	in the local Stevenage economy. Therefore the expansion could support a number of new job opportunities for Stevenage residents and support significant economic activity for the town's businesses.					
NC.1.30	We are surprised, given the obvious primary function of the airport, that more is not made in the justification for growth of the relationship between the airport and the potential attractiveness of the surrounding area, particularly the Chilterns AONB, for tourist-related activities as a destination. There is a passing mention on p.39 of the Brochure, but no mention of the Chilterns, or indeed any specific destination other than Luton itself, and London. Luton Airport's brand is very much pitched at people travelling to London (hence "London Luton Airport") and travelling out, mainly to short-haul destinations, for holiday and business purposes. The airport does not appear to pitch itself to potential foreign travellers	Chilterns Conservation Board			The Need Case [TR020001/APP/7.04] submitted as part of the application for development consent identifies the benefits to both the South East and East of England from inbound tourism, which is enabled by the airport, the Chilterns AONB is a tourist destination likely to benefit from this. Tourism is just one factor, in a multitude, which contributes to the need case for the Proposed Development.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	specifically as a means to visit the nationally-recognised scenically beautiful area in which it sits.					
NC.1.31	The CCB recognises Luton Airport's contribution to the national, regional and local economies. In particular, we recognise the potential for the airport's economic stimulus to help address economic deprivation issues in Luton/Dunstable and beyond, where some communities have been left behind despite the buoyancy of the economies of surrounding areas, especially in Buckinghamshire and Hertfordshire. We do not consider that the contribution to those economies necessarily justifies the level of growth proposed for the airport's expansion.	Chilterns Conservation Board			<p>There are pockets of deprivation surrounding Luton which the Proposed Development seeks to target through the ETS [TR020001/APP/7.05], ensuring residents are made aware of new jobs and are provided with the training needed to acquire them.</p> <p>Growth at the airport delivers jobs and economic benefits to Luton through its operations, which the Applicant believes more than justifies the level of growth sought. Furthermore, the improved connectivity provided by the airport as it grows, also makes Luton a more attractive location for investment and other businesses, which in turn helps the economy to diversify. Where possible, the Proposed Development seeks to minimise and</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					mitigate adverse impacts which could arise, as reported in the ES [TR020001/APP/5.01] , submitted with the application for development consent.	
NC.1.32	We do not recognise the importance that the consultation Brochure places on the contribution that Luton Airport's growth could make to either the Oxford-Cambridge Arc or the achievement of the England's Economic Heartland transport strategy.	Chilterns Conservation Board			Growth at the airport delivers jobs and economic benefits to Luton through its operations. However, the improved connectivity provided by the airport as it grows, also makes Luton a more attractive location for investment and other businesses to locate and so contributes to broader economic priorities. Please also refer to the response to Ref NC.1.5	No
NC.1.33	With regard to the former, the airport is peripheral to the Arc, geographically speaking (it would make slightly more sense if Hertfordshire was included in the Arc) and is not well-connected to the Arc's commercial or population centres, other than Luton and Bedford. Furthermore,	Chilterns Conservation Board			Oxford and Cambridge are not the only significant aspects of the arc, with the airport is the principal airport serving the central part of the Arc from Luton to Northampton and is identified on the clusters map, as included in the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	there are doubts over the government's continued support for the Arc as a growth concept in the context of its levelling-up agenda				Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	
NC.1.34	The CCB recognises and applauds the unique operation of the airport as a community venture, with the ultimate owners, Luton Borough Council, returning benefits from the airport's success into the community.	Chilterns Conservation Board			Support noted.	No
NC.1.35	Listen to local residents who know and understand the area. Put finance into developing jobs and industries outside of the airport. Maximise the potential of the airport as it is now, and the current terminal, to create new employment.	Kings Walden Parish Council		1	The development of the airport will be funded directly by the operator of the airport on a commercial basis, as such there would not be alternative for such investment in creating alternative jobs in Luton. Further information regarding funding for the Proposed Development is provided in the Funding Statement [TR020001/APP/3.03] , submitted as part of the application for development consent. Growth of the airport will, in turn, act as a	No

Ref	Comment	PC	LA	No PILs	Response	Change
					catalyst, making Luton a more attractive location for investment and other businesses to locate. This in turn helps the economy to diversify and contributes to broader economic priorities.	
NC.1.36	It is also apparent that the economic demand appraisal for the project is hopelessly optimistic.	Slip End Parish Council		1	Please refer to the response to Ref NC.1.1.	No
NC.1.37	Construction of the Proposed Development may result in both temporary and permanent effects on businesses arising from disturbance due to other environmental effects (noise, vibration, air quality, visual impacts, access interruption/isolation including employee access). Based on the preliminary residual effect assessment results from the noise, vibration, air quality, assessments, there is not considered to be an effect on employment for the Proposed Development as a whole, so no	National Highways		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	effects are expected to be caused by the works to M1 J10.					
NC.1.38	<p>A recent report by the New Economics Foundation estimates that, as a result of adjustment of the government's carbon values in September 2021, the cost of cleaning up emissions from departing aircraft have doubled. In the case of Luton Airport, this cost has risen from £2,615m to £5,231mpa, even before expansion is considered. Effectively none of the eight UK airports currently seeking expansion will now be able to meet 2050 net zero emission targets (New Civil Engineer 28/1/2022). Indeed, Leeds Bradford Airport scrapped its expansion plans on 10th March 2022. It would be in the best interests and wellbeing of the Slip End Parish community if LLAOL were to do likewise.</p>	Slip End Parish Council		1	<p>The demand forecasts have taken into account the potential for increased air travel costs, such as increased fuel prices and/or costs on carbon. A range of unconstrained demand forecasts have been adopted for assessment, taking into account the potential for cost increases in a Slower Growth case scenario. Forecasts are presented in the Need Case [TR020001/APP/7.04], submitted as part of the application for development consent.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
Forecasts						
NC.1.39	<p>DBC questions the forecasts of growth from 2017 produced by the DfT suggesting that flights will increase very significantly, that Covid-19 will merely delay the increase in demand by five years. There must be very significant doubt regarding these forecasts given the many uncertainties that the world faces at present. One certainty is that the climate emergency warrants restraint and this matter does not appear to be considered in the consultation documentation.</p>		Dacorum Borough Council	1	<p>The demand forecasts are consistent with the IATA forecasts in predicting recovery to 2019 passenger levels by 2024, in line with easyJet's comments. It is not considered necessary to review the forecasts on this account, however the forecasts have been updated to take into account new parameters in the Department for Transport's latest passenger demand modelling and Government's most recent Jet Zero approach to modelling carbon costs. Additionally, the demand forecasts take full account of Covid-19 and other factors which may be seen to impact demand, including Brexit, the war in Ukraine, the cost of living crisis, increases in aviation fuel prices and increasing concerns about climate change. Further details on the demand forecasts is</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					provided in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	
NC.1.40	We appear to be in a period of considerable uncertainty regarding demand for aviation travel. The revised modelling in the current consultation on the technical update on the government's proposed Jet Zero strategy recognises there are a number of significant uncertainties. A number of assumptions made are open to query, such as the pricing model used for CORSIA which many believe to be set too low and the predicted uptake of sustainable aviation fuels. These will be reflected in fares that passengers may pay and therefore passenger demand for travel by aircraft.		Dacorum Borough Council	1	Please refer to the response to Ref NC.1.39. The costs of carbon and/or abatement are considered within the forecasting model, which has been updated to reflect the Government's latest assumptions. Further uncertainties are reflected in the range of forecasts and sensitivity tests presented in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	No
NC.1.41	There are also questions remaining to be answered regarding possible shifts in the future to non-aviation forms of transport. The need to travel by air and the associated costs and		Dacorum Borough Council	1	Please refer to the response to Ref NC.1.39. The Proposed Development is responding to demand forecasts for air travel.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>benefits of doing so should be reassessed because of the climate emergency and other factors such as Covid-19 and the impact of increasing conflicts around the world.</p>				<p>Currently, Government is not seeking to constrain growth in air travel, as it recognises the wider economic benefits that such travel brings. With regards to non-aviation forms of transport, namely rail, existing and proposed international and domestic high speed rail routes generally do not serve the markets served by air from the airport (with domestic air services to Scotland and Northern Ireland making up only a very small proportion of total passengers). High Speed 1 and future services provided by High Speed 2, currently serve or will serve routes which have no impact on air travel demand from the airport. It is accepted by Government that rail services can compete well with aviation on journeys of around two to three hours. Beyond that, air travel remains the mode of choice (Guidance on the Protection</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>of Regional Air Access to London, DfT, 2013).</p> <p>Regarding alternatives to mainland Europe, including Paris and the new direct Amsterdam rail service, these are reflected in the baseline forecasts and provide competition in the more mature parts of the European market. This means routes such as Amsterdam are unlikely to be big drivers of growth in the long term, in any event.</p>	
NC.1.42	<p>The recent Levelling-Up White Paper reintroduces a number of elements of regional policy which have not been promoted for many years. The demand forecasts supporting the consultation proposals will be affected by national and international policy approaches to economic growth and future growth is not necessarily inevitable. This is relevant where developments have major environmental impacts which may reduce living</p>		Dacorum Borough Council	1	<p>Please refer to the response to Ref NC.1.39.</p> <p>The demand forecasts reflect that it will take some time for levelling up to fully address regional disparities.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	and working conditions for a great many people.					
NC.1.43	Government in its recent technical update consultation on Jet Zero has significantly remodelled its assumptions made on passenger demand, load rating, the uptake of newer fleet models and sustainable aviation fuels. The impact and significance of these on the modelling used for forecasting the need for expansion and impacts arising from it do not appear to have been reflected in the PEIR documentation. The impact of the revised Government modelling on the basis of the modelling assumptions made to support this application should be explained and clarified so that a truer assessment may be made of the significance of impacts upon local communities and economies that may be impacted by the proposed expansion.		Dacorum Borough Council	1	Please refer to the response to Ref NC.1.39.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.44	For this assessment, London Heathrow (LHR) and London Gatwick (LGW) airports are assumed to be constrained due to their infrastructure. The Need Case also assumes that London Heathrow will have a new 3rd runway and/or London Gatwick will have a new 2nd runway and that both airports will grow to accommodate more traffic. The Council is therefore unclear how the expansion proposals and increase in passenger numbers for Luton Airport sits with the significant growth in infrastructure and capacity assumed at both London Heathrow and London Gatwick. It is considered that aspects of the draft need case are unsubstantiated, and that additional information is required to justify the need for the planned expansion at Luton.		Central Bedfordshire Council	1	With regards to future growth, the demand forecasts underpinning the Proposed Development already take into account existing spare capacity and growth at the other London airports. The Proposed Development responds to the airport's expected share in this growth. The Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent, sets out the assumptions made regarding capacity at the other London airports and the impact of the delivery of relevant proposals and differing capacity.	No
NC.1.45	Within the forecasts, the Air Passenger Duty (APD) was referenced as one of the key air transport demand drivers. Moreover, a series of scenarios about APD were set out including		Host Authorities	4	APD is one of the cost factors included within modelling. At the time when the modelling for the Need Case [TR020001/APP/7.04] was undertaken, an APD	No

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	both increasing the value of the APD and the possibility of its waiver. It should be further explained, if and which organisation, can influence the value of the APD and if such an organisation can include London Luton Airport Operations Limited (LLAOL).				holiday post-Covid-19 was under consideration. This is no longer the case and APD is assumed for modelling purposes to remain at current levels in real terms.	
NC.1.46	The Need Case assumes that LHR will have a new 3rd runway and/or LGW will have a new 2nd runway and also both airports will grow to accommodate more traffic. The assumptions are not referenced (i.e., to a statement from the airport or published reports/news) and we commented that it could have been better to provide any data to support the produced forecast scenarios (in terms of both the timeline of the new runways and the expected increased airport capacity).		Host Authorities	4	The demand forecasts take into account growth at other airports. In any event, the demand the Proposed Development is intended to meet is largely local to Luton and surrounding areas. The relevant timings and capacity assumed are set out in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	No
NC.1.47	On a similar comment, Inset 7.3 considers various scenarios about additional runway infrastructure in LHR and LGW, but without any stated reference that could		Host Authorities	4	Please refer to the response to Ref NC.1.44.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	enhance the validation of the outputs.					
NC.1.48	"Mini schedules" are not presented, and we recommend that it would be good to have them published in order to validate the Busy Day Timetables (BDTTs).		Host Authorities	4	Busy Day Timetables are presented in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent. Further information	No
NC.1.49	The Draft Need Case also provides clarity on how "busy day timetables" were developed through the traffic forecasts to size the airport facilities more precisely. Notwithstanding this, the planning parameters and triggers that were used to define the airport terminals are not presented and their phasing could have been analysed in greater detail.		Host Authorities	4	is provided regarding the "Mini schedules" used to inform the development of the Busy Day Timetables and summary timetables are set out in the Need Case.	No
NC.1.50	Regarding the Faster Growth Case in particular, an assumption has been made around the airport's additional capacity in 2029 (LTN to reach 23mppa in 2029 as opposed to 21.6mppa,		Host Authorities	4	Further information regarding the assumptions underpinning growth scenarios, including faster and slower growth, are provided in the Need Case	No

Ref	Comment	PC	LA	No PILs	Response	Change
	according to Table 7.5). This assumption is not being used in any other scenario and is not fully explained, even though it is referenced as worstcase scenario. It may be needed to research and examine this assumption further as it may affect the overall phasing of the development if such a scenario is put forward.				[TR020001/APP/7.04] , submitted as part of the application for development consent.	
NC.1.51	It should also be pointed that even though the ONC [Outline Need Case] included a graph showing the potential phased delivery of incremental airport capacity, no similar graph has been included in the Draft Need Case. Additionally, according to the original comment by WSP in 2019, a similar graph with regards to the peak hour stand demand should have been included in order to accurately present the Proposed Development. Therefore, the comment remains valid.		Host Authorities	4	The Draft Need Case provided an explanation of the relationship between construction and the constrained assessment cases, with stand requirements set out in Table 8.2, with the associated delivery illustrated alongside. Additional graphical information is provided in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.52	It is not clear that any future demand ought, of necessity, to be met at Luton given the potential opportunities to provide growth elsewhere as part of the Governments 'levelling up' agenda. The applicants Drafts Need Case appears, therefore, to lack robustness in these respects		St Albans City and District Council		The Applicant considers that the Needs Case is robust and addresses these points. The demand the Proposed Development is intended to meet is largely local to Luton and surrounding areas. This is projected to remain the same over the longer term. The suggestion of directing airport growth to other areas under the premise of levelling up, would lead to passengers from the Luton area having to make much longer surface access journeys, leading to increased congestion and pollution. Further, in any event, Luton is a priority area for levelling up.	No
NC.1.53	Forecasting is made at a time when future demand for air travel is uncertain. The long term impacts of the Covid-19 pandemic on air travel, and also on the UK economy in general, are as yet unknown and there is no robust consideration of alternatives to growth in the light of that, nor		St Albans City and District Council		Please refer to the response to Ref NC.1.39.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	indeed in light of the current Climate Emergency					
NC.1.54	Forecasting and modelling used to justify previous expansions of the airport have subsequently been found to be unreliable and there is, therefore, reason to be cautious about the accuracy and reliability of the latest forecasting.		St Albans City and District Council		It is recognised that the airport reached 18 mppa faster than was originally envisaged at the time of the original planning application, which was granted consent in 2014. This was on the basis that 18 mppa would not be reached until around 2027/8. However, growth in demand for air travel accelerated across the UK and in the London area in particular. Any such uncertainties as to the rate of future growth in air travel demand, as they relate to the Proposed Development, have been taken into account in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent, which provides Faster and Slower Growth sensitivity tests. Overall, the forecasts are considered robust and encompass a	No

Ref	Comment	PC	LA	No PILs	Response	Change
					reasonable range within which the future growth of passenger demand at the airport would lie.	
NC.1.55	The impact of the Covid-19 pandemic, Brexit and the Climate Crisis has reduced the need and desire for more flights. People are choosing to travel less for pleasure. Business travel has declined significantly as businesses have got used to online meetings, saving time and money on unnecessary flights and hotels etc. The UK has become less attractive to European Union economic migrants so there is less demand for flights to and from these destinations	Kings Walden Parish Council		1	Please refer to the response to Ref NC.1.39.	No
NC.1.56	Although there has been recovery in aviation demand post-covid, the industry has been hit by a doubling in the cost of aviation fuel in the year running up to October 2021 (Financial Times 21/10/2010), and is now exacerbated by political instability in eastern Europe, a key market for the airport.	Slip End Parish Council		1	Please refer to the response to Ref NC.1.39.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.57	There is a reference to the fact that aviation is expected to follow the same pattern recovering from COVID-19 as similar “shock events” experienced in recent history. The impact of COVID-19 on the air transport industry has been both severe and unprecedented and it is therefore commonly accepted that a more conservative approach should be followed, based on the fact that different countries have applied (and maybe will reapply in the future if required) different travel restrictions, health protocols and border controls.		Central Bedfordshire Council, Host Authorities	5	Please refer to the response to Ref NC.1.39. It is recognised that there may continue to be short term effects related to Covid-19 (and other shock events such as the war in Ukraine and cost of living crisis) over the next few years, however over the longer term, growth in air travel demand tends to follow a more predictable trend driven largely by underlying economic performance and the cost of air travel generally.	No
NC.1.58	Further, it remains to be seen as to what level of residual demand for air travel will survive the Covid-19 pandemic.		Buckinghamshire County Council	1	Please refer to the response to Ref NC.1.39.	No
NC.1.59	The expansion of the airport comes at a time when there is considerable uncertainty as to the long term impacts of the covid-19 pandemic on both the demand for air travel and also on the UK economy		St Albans City and District Council		Please refer to the response to Ref NC.1.39.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.60	The Draft Need Case is based on out-of-date information which does not take into account the negative impact on air travel of Covid 19 and Brexit	Kings Walden Parish Council		1	Please refer to the response to Ref NC.1.39.	No
NC.1.61	[St Albans City and District Council] will seek assurances that the data submitted to the Planning Inspectorate within the DCO application is appropriate, sound and reliable. Furthermore, it will recommend to the Secretary of State that, if approved, each phase of the development (Phases 1, 2a and 2b) is contingent upon an up to date assessment that shows that the projected passenger throughput numbers; noise levels and numbers of 'next generation' aircraft and fleet mix are coming forward as predicted. The applicants modelling and forecasting should therefore be carefully considered and updated before the Acceptance stage of the DCO process.		St Albans City and District Council		The Green Controlled Growth (GCG) proposals are aimed at ensuring that growth can only proceed in line with the assessed environmental impacts. The GCG framework will ensure that the airport operates within particular "limits". Limits will be set in respect to a series of indicators, including air quality, noise, surface access and carbon emissions. The relevant "limit" will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Green Controlled Growth Explanatory Note [TR020001/APP/7.07] , submitted as part of the application for development consent. One of the GCG	No

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					<p>proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.</p> <p>Any such uncertainties as to the rate of future growth in air travel demand, as they relate to the Proposed Development, have been taken into account in the Need Case [TR020001/APP/7.04], submitted as part of the application for development consent, which provides Faster and Slower Growth sensitivity tests.</p>	
<p>Employment and Training Strategy (ETS)</p>						

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.62	The ETS suggests 'direct' provision of a 'Luton Lifelong Training Centre' but it is unclear to what degree this is a commitment.		Host Authorities	4	<p>The Applicant and the airport operator would engage with airport employers, local employment support providers, and local training providers to run a programme of engagement aimed at getting ETS Study Area residents into work at the airport.</p> <p>During construction, the work contractors will be required to consider the latest green construction techniques and consider including them as part of the construction process and the skills required to use those techniques are understood.</p> <p>During operations, the airport operator, alongside the Applicant, will seek to build on existing, proven activities to develop a jobs and skills engagement programme. This will include activities operation to help residents of the ETS Study</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Area into work at the airport and connect them with training providers who can give them the skills they need. Further details be found in the ETS [TR020001/APP/7.05] , submitted as part of the application for development consent.	
NC.1.63	In our view the ETS could do more to ensure a positive and pro-active approach such that the airport operator and other airport employers provide direct training opportunities rather than simply relying on existing institutions. We consider the 'Luton Lifelong Training Centre' should be seen as an essential element in the ETS that Luton Rising should commit to; as per our comments at first Statutory Consultation, Luton Rising should consider the approach of the Stansted Airport Employment and Skills Academy which is under London Stansted Airport's direct management and delivered in partnership with Harlow College. This initiative		Host Authorities	4	<p>Please refer to the response to Ref NC.1.62 for further details on training and skills opportunities.</p> <p>The ETS considers partnerships with local educational institutions to be an important way of developing those connections to the local community, both young people developing skills that will allow them to enter the workforce for the first time, and more experienced workers who wish to upskill and make the most of the opportunities the airport has to offer. The training</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>could link directly to subsidised sustainable travel initiatives to widen access to the airport for those seeking work as part of the approach to reducing reliance on the private car, particularly in the current era of significantly rising fuel prices, with both social and environmental benefits.</p>				<p>developed would be collaborative between the operator, airport employers and the educational institutions to ensure the local workforce is prepared for the future jobs that will be on offer. This approach also supports investing in the relationships and offer of local institutions to help build their capacity and resilience for the long-term success of their programmes.</p> <p>With regards to employment and public transport, the ETS provides details on working with the Airport Transport Forum to address transport barriers that many in the area face, to ensure the airport is an accessible place to work. The ETS aims for improved accessibility, with a focus on sustainable and active travel, in coordination with the commitments and goals embedded in the Transport Assessment</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					[TR020001/APP/7.02] and Framework Travel Plan [TR020001/APP/7.13] , submitted as part of the application for development consent.	
NC.1.64	Monitoring of the success of the ETS is left for future detail. It is clearly important that a monitoring framework is established with Key Performance Indicators (KPIs) to transparently demonstrate whether the ETS is being successful and whether the forecast benefits of the development are being delivered, including the home location of those taking up new employment at the airport to demonstrate that the socio economic benefits are being realised as forecast in the socio-economic assessment of the Proposed Development. To monitor progress and results of the committed initiatives, the ETS should include a regular monitoring process – twice yearly or yearly - as part of the governance process.		Host Authorities	4	Monitoring and evaluation is considered critical to ensuring successful implementation and benefits realisation of the ETS. The Applicant will take this into consideration in determining the appropriate monitoring, evaluation and reporting requirements for the ETS. This will occur following submission of the application for development consent, as more certainty with regards to the relevant targets will be available by this time.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.65	Request setting of specific targets in the Employment and Training Strategy, linking in to existing efforts.		Luton Borough Council	1	<p>The Applicant and the operator would be responsible for setting targets for apprenticeships, local employment, and support target groups into employment including harnessing the operator's influence over the lead contractor during construction through the inclusion of Social Value requirements. The Airport Employer Community Forum (AECF) consists of representation from the operator and airport employers. They will engage with local educational institutions and would work together to ensure targets are Specific, Measurable, Attainable, Relevant and Time-based (SMART).</p> <p>Further details on the AECF is provided in the ETS [TR020001/APP/7.05], submitted as part of the application for development consent.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.66	Although the study area covers Hitchin, Letchworth and Stevenage, most of the detailed study has been confined to Luton and it appears to be 'averaged out' by considering Hertfordshire as a whole as a comparator rather than reflecting the patchwork nature of deprivation within each district in the areas relatively close to the Airport. NHC asks Luton Rising to: Identify the most deprived communities within each district/borough and provide detail on how those communities in particular will benefit from new employment opportunities created by the airport expansion.		North Hertfordshire District Council	1	<p>The ETS [TR020001/APP/7.05], submitted as part of the application for development consent, aims to support employment and training throughout the whole study area, including Luton, Bedford, Central Bedfordshire, Buckinghamshire, Hertfordshire and Milton Keynes. More detailed analysis has been undertaken, and the summary of the analysis included in the ETS does not present all the details of specific places identified as areas of deprivation, skills needs or opportunities for engagement. The summary highlights some specific areas which are outliers or most in-need of investment, of which Luton often is an outlier or area of specific need.</p> <p>The ETS also takes into consideration the extent to</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>which the Proposed Development may negatively impact on neighbourhoods, an effect that the ETS attempts to mitigate. It is presumed that areas closest to the airport will experience greater impacts and so they receive a certain amount of additional focus.</p> <p>The ETS recognises the importance of targeting support to areas of deprivation across the full study area.</p>	
NC.1.67	The ETS could do more to ensure a positive and pro-active approach in providing training opportunities such that the airport operator and other airport employers providing direct training opportunities rather than simply relying on existing institutions.		North Hertfordshire District Council	1	Please refer to the response to Ref NC.1.62.	No
NC.1.68	Greater consideration could also be given to pump-priming and subsidising sustainable travel to the airport in order to widen the geographic area in which people		North Hertfordshire District Council	1	Please refer to the response to Ref NC.1.62.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	can travel to work sustainably and affordably. Supporting sustainable travel options and reducing dependency on car ownership is an essential policy component of 'levelling up', as well as responding to the climate emergency. Recent and expected increases in fuel and energy prices will push more people into poverty, exacerbating social divisions and reducing people's ability to access work. NHC asks LR to: Use travel time, not distance, to determine accessibility of jobs.					
NC.1.69	Whilst the proposed levels of job growth by the expansion through both the construction and operational phases are welcomed, the consultation documents currently do not go far enough in terms of targets and geographical split and simply commit to future targets for future skills and training. These should be attributed according to the impact the proposed expansion will have on those communities most highly affected and identify		Central Bedfordshire Council	1	Please refer to the response to Ref NC.1.65 and NC.1.66 regarding targets and the focusing of economic benefits on areas of high deprivation, respectively.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the economic benefits they would see as a direct result, in particular those areas of high deprivation outside of Luton such as Houghton Regis and Dunstable, especially given the projected population growth rates of Central Bedfordshire and Bedford, in particular, and currently 80% of airport employees live within the Three Counties sub-region.					
NC.1.70	The economic statistics included in the consultation draft focus primarily on Luton, these should be broadened to neighbouring authority areas and should not be governed by local authority boundaries specifically but should be based on functional economic market areas.		Central Bedfordshire Council	1	Please refer to the response to Ref NC.1.66.	No
NC.1.71	We welcome the inclusion and focus on apprenticeships given the decreasing numbers across the study area since 2015 and T-levels and these should form part of any social value requirements as well as clear geographical targets.		Central Bedfordshire Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.72	We are particularly interested to know how members of deprived communities, and/or the long-term unemployed, in Central Bedfordshire can access, and can benefit from, the economic opportunities that the airport expansion should bring. This is crucial in terms of benefits to some of our areas of higher deprivation in Dunstable and Houghton Regis for example.		Central Bedfordshire Council	1	Please refer to the response to Ref NC.1.66 with regard to access to opportunities for deprived communities and Ref NC.1.62 on details on skills and training opportunities.	No
NC.1.73	The ETS should set out how any construction and operational employment advertisements will seek to ensure they reach the local population, hard-to-reach and vulnerable groups within Initiative 4.1.		Host Authorities	4	<p>The ETS provides a framework to connect the airport, airport employers, local education and training institutions, and local communities to ensure local residents are aware of the new jobs from the Proposed Development and have access to the training required to access those jobs.</p> <p>The Applicant and airport operator actively seek regular engagement between the airport, employers, local training institutions and the local</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>community to ensure recruitment targets the local population. They will run careers fairs, expand the existing "get into airports" scheme and explore additional work placements so young people can gain airport experience. Further to this there is a commitment from the Applicant to expand outreach into the local community through engagement with community leaders and schools, so residents and students are aware of opportunities at the airport.</p> <p>The creation of the Luton Jobs and Skills Engagement Programme would include activities to help residents of the ETS Study Area into work at the airport and connect them with training providers who can give them the skills they need. These activities would be complemented by the Jobs and Training Fairs which</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					would provide multiple opportunities throughout the year to bring together employers at the airport with local education, training and employment support organisations to promote opportunities for work at the airport.	
NC.1.74	There should be a commitment to working with stakeholders to investigate how barriers to access can be overcome to ensure employment opportunities are available to all residents. The following approach could be included under Goal 3: Be an accessible place to work: Provision of bus links to rural areas; and Tackling the issue around access from the east and west which are constrained by the A505, A602 and B656.		Host Authorities	4	Regarding the provision of bus links to the airport, the Proposed Development's new terminal will increase the capacity of the airport to handle bus and coach services. Therefore, it offers the opportunity for operators to develop new services improving accessibility for parts of the airport catchment area which are not currently well served by public transport. Discussions have taken place with public transport operators and will continue as part of the Proposed Development to ensure that sufficient emphasis is placed	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>on public transport access to both terminals, including east/west access.</p> <p>Discussions with bus providers aim to increase the coverage and frequency of services to airport.</p> <p>Please refer to the response to Ref NC.1.63 regarding access to the airport generally.</p>	
NC.1.75	<p>Through training and upskilling the workforce, the expansion would also open up future opportunities to those who face social and economic barriers to employment and the ability to take up roles at the airport. With training and qualifications to improve digital skills, understanding new technologies including Artificial Intelligence and Automation, this would then meet roles where new technologies are being introduced to support efficiency and productivity. This would also help to address the shortage of STEM skills to train</p>		Stevenage Borough Council	1	Support noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	and retrain a skilled workforce fit for the 21st century and beyond.					
NC.1.76	The expansion of the airport aims to support both an unskilled project workforce and unskilled new recruits from 20 miles of Luton for the extension to the Direct Air to Rail Transit (DART) and this will also provide opportunities to local residents in Stevenage. The expansion will also provide a unique opportunity for the airport to collaborate with academia to promote a range of career choices and deliver high quality training and reskilling to support career progression and sustainable careers, whilst also addressing national skills shortages in STEM and the use of new emerging technologies.		Stevenage Borough Council	1	Support noted.	No
NC.1.77	The expansion will also enable apprenticeship opportunities to arise during the construction phase and go towards increasing the availability and take up of apprenticeships which has decreased in the last couple of years. Apprenticeship opportunities could arise across		Stevenage Borough Council	1	Support noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the airport and its supply chain. The expansion could also support T Levels to ensure young people are equipped with technical skills achieved through learning and work experience to support improvements in the skills base. Further opportunities to develop the local skills base could be through working with schools to support work experience activities and careers information and guidance.					
ETS governance / implementation						
NC.1.78	Whilst the creation of a Local Economic Development Working Group (LEDWIG) as suggested in 4.3.2 is welcomed and would bring local economic development specialists together, it is unclear as to the full remit and gravitas of this group. The way this has been described suggests it would be solely a discussion forum bringing together economic development specialists across the study area alongside the airport operator rather than a group who could drive forward and realise the economic opportunities this		Central Bedfordshire Council	1	The ETS commits the airport to supporting the aims of growth strategies from across the study area. These strategies include aims such as facilitating the creation of quality employment, upskilling the workforce and providing routes into employment for vulnerable groups. The ETS will directly support these aims with the Local Economic Development Working Group, a forum through which alignment	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	proposal presents across a broader geography and enable greater co-ordination and alignment of employment and skills activities. This should be considered and clarified.				with public sector policies and actions can be assured. This integrated approach will be key in maximising the benefits of the Proposed Development. The Applicant will consider how to provide more active coordination and engagement of employment and skills activities through this group.	
NC.1.79	The proposed governance (figure 5.1) structure of the ETS is very Luton centric and, as above, whilst the [Local Economic Development Working Group] LEDWG is welcomed, it is a standalone group which may have little influence other than aligning strategic priorities across neighbouring authority areas. It would make more sense for the Recruitment and Outreach partnership to report directly to the LEDWG in order to ensure the economic benefits are realised across all areas impacted by the expansion and the LEDWG become a steering group to		Central Bedfordshire Council	1	The goals of the ETS, the initiatives proposed within it and the governance structure intended to deliver it aim to benefit the broader area associated with the airport, including Luton, Bedford, Central Bedfordshire, Buckinghamshire, Milton Keynes and Hertfordshire. Delivering the ETS would require an appropriate governance structure which allocates resources and responsibilities to different teams and members of staff	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	oversee the recruitment and outreach opportunities.				to be managed and resourced by the Applicant and the operator. As the project progresses from construction to operation, this governance structure would evolve and grow in line with the opportunities presented by each phase.	
NC.1.80	Whilst the principle of having Community Skills Leaders and STEM ambassador liaison officer is beneficial, these should be broadened to a wider geography across neighbouring areas to ensure the opportunities are realised more widely and greater distribution of the economic benefits rather than solely in Luton as the ETS suggests		Central Bedfordshire Council	1	Key partners that the Applicant and the airport operator would work with to deliver these initiatives are expected to include businesses at the airport, further education (FE) colleges, higher education (HE) institutions, and other organisations including charities supporting training, outreach programmes, and access to jobs.	Yes
NC.1.81	It is currently unclear within the consultation draft as to the composition of the Skills Leadership Panel and we would welcome further definition to fully understand how the governance will function.		Central Bedfordshire Council	1	The Applicant will continue develop the composition of the leadership and governance of the ETS in collaboration with key stakeholders.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.82	We recommend that the document set outs responsibilities for delivering the strategy.		Host Authorities	4	The Applicant and the operator would be charged with helping deliver the ETS and setting the direction of travel and targets for employment and skills at the airport. Ultimate responsibility for the implementation of the ETS will lie with the Applicant and is discussed in further detail in the ETS [TR020001/APP/7.05] .	No
NC.1.83	The method of securing and implementing the initiatives identified should also be provided. Table 4.1 (Summary of initiatives, timeline and potential patterns) should link with the illustrative ETS governance structure stated in Inset 5.1, where each initiative could be assigned to the relevant forum(s) to aid an efficient ETS delivery.		Host Authorities	4	The Applicant will take this into consideration as it continues to refine and update the ETS post submission.	No
NC.1.84	To monitor the progress and results of the committed initiatives, the ETS could include a quarterly or yearly monitoring process as part of the governance process.		Host Authorities	4	Please refer to the response to Ref NC.1.64. The Applicant will take this into consideration as it continues to refine and	No

Ref	Comment	PC	LA	No PILs	Response	Change
					update the ETS post submission.	
ETS engagement						
NC.1.85	We welcome the proposed Draft Employment and Training Strategy (ETS). This will clearly be important to ensure that the economic benefits of the Proposed Development, on which the case for approval squarely relies, are actually delivered. We consider that further discussions with the Host Authorities are needed on this document, linking it to and aligning it with economic development strategies in the area. In their own assessment, WSP conclude that in its current form, the document contains limited details relating to the commitments, monitoring and governance processes that would be adopted by the ETS to maximise benefits arising from the Proposed Development. We would expect significant further engagement on this document.		Host Authorities	4	Please refer to the response to Ref NC.1.65 and NC.1.69.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NC.1.86	At the present time, the role of local authorities in the ETS is unclear and needs to be discussed further. Indeed, the ETS relies on significant partnership working across a wide range of stakeholders, playing in large part a facilitation role rather than seeking to directly provide new opportunities for training. The strategy places considerable emphasis on working across various existing institutions, although the HAS' economic development function appears limited to consultation through the Local Economic Development Working Group to align growth strategies with local government partners and share good practice.		Host Authorities	4		No
NC.1.87	Thank you for your comments. As you have rightly identified, the forum through which local authorities will influence the ETS is through the Local Economic Development working group.		Host Authorities	4	The Applicant fully agrees that stakeholder engagement is crucial for building a successful ETS that fulfils all of its goals, the future employment needs of the airport and the socio-economic aims of the local authorities. To this end the Applicant has been	No

Ref	Comment	PC	LA	No PILs	Response	Change
					engaging regularly with all stakeholders in the formulation of this strategy.	
NC.1.88	Any initiatives in regard to construction employment should be discussed and agreed with the authorities and stakeholders to ensure all parties are committed to the initiatives proposed and ensure the initiatives are achievable		Host Authorities	4	The ETS includes a commitment to using the procurement process to ensure that the chosen contractor makes commitments related to education and training and was informed by extensive consultation with local authorities.	No
NC.1.89	The Council recognises the potential benefits in terms of jobs and skills that the airport expansion might bring, and we would welcome opportunities to work together with Luton Rising to make the most of these opportunities.		Stevenage Borough Council	1	Noted. Engagement with Stevenage Borough Council has continued after the 2022 statutory consultation and will continue.	Yes

Table A3.2: Regard had to statutory consultation responses on Need Case, Economics and Employment comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No PILs	Response	Change
General				
NC.2.1	Concern that the Proposed Development is unnecessary. Respondents are concerned that the Proposed Development is a want rather than a need, the airport and number of passengers is big enough at present, the negative impacts of the Proposed Development will outweigh the benefits and that there is no sufficient argument in favour of the proposals.	33	<p>The airport is central to the local economy and is an important connectivity asset for the broader region it serves, including the Oxford-Cambridge Arc. It also supports regeneration and levelling up in Luton and neighbouring areas, where levels of deprivation are below average. To maintain its connectivity and significance across the economic region, the airport must address its capacity constraints.</p> <p>Without additional capacity the airport will not be able to accommodate any further growth in demand in the future. This would limit its ability to support wider economic growth across the sub-region.</p> <p>Regarding the size of the Proposed Development, the scale has been designed and benchmarked against other UK airports of similar scale and intended airline users.</p> <p>The need for the Proposed Development, and concerns regarding negative impacts outweighing benefits, will be considered by the ExA.</p>	No
NC.2.2	Concern that the Proposed Development is profit driven. Respondents are concerned that the primary motivation behind the proposals is to increase revenue for the Applicant, as well as securing future	21	<p>As a publicly owned company, working to the objectives of its shareholder Luton Borough Council (LBC), the Applicant is seeking to optimise the social and economic benefits to the town and local area of its greatest asset. The Applicant believes that the best way to achieve this</p>	No

Ref	Comment	No PILs	Response	Change
	investment into the airport and justifying the money spent so far. Profits are believed to be prioritised above the potential environmental and social harm resulting from the Proposed Development.		is by growing the airport in a socially and environmentally responsible manner to unlock the significant additional benefits to the local area which will result from that growth, whilst at the same time managing the negative environmental impacts. The Applicant has a long and successful track record of investing in the community and is committed to continuing this programme with or without the Proposed Development. Growth of the airport would allow that community funding programme to be further extended.	
NC.2.3	Concern that the general impacts of the Proposed Development will outweigh the forecasted economic benefits. Respondents are concerned that the perceived local economic benefits are being prioritised above wider negative impacts, including environmental impacts.	12	The environmental assessment process, outlined in the ES [TR020001/APP/5.01] , submitted as part of the application for development consent, takes into account the economic benefits and wider environmental impacts. The benefits and negative impacts of the Proposed Development will be fully considered by the ExA. The impacts of the Proposed Development have been assessed in the EIA and mitigations proposed as appropriate. One of the mechanisms to control impacts is GCG. Further information can be found in the GCG Explanatory Note [TR020001/APP/7.07] submitted as part of this application for development consent.	No
NC.2.4	Concern that the scale of the Proposed Development is too high and that there would be too many flights. Respondents are concerned that an increase in the number of flights will exacerbate existing negative impacts.	8		No
NC.2.5	Concern that the scale of the Proposed Development is too large. Some respondents recognise the need for growth but consider the scale of growth, both in	2	As outlined in the Need Case [TR020001/APP/7.04] included with the application for development consent, the scale of the proposed development has been	No

Ref	Comment	No PILs	Response	Change
	terms of the proposed building work and the number of passengers, to be disproportionate to the need.		assessed and subsequently sized to meet the demand forecasts.	
NC.2.6	Concern that the scale of the Proposed Development is too large.	7		No
NC.2.7	Suggest the Applicant continue to fund charities and local groups to support people in the local area.	2	<p>The Applicant has a long and successful track record of investing in the community and is committed to continuing this programme with or without the Proposed Development. Growth of the airport would allow that community funding programme to be further extended.</p> <p>In addition to the benefits associated with the Proposed Development, the Applicant is currently bringing forward (or has plans in place to bring forward), other development programmes separate to those included in the application for development consent, which would help address matters such as social justice and the green sector and other projects which directly benefit local people.</p>	No
NC.2.8	General concern that the case for the scheme needs to be revised.	1	The Draft Need Case document as consulted on during statutory consultation 2022 has been updated and is submitted as the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent.	No
NC.2.9	Respondents suggest that there needs to be a cessation or reduction in air travel, partly to reduce environmental harm. Respondents	16	It is not currently Government policy to restrict demand for air travel or the number of flights. At present, there is no indication of a change in passengers attitudes	No

Ref	Comment	No PILs	Response	Change
	suggest that; there should be less slots for take-off and landing, a change in people's attitude towards air travel needs to occur, the passenger cap should be pro-rata based from Heathrow's total passengers and larger planes should be used.		towards flying. Restrictions imposed at the airport would simply result in passengers flying from elsewhere, involving longer surface access journeys leading to congestion and additional pollution.	
NC.2.10	Concern that the need case for expansion is incompatible with the Government's levelling up agenda.	3	Please refer to the response to Ref NC.1.10.	No
NC.2.11	Suggestion that if the airport is not within existing environmental limits, no expansion should take place.	1	The Applicant proposes to use the Green Controlled Growth Approach to manage the impacts of the Proposed Development. More information is set out in Green Controlled Growth Explanatory Note [TR020001/APP/7.07] submitted as part of this application for development consent. The need for the Proposed Development and the appropriate environmental limits will be considered by the ExA.	No
NC.2.12	Support towards the Proposed Development in general. Respondents consider the proposals to be appropriate, that there is a justified need case.	2	Noted.	No
NC.2.13	Suggest that there should be a ban on night flights. Some respondents considered that this would bring the airport in line with other London airports such as Heathrow.	8	Many respondents to the consultation identified their dislike of night flights. This is reflected in our commitment to remain within existing night flight quota limits. However, it is acknowledged that there is	No

Ref	Comment	No PILs	Response	Change
NC.2.14	Concern about the impact of a 70 per cent increase in flights at night (between 11pm and 7am) and a 50 per cent increase in flights during the day.	6	<p>expected to an increase in flights in the remainder of the night noise period, particularly in the 06:00 to 07:00 period reflecting the requirement for the airlines to maximise their aircraft utilisation through the operating day.</p> <p>Notwithstanding this, the majority of people wish to fly in the daytime and airlines generally only schedule a limited number of arrivals within the night period.</p> <p>The airport also operates under limitations on night time operations, set as conditions following the application to extend capacity to 18 mppa.</p>	No
NC.2.15	GKN Aerospace is broadly supportive of the Luton Rising proposals to expand London Luton Airport and recognises the potential for an expansion to improve the prosperity and economic strength of the town.	1	Support noted. The economic benefits arising from the development are explained in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	No
NC.2.16	LLAOL strongly supports the themes outlined in the Applicant's Draft Need Case. When the impacts of the COVID pandemic have passed, the London aviation system will once again become capacity constrained and the airport is wellplaced to take a proportionally greater share of required London capacity growth, given its favourable location and catchment area, the benefits that expansion at Luton will bring to the local area, and importantly the approach to expansion outlined by the Applicant, which	1	Support noted.	No

Ref	Comment	No PILs	Response	Change
	LLAOL considers to be the most sustainable of airport expansion plans in the UK.			
NC.2.17	The UK Government has highlighted the importance of aviation for global connectivity and economic prosperity in the UK, alongside aviation's contribution to the Government's "Build Back Better" and "Global Britain" schemes. Government policy support for aviation growth is set out across numerous publications and confirmed most recently in the July 2021 Jet Zero consultation and the upcoming 'Future of Aviation Framework'	1	Support noted.	No
NC.2.18	Strong support for proposals within the Draft Employment and Training Strategy document. It is clear that robust consideration is being given by the Applicant to ensure that the proposals provide equality of opportunity to local residents in terms of training, life-long learning and sustained high-quality employment at London Luton Airport. LLAOL strongly supports this approach and is keen to be further engaged in its delivery.	1	Support noted.	No
Forecasts				

Ref	Comment	No PILs	Response	Change
NC.2.19	Concern that the demand forecasts do not take Brexit into account, or that Brexit creates uncertainty for the forecasts.	16	The demand forecasts take into account post-Brexit economic projections and a range of forecasts (such as faster and slower growth) and are presented to reflect any uncertainty. The forecasts have been updated to inform the final need case assessment and take into account more recent economic projections.	No
NC.2.20	Concern that the demand forecasts are inaccurate or uncertain. Respondents are concerned that long term demand cannot be reliably predicted, the Government aviation strategy is out-of-date, and future reductions in demand have not been taken account of.	4	The demand forecasts are based on the latest economic indicators and assessments of carbon and other costs, including the cost of living, and have been kept under review up until submission of the application for development consent. To the extent that there is uncertainty in the future demand forecasts, this is taken into account by presenting a range of forecasts as explained in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	No
NC.2.21	Concern that climate change awareness will remove or reduce the demand for air travel. Respondents believe that that more people will choose to fly less for environmental reasons, aviation will need to be restricted in the future as climate change worsens, and that Government climate change policy may impact demand in the future.	1	The Government has made clear in its Jet Zero policy that it does not consider it necessary to curtail people's ability to fly in order to meet relevant climate change commitments. There is currently no indication that climate concerns are materially slowing the demand for air travel, however the forecasts do take into account that costs associated with carbon, such as carbon permits or carbon abatement measures, will increase over time, impacting the cost of air travel and hence level of demand.	No

Ref	Comment	No PILs	Response	Change
NC.2.22	Concern that the demand forecast has not taken account of the cumulative impacts of Brexit, the Covid-19 pandemic, war in Europe, the cost of living crisis and increasing concerns about climate change.	13	The demand forecasts take full account of Brexit, Covid-19, the war in Ukraine, the cost of living crisis and increasing concerns about climate change. The demand forecasts have been refreshed prior to submission, taking into account the latest economic information. The projections used are broadly consistent with the Department for Transport's expectations for growth in air passenger demand across the UK, as published in March 2022. The extent to which there is uncertainty is reflected in the range of forecasts presented in the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent.	No
NC.2.23	Concern that global conflict will reduce the demand for air travel. Respondents are concerned about the weaponisation of fossil fuels, the impact of the war in Ukraine, supporting an industry associated with exporting military equipment and general political uncertainty.	4		No
NC.2.24	Concern that climate change awareness will remove or reduce the demand for air travel. Respondents believe that more people will choose to fly less for environmental reasons.	16	There is currently no indication that climate concerns are materially slowing the demand for air travel, however the forecasts do take into account that costs associated with carbon, such as carbon permits or carbon abatement measures, will increase over time, impacting the cost of air travel and hence level of demand.	No
NC.2.25	Concern that the increased use of digital technology and video-conferencing will reduce the demand for air travel.	4	Experience would suggest that the impact of conflicts, such as in Ukraine, tend to have a short term impact on air travel demand growth.	No
NC.2.26	Concern that the demand forecast has been overestimated or manufactured by the Applicant. Respondents are concerned that the demand forecast is unrealistic and does not take account of factors which will reduce the demand for air travel.	1	Whilst there are short term concerns regarding cost of living, evidence suggests that demand impacts from such concerns tend to be short lived Oil prices peaked at a similar level in real terms to those seen in 2010, following the Global Financial Crisis. In the long term,	No

Ref	Comment	No PILs	Response	Change
NC.2.27	Concern that the increased cost of living will remove or reduce the demand for air travel. Respondents are concerned that increased costs in household bills, taxes, food and fuel, amongst others, will result in there being less disposable income for people to spend on air travel.	13	<p>the effect on air travel demand was transient and growth resumed, as the economies recovered from the global financial crisis. Growth in air travel demand tends to follow a more predictable trend driven largely by underlying economic performance and the cost of air travel generally.</p> <p>The demand forecast already take into account the expectation that growth in business travel will be less than leisure travel, due to the use of video conferencing technologies. Recent research suggests that levels of business travel demand are recovering as Covid-19 related restrictions ease.</p>	No
NC.2.28	Concern that the Covid-19 pandemic has removed or reduced the forecasted passenger demand, which is based on pre-pandemic data.	18		No
NC.2.29	Concern that global conflict will reduce the demand for air travel.	3		No
NC.2.30	Concern that the rising costs of running the airport and the airline will remove or reduce the demand for air travel. Respondents are concerned that the rise in oil prices will lead to increased flight costs for passengers, leading to reduced demand.	10		No
NC.2.31	Concern that the demand forecasts are inaccurate or uncertain.	13		Please refer to the response to Ref NC.2.20.
NC.2.32	Concern that the forecasted demand is based on a lack of evidence, which does not justify the Proposed Development going ahead.	5	No	

Ref	Comment	No PILs	Response	Change
NC.2.33	Concern that the demand forecast is based on out of date information, which does not justify the Proposed Development going ahead. Respondents are concerned that the demand forecast does not take account of recent events and changes which have impacted the aviation industry.	7	Please refer to the response to Refs NC.2.20 and NC.2.22.	No
NC.2.34	Concern that the demand forecast has been overestimated or manufactured by the Applicant.	6		No
NC.2.35	Concern that general work and leisure pattern changes have reduced or removed the demand for air travel. Respondents are concerned that people are flying less due to the reduction of migrant workers, businesses wanting to save time and money spent on travel, and a reduction in people wanting to holiday abroad.	7	Please refer to response to Ref NC.2.22. Factors such as increased travel within the UK and flight shaming, the reduction of migrant workers, flexible working practices and businesses wanting to save time spent traveling have been taken into account, as explained in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	No
NC.2.36	Concern that the Applicant has not considered expansion occurring, or planned, at other airports, which negates the forecasted demand for the Proposed Development. Respondents are concerned that the impact of growth in UK aviation is not being considered as a whole but on an individual airport basis.	2	The demand forecasts already take into account growth at other airports. In any event, the demand the Proposed Development is intended to meet is largely local to Luton and surrounding areas. The suggestion of encouraging passengers to use alternative airports, particularly those in the north (if any such capacity exists), would lead to passengers having to make much longer surface access journeys leading to additional congestion and pollution.	No

Ref	Comment	No PILs	Response	Change
NC.2.37	Suggestion that the need case figures and models should be updated to reflect the latest factors impacting demand for air travel, including government forecasts for the UK economy, net-zero commitments, Brexit, Covid-19 and the war in Ukraine.	4	Please refer to the response to Ref NC.2.22.	No
NC.2.38	Support towards the demand forecasting, which respondents believed to be well justified and to reflect the likely return and increase in demand for air travel. However, respondents maintain concerns on potential negative impacts to the environment.	2	Noted.	No
NC.2.39	Concern that the Covid-19 pandemic has removed or reduced the forecasted passenger demand, or that the full impact of the pandemic on demand is not yet known. Respondents are concerned that it is an inappropriate time to invest in aviation, the potential impact of future pandemics is not known, and that demand forecasts are based on pre-pandemic data.	1	Please refer to the response to Ref NC.2.22.	No
NC.2.40	easyJet is concerned that the development consent Order sets the principle of growth from 18 to 32 mppa at a time when there is already sufficient capacity available in London Luton Airport and other London Metropolitan area Airports. The COVID-19	1	Please refer to the response to Ref NC.1.63.	No

Ref	Comment	No PILs	Response	Change
	<p>pandemic has had, and continues to have, a devastating impact on the air transport industry. Right now, capacity substantially exceeds depressed demand for flights, and we expect this to be the case for some time. IATA forecasts that European air travel will not fully recover to 2019 traffic levels until 2024. Therefore, easyJet believes that the growth threshold within the proposals should be reviewed to take this into account. Clearly, the cost of the DCO proposals and associated terminal / apron expansion must be considered in this context.</p>			
NC.2.41	<p>easyJet believes that Luton Rising Ltd should revisit the need to grow airport capacity to 32 mppa. While we do not oppose capacity growth in London Luton Airport, we do believe that the immediate concern should focus on improving efficiency for the benefit of its customers. Any future growth should be done so with the wider London Metropolitan area taken into consideration. Currently, there is vacant capacity in all London airports, therefore it is difficult to justify the need to expand.</p>	1	<p>The proposals seek to maximise the potential of Terminal 1, which cannot easily be substantially expanded as it is surrounded by aprons and taxiways and with limited surface access capacity in the central terminal area. Its potential is being maximised before the proposed Terminal 2 development is implemented. With regards to future growth, the demand forecasts underpinning the Proposed Development already take into account existing spare capacity and growth at the other London airports. The Proposed Development responds to the airport's expected share in this growth. This is explained further in the Need Case [TR020001/APP/7.04], submitted as part of the application for development consent.</p>	No

Ref	Comment	No PILs	Response	Change
NC.2.42	The need of the catchment area is to restore routes and frequency. We are hopeful that Luton Risings plans will be revised to acknowledge this and deliver a more sustainable growth trajectory.	1	<p>With regard to the need of the airport's catchment area for the restoration of service routes and frequency post Covid-19, growth projected takes this into account in the short term. The forecasts underpinning the Proposed Development however are significantly longer term, beyond the relative short-term issue of recovery from the pandemic.</p> <p>With regard to a more sustainable growth trajectory, a range of demand forecasts have been adopted for assessment, taking into account issues which may affect need and therefore growth. These include both slower and faster growth scenarios. These forecasts and associated sensitivity testing are presented in the Need Case [TR020001/APP/7.04], submitted as part of the application for development consent.</p>	No
NC.2.43	The proposals central growth scenarios (figure 2.3 below), taken from Department for Transport 2017 data, suggests that Heathrow, Gatwick, and Luton are currently full, which is not the case. The data also omits Southend Airport which has vacant capacity of up to 3 mppa for the London Metropolitan area. Luton Risings plans to increase capacity by 20% (from 18 to 21.5 mppa) from 2022 to 2027 seems unnecessarily high since industry forecasts suggest that 2019 traffic levels will not be restored until 2024. easyJet suggests that	1	<p>Please refer to the response to Refs NC.1.63 and NC.1.72.</p> <p>The illustrative chart included in the Consultation Brochure was provided by way of background context. Full details of how capacity at Heathrow, Gatwick and Stansted have specifically been taken into account are included in the Need Case [TR020001/APP/7.04], submitted as part of the application for development consent.</p>	No

Ref	Comment	No PILs	Response	Change
	the planned growth trajectory of London Luton Airport is revised to accommodate more sustainable capacity increases in light of pandemic recovery.			
NC.2.44	As the longstanding operator of the airport, LLAOL is well-placed to comment on the demand in the local and national aviation market. It is with this experience that LLAOL considers the Faster Growth Case passenger forecast to be a realistic scenario and so would strongly advocate that this scenario becomes the Core Planning Case within the DCO Application. LLAOL would request that the Applicant works with LLAOL to confirm forecasts to optimise the airport.	1	Engagement with LLAOL has been ongoing since the 2022 statutory consultation. Further details regarding any rates of future growth in air travel demand, as they relate to the Proposed Development, are detailed in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent, which provides Faster and Slower Growth sensitivity tests.	No
Why Luton?				
NC.2.45	Concern that the airport location is unsuitable and inappropriate for expansion, given the extensive earthworks and piling operations that will be required, with adverse environmental impacts.	2	The environmental assessment process takes into account the location of the airport and the impacts on the communities around it. The design development of the Proposed Development has fully taken into account any constraints of the site. The benefits and negative impacts of the Proposed Development will be fully considered by the ExA.	No
NC.2.46	Concern that Luton is not suitable for expansion because the airport is located within a high urban population and has already expanded beyond what the local planning authority previously thought appropriate for the current time.	1	The construction of major infrastructure like airports inevitably entails significant earthworks, use of materials, and other traditionally carbon-intensive activities.	No

Ref	Comment	No PILs	Response	Change
	Respondents are concerned that increasing the number of passengers and flights will have an excessive negative impact on local residents.		The earthworks strategy is to limit the volume of material that is taken off site and to reuse material in the permanent construction. The general philosophy is to minimise the amount of landfill materials excavated and where it is essential, to excavate landfill materials then keep as much a practical on site and reuse in the construction.	
NC.2.47	Concern that Luton is an unsuitable location for an airport in principle, let alone for expansion.	11		No
NC.2.48	Concern that other airports are better placed to accommodate growth, negating the forecasted demand for the Proposed Development. Respondents consider other airports to be better located or have more appropriate existing infrastructure to accommodate increased flights.	9	Please refer to the response to Ref NC.2.36.	No
NC.2.49	Support towards the convenience that the Proposed Development would continue to provide for local residents to enable easy access to air travel, as well as increasing the choice of flights and destinations available. Some respondents consider Luton to be more appropriate for growth than other airports.	4	Noted.	No
NC.2.50	Suggest Terminal 1 and the airport's existing facilities should be improved before, or done instead of, expanding the airport.	3	Improvements to Terminal 1 are proposed as part of the Proposed Development.	No

Ref	Comment	No PILs	Response	Change
NC.2.51	Suggestion that the use of alternative modes of transport should be encouraged or invested in, rather than meeting the demand for air travel.	1	The Proposed Development is responding to demand forecasts for air travel. Currently, Government is not seeking to constrain growth in air travel, as it recognises the wider economic benefits that such travel brings.	No
NC.2.52	Suggestion that the use of alternative modes of transport should be encouraged or funded by the airport, especially greener modes, rather than meeting the demand for air travel.	3	<p>With regards to non-aviation forms of transport, namely rail, existing and proposed international and domestic high speed rail routes generally do not serve the markets served by air from the airport (with domestic air services to Scotland and Northern Ireland making up only a very small proportion of total passengers). High Speed 1 and future services provided by High Speed 2, currently serve or will serve routes which have no impact on air travel demand from the airport. It is accepted by Government that rail services can compete well with aviation on journeys of around two to three hours. Beyond that, air travel remains the mode of choice (Guidance on the Protection of Regional Air Access to London, DfT, 2013).</p> <p>Regarding alternatives to mainland Europe, including Paris and the new direct Amsterdam rail service, these are reflected in the baseline forecasts and provide competition in the more mature parts of the European market. This means routes such as Amsterdam are unlikely to be big drivers of growth in the long term, in any event.</p>	No
NC.2.53	Suggest that the funds for the Proposed Development could be better spent or invested elsewhere. Respondents have	19	Luton Rising's significant annual investment in positive social impact is closely aligned to the Luton 2040 Vision for a place to thrive, a carbon-neutral town and where	No

Ref	Comment	No PILs	Response	Change
	suggested that the funding for the proposals could be directly invested into social justice, literacy, the green sector, the rail network, alleviating poverty, regenerating Luton town, schools, modernising homes and shops, and projects that directly benefit local people.		no-one needs to live in poverty. The Applicant wishes to provide more of this support, which will be enabled by the Proposed Development.	
Cost				
NC.2.54	Concern that the cost of the Proposed Development for the taxpayer is too high; and that LBC as airport owners will not receive a substantial return.	1	<p>The Proposed Development will proceed as demand grows, and growth will be based on the business case at the time.</p> <p>The Funding Statement [TR020001/APP/3.03], which is submitted as part of this application for development consent, sets out how the Proposed Development is fundable.</p> <p>The source of finance that will ultimately be used to support the construction cost will be determined based on prevailing market conditions and available options at the appropriate time and will depend upon a range of economic variables. The final financing solution will be subject to value for money assessment.</p>	No
NC.2.55	Suggestion that funding for the Proposed Development should come from private investment, rather than from LBC.	1		No
NC.2.56	Concern that the cost of the Proposed Development for the taxpayer is too high; and that public money should be better spent to serve local communities.	6		No
NC.2.57	Concern that no clarity has been provided on who will fund the Proposed Development.	4		No
NC.2.58	Concern regarding the poor financial track record of LBC, which respondents believe should result in the Proposed Development not going ahead. Respondents raise specific concern that LBC are already in high levels	12		No

Ref	Comment	No PILs	Response	Change
	of debt, and this should be addressed before considering further expansion.			
NC.2.59	Concern that the cost of the Proposed Development for the taxpayer is too high. Respondents are concerned that taxation will increase, public money is being put at risk or wasted, the source of funding is unclear and that there is a lack of transparency about how public money has been, and will be, spent.	1		No
NC.2.60	Concern that the cost of expansion in general is too high. Respondents are concerned that: costs will increase, the airport is already in debt, it is a waste of money, there are associated risks with the cost, the source of funding is uncertain, the current economic climate does not justify the costs, and that the money could be put to better use.	22		No
NC.2.61	Concern that the Proposed Development is an example of undue haste; and the failure to wait until the Secretary of State takes a decision to require local authorities to provide revenue provisions against high risk loans. If confirmed, this would commence in the next fiscal year 23/24 and will signal the end of the supply of cheap money to Local	1	The Proposed Development has been carefully considered over a number of years, starting in 2017 with the Applicant's Vision for Sustainable Growth and has been the subject of public consultation in 2018, 2019 and 2022. The growth plans for the Proposed Development have been considered over a 15-20 year period upon approval. The Funding Statement [TR020001/APP/3.03] , submitted as part of this	No

Ref	Comment	No PILs	Response	Change
	Authorities. The current LBC budget papers indicate that, if these provisions are adopted, they would have a material impact on LBC's already weakened finances.		application for development consent sets out clearly how the Proposed Development is expected to be funded over this time.	
Economic case/job creation				
NC.2.62	Support towards the benefits that the Proposed Development will bring to the local community. Respondents support the continuation and increase of investment into frontline services and local charities, as well as tackling poverty in the area.	5	Noted.	No
NC.2.63	Concern that the Proposed Development will not bring economic benefits and jobs to impacted communities outside of Luton. Respondents are concerned that settlements outside of Luton would suffer the same, or worse, levels of negative impacts as Luton, without experiencing the same level of benefits.	19	Please refer to the response to Refs NC.1.66 and NC.1.72.	No
NC.2.64	Concern that the Proposed Development will primarily provide low-skilled and low-paid jobs.	8	Jobs at the airport are generally higher paid than the average and it is expected that the jobs created by the Proposed Development will be the same. Further to this, the additional jobs created will help replace local jobs made obsolete by automation, with the better use of automation helping workers focus on value-added	No

Ref	Comment	No PILs	Response	Change
			<p>aspects, helping them be more productive, which leads to further higher wages.</p> <p>The ETS [TR020001/APP/7.05] recommends that the Airport Employers Community Forum (AECF) would engage with employers at the airport to encourage high standards for wages, diversity and inclusion, employee wellbeing, and supporting local employment. The AECF would work with other businesses at the airport to create a Luton Workplace Charter, which airport businesses would be encouraged to sign up to. The Charter will promote the airport's values and high working standards, or alternatively encourage and coordinate airport businesses signing up to the "Good Business Charter," developed by LBC. The Workplace Charter would be owned and managed by the AECF encouraging better inclusion practices and good working standards across the airport on issues raised through the AECF.</p>	
NC.2.65	Concern that Luton has an over-reliance on the airport to provide jobs and support the town's economy. Respondents are concerned that demand for air travel is uncertain and may not sustain long term economic growth/jobs.	7	Please refer to the response to Ref NC.2.45.	No
NC.2.66	Concern that LBC is financially over reliant on Luton airport, which poses a financial risk.	5	LBC is not the Applicant for the application for development consent.	No

Ref	Comment	No PILs	Response	Change
NC.2.67	Concern that new jobs arising from the Proposed Development will not go to local people, and that the airport will rely on a non-local workforce.	5	Please refer to the response to Ref NC.1.63.	No
NC.2.68	Concern that there are no economic benefits from the Proposed Development with regards to jobs and/or the economy, or that any benefits are limited or overstated. Respondents are concerned that predicted benefits from previous expansions have not been proved, and that there is a risk of the same happening again.	5	Please refer to the response to Ref NC.1.63. The economic benefits arising from the development are explained in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	No
NC.2.69	Concern that there are no economic benefits from the Proposed Development with regards to jobs and/or the economy, or that any benefits are limited or overstated.	13		No
NC.2.70	Concern that there is no business case for the Proposed Development and that critical costs are ignored, including the net cost of outbound tourism over inbound tourism, the cost of CO2 offsetting, high up-front capital costs and an uncertain revenue stream.	1	The demand forecasts fully take into account the cost of carbon and future increases in carbon related costs. Outbound tourism also generates benefits for the UK in terms of quality of life, productivity and making the UK an attractive place to live and work. Hence, it is not normal practice to net off the cost of outbound tourism within an economic assessment.	No
NC.2.71	Suggestion that training and upskilling opportunities should be supported and	1	Please refer to the response to Ref NC.1.63.	No

Ref	Comment	No PILs	Response	Change
	funded as part of the Proposed Development.			
NC.2.72	Suggest the Applicant should focus on creating jobs and developing skills outside of the aviation sector. Respondents suggest that the local economy could be strengthened, diversified and made more resilient by investing in other sectors including manufacturing, food production, education, rail, engineering, light industry, and the green sector (including heat pump installation, wind/solar technology and car batteries).	12	Please refer to the response to Refs NC.2.45 and NC.2.48.	No
NC.2.73	Suggestion that Luton should diversify its economy by attracting other businesses to the area, to provide more jobs, and raise the level and range of skills for local people. Respondents suggest encouraging business clusters and investing in the green sector, including green aviation.	5		No
NC.2.74	Conditional support towards the Proposed Development. Respondents recognise the benefits that growth could bring but believe that it should be dependent on; the negative impacts being mitigated.	2	The ES [TR020001/APP/5.01] submitted as part of the application for development consent sets out the proposed mitigation of negative environmental impacts from the Proposed Development.	No

Ref	Comment	No PILs	Response	Change
NC.2.75	Concern that the local economy will suffer as wealthier residents move out of the area to avoid negative impacts of the Proposed Development, which will reinforce the outcast nature of Luton and further disadvantage poorer residents.	1	It is not anticipated that residents already living in the proximity of the airport will leave as a result of the Proposed Development. Growth at the airport delivers jobs and economic benefits to Luton through its operations. The improved connectivity provided by the airport as it grows, also makes Luton a more attractive location for investment and other businesses, which in turn helps the economy to diversify.	No
NC.2.76	Support for the Proposed Development, based on concern that if no expansion takes place airlines may decide to leave Luton. This would decrease community funding available and significantly impacting on the positive work of the Voluntary, Community and Social Enterprise (VCSE) organisations.	1	Noted.	No
NC.2.77	Support the Proposed Development's contribution to the economy and the creation of more jobs.	25	Noted.	No
NC.2.78	Suggestion that the Applicant should focus on creating jobs and developing skills in the green sector.	2	Please refer to the response to Ref NC.2.48.	No
NC.2.79	Suggestion that the Applicant should support the local economy by supporting small and local businesses; the proposals need to address this in a creative way to ensure that	1	It has been estimated that the local economy will benefit significantly from the 4,500 jobs that will be created from the Proposed Development and the impact through supply chains and additional spending power. The ETS	No

Ref	Comment	No PILs	Response	Change
	local residents and businesses are not forgotten.		<p>[TR020001/APP/7.05] aims to align the Proposed Development with local growth strategies to ensure the local area maximizes from potential opportunities. To do this, a 'Local Economic Development Working Group' will be created that will help ensure that economic and employment opportunities support local growth and regeneration.</p> <p>While the ETS would encourage the facilitation of goods and services from local and small and medium enterprises, this would be subject to a Local Economic Plan, at a council level, rather than the airport itself.</p>	
NC.2.80	Ever since London Luton remained the hub of Wizz Air operations in the UK. It allows us to create more jobs to the community, directly and indirectly.	1	Noted.	No
NC.2.81	Further consistencies can be drawn between the resulting impact of expansion and the Government's "Levelling Up" agenda; Airport expansion would be an economic growth engine for Luton and surrounding areas, which contain substantial pockets of deprivation. An expanded airport will provide a significant employment and GDP boost to the area, as well as to the wider UK economy.	1	Support noted.	No
NC.2.82	Indeed, the GDP boost will stretch further than Luton and surrounding areas due to	1	Support noted.	No

Ref	Comment	No PILs	Response	Change
	Luton's geographic position and transport connections. Luton can service passengers from London, the Oxford-Cambridge ARC, the counties to the north and west of London, and the Midlands, meaning it has the most attractive catchment area of all the London airports, with the possible exception of Heathrow. The Oxford-Cambridge ARC is of particular note, with it being home to businesses to whom international connectivity is important. An expansion of London Luton Airport will in turn drive growth in high-value sectors in the ARC			
NC.2.83	DHL is disappointed to see the expansion project fail to provide for any dedicated cargo growth at LTN. Given our experience over the past two years we disagree with the assumption in the Draft Need Case that significant growth in the dedicated cargo market is not anticipated. Globally, DHL Express saw volume growth of 10% in 2021 for our Time Definite International (TDI) product. In Europe, shipments per day grew by 12.4%. Furthermore, data from IATA shows demand for global air freight increased by 6.9% in 2021 compared with 2019, and 18.7% compared with 2020. Looking ahead, the Global PMI index sits	1	<p>The importance of cargo and growth is noted but growth at the airport needs to be balanced with environmental concerns, particularly regarding the operation of freighter aircraft at night.</p> <p>Having regard to the important role played by such deliveries, a limited number of freighter movements each year by these operators is included within the aircraft movement forecasts, but on the assumption that the number of such movements reverts to historic levels. In addition, when longer haul services are established at the airport, it is envisaged that these will also carry some freight in the belly holds of passenger aircraft.</p>	No

Ref	Comment	No PILs	Response	Change
	above 50 indicating demand is expected to remain stable in the coming months.			
NC.2.84	The Draft Need Case makes a number of references to the Government's Global Britain agenda as part of the Build Back Better Covid-19 recovery strategy. Facilitating trade, investment and tourism are set out as the three economic imperatives for expansion, particularly given the geographic location to the Oxford-Cambridge Arc. As an organisation which specialises in facilitating time-definite trade, critical to the life sciences industry, DHL believes it is a missed opportunity to exclude dedicated cargo growth in the expansion plan.	1		No
NC.2.85	DHL believes the economic benefit of the expansion project could be enhanced with the inclusion of dedicated cargo growth, specifically express freight. Analysis by York Aviation demonstrates the value of exports flown at night is 2.5 times higher than air freight flown during the day. The analysis found night flying in the UK contributed £16.5 billion in GVA and supported 213,200 jobs in 2019. Cargo operations, which are dominated by express freight during the	1		No

Ref	Comment	No PILs	Response	Change
	night, account for 50% of the economic contribution and 47% of the employment.			
NC.2.86	To support global trade, night flying for the express industry is an operational necessity rather than a preference. Flying overnight allows maximum productivity for our customers, enabling pick up close to the end of a working day and delivery at the start of the next working day. For example, we can collect goods at 17:30 in Hong Kong and achieve guaranteed next day delivery before 09:00 to London. The same process occurs in reverse for outbound shipments.	1		No
NC.2.87	We would encourage Luton Rising to re-consider the cargo stand provision to ensure there is appropriate and sufficient parking stands available to support cargo operations modernise and grow going forward. Driving international trade and reaching net zero are key pillars of this Government's strategy. We believe the expansion project should reflect both of these priorities for both dedicated cargo and commercial operations.	1		No
Employment and training				
NC.2.88	Suggestion that increased employment could be realised without expanding the airport.	1	The Proposed Development's demand forecasts are based on those used by the Department for Transport nationally. The extent to which there is uncertainty is	No

Ref	Comment	No PILs	Response	Change
			reflected in the range of forecasts presented in the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent. Growth at the airport delivers jobs and economic benefits to Luton through its operations. The improved connectivity provided by the airport as it grows, also makes Luton a more attractive location for investment and other businesses, which in turn helps the economy to diversify.	
NC.2.89	Suggestion that the employment and training opportunities on offer at the airport should be sufficiently advertised/promoted. Respondents suggest holding events in schools and colleges, letterbox leaflets, advertising in the local job centre, jobs hub, online, on social media and in the local press, emailing out job alerts, and that opportunities are published in a variety of languages.	2	There is already significant collaborative activity between the Applicant, the airport operator and LBC, in advertising opportunities at the airport. This includes the advertisement of all posts through the LBC and airport operator's jobs websites, in addition to the Applicant's weekly social media posts on selected vacancies, in order to provide a steady stream of local awareness. The ETS [TR020001/APP/7.05] , submitted with the application for development consent, seeks to build on this existing platform.	No
NC.2.90	General opposition to, and distrust of, the aviation sector, for example respondents are concerned that the sector will not provide reliable employment and the aviation industry has been overly subsidised by governments.	2	Concern noted. Government continues to support growth in the aviation sector because of its role in supporting the economy.	No
NC.2.91	Suggestion that the Applicant should focus on creating jobs and developing skills in the	4	The Applicant agrees with the sentiment of these comments and is in the early stages of planning to	No

Ref	Comment	No PILs	Response	Change
	green sector. Respondents suggest that the local economy could be strengthened and diversified by maximising employment opportunities in renewable energy sources.		address these matters outside of the Proposed Development which this application for development consent concerns. The ETS [TR020001/APP/7.05] , submitted as part of this application for development consent, has been developed to ensure that local residents can take advantage of the additional jobs created from the Proposed Development.	
NC.2.92	Concern that ways of maximising employment benefits, other than expanding the airport, have not been recognised.	1	Please refer to the response to Ref NC.2.45.	No
NC.2.93	Suggestion that certain employment practices should be implemented by the airport. Respondents suggest that 'parking on driveway' and 'rent a room' schemes should be supported.	1	Please refer to the response to Refs NC.1.62 and NC.1.63. With regards to employment practices and access to the airport for employment generally, the ETS provides avenues for the airport operator and airport employers to work with partners to address transport barriers. The ETS aims for improved accessibility, with a focus on sustainable and active travel, in coordination with the commitments and goals embedded in the Transport Assessment [TR020001/APP/7.02] and Framework Travel Plan [TR020001/APP/7.13] , both submitted as part of the application for development consent.	No
NC.2.94	Suggestion that the Applicant should engage with local educational institutions to support	4	Please refer to the response to Ref. NC.2.50. With regards to the development of industry relevant skills in the area, the ETS [TR020001/APP/7.05]	No

Ref	Comment	No PILs	Response	Change
	<p>the career development of industry-relevant skills in the area.</p>		<p>proposes introducing a new Local Economic Development Working Group with a focus on sharing skills and employment strategy information between the airport and local stakeholders for planning and coordination during both construction and operation.</p> <p>During operations, the airport operator, alongside the Applicant, will seek to build on existing, proven activities to develop a jobs and skills engagement programme. This will include activities to help residents of the ETS Study Area into work at the airport and connect them with training providers who can give them the skills they need.</p> <p>The airport operator and the Applicant would continue to deliver the existing “Get into Airports” scheme which currently provides placements in collaboration with the Princes Trust. This programme would create opportunities to provide workplace experience, alongside the opportunity to gain qualifications within the aviation industry for individuals who are currently unemployed or face barriers to employment.</p> <p>These activities would be complemented by the Jobs and Training Fairs, which would provide multiple opportunities throughout the year to bring together employers at the airport with local education, training and employment support organisations to promote opportunities for work at the airport.</p>	

Ref	Comment	No PILs	Response	Change
NC.2.95	Suggestion that the employment opportunities arising from the growth plans should prioritise the local community.	9	Please refer to the response to Ref NC.1.63.	No
NC.2.96	Concern that the forecast employment and economic growth will not be realised as the aviation industry is increasingly transitioning to automation, with reduction in jobs available.	1	Future productivity improvements in the aviation industry have been taken into account in the employment forecasts which are presented in the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent.	No
NC.2.97	Concern that the economic benefits promoted are futile as there is a low unemployment rate in the local area, respondents believe that there are a sufficient number of jobs at present and there is a lack of demand for more vacancies.	2	<p>Although it is true that many areas surrounding the airport have low unemployment, the population in this area is expected to grow by 5% between 2019 and 2040, with the highest growth rates in Bedford and Central Bedfordshire (+12%). New employment opportunities will be needed to avoid rising unemployment.</p> <p>In addition to this growth, automation will lead to many jobs becoming obsolete, potentially leading to a rise in unemployment. The Proposed Development would provide well paid jobs to address these eventualities.</p> <p>Although unemployment for the whole study area is below average, there are many pockets of deprivation, in which unemployment is a problem. The ETS [TR020001/APP/7.05] proposes targeting these areas, ensuring residents are made aware of new jobs and are provided with the training needed to acquire them.</p> <p>Tied to these pockets of deprivation, Luton has been identified as a priority area for levelling up. As such</p>	No

Ref	Comment	No PILs	Response	Change
			there is an identified need to grow the number of local jobs, not least because there is substantial out-commuting for work from Luton and there would be benefits in creating more local jobs for residents.	
NC.2.98	Suggest that the Applicant provide and/or support apprenticeships and work placements to develop industry-relevant skills in the area and recruit potential employees.	4	Please refer to the response to Ref NC.1.65.	No
NC.2.99	Suggestion that the Applicant should focus on creating jobs and developing skills in the green sector. Respondents suggest that the local economy could be strengthened and diversified by maximising employment opportunities arising from the climate crisis to; develop green technology and renewable energy sources, protect and improve the natural environment, improve the sustainability of existing buildings in the town, and expand the sustainable transport network.	2	Please refer to the response to Ref NC.2.48.	No
NC.2.100	Suggestions to further augment the benefits outlined, and ensure deliverability. The criticality of people engagement is well laid-out within the documents. To achieve this, LLAOL suggests a single Employment and Skills Forum initially, which simplifies this	1	The Luton Airport Employment and Skills Programme is intended to coordinate and ensure the various elements of the ETS are delivered. Further to this, a flexible approach to the structure outlined should be taken by the Applicant and airport operator, with groups merged or separated if this is identified as a preferred way	No

Ref	Comment	No PILs	Response	Change
	aspect of the proposal, whilst allowing intersectionality of achievements, concerns, or challenges to be thoroughly shared and explored. This single forum would hold the mandate and thought leadership for all suggested representative groups in the first instance and would build and develop over time and as demand for each becomes clearer. This will ensure that appropriate focus and resource is provisioned for in real time and targeted for best effect including the establishment of additional forums should they be required.		forward. At this stage, it is important to articulate the functions and actions early and commit to an initial structure which supports these functions and can evolve over time, particularly post submission.	
NC.2.101	More information is required on the location, scope (layout, size, scale) and ongoing operation of the described training facility, in order for LLAOL to fully support the development of this important service.	1	Please refer to the response to Ref NC.1.63	No
NC.2.102	LLAOL seeks support from the Applicant to clarify and agree the costs and responsibilities of the proposals, should it be the case that some of these are expected to reside with LLAOL	1	Consultation with LLAOL on a range of matters, including any proposals relevant to the ETS have continued since the 2022 statutory consultation and will continue.	No
NC.2.103	[Comments or suggestions for how the proposal might maximise employment, skills, community and social benefits and training opportunities to help benefit neighbouring	1	Please refer to the response to Ref NC.1.79. The governance of the ETS will ensure that there is sufficient and significant engagement with employers at the	No

Ref	Comment	No PILs	Response	Change
	communities.] Stronger cooperation and collaboration with airlines. Continued dialogue in order to ensure the growth remains sustainable, and supports the local community. Wizz Air intends to continue to promote the airport our network and the job opportunities on both our website and external channels.		airport, including airlines, to align the offer to employers' and employees' needs alike.	

Table A3.3: Regard had to statutory consultation responses on Need Case, Economics and Employment – Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
General				
NC.3.1	Concern that the need case for expansion is incompatible with the Government's levelling up agenda. Some respondents considered that other areas of the country, including the North, deserve more focus from levelling up than areas in the South-East. Others did not consider areas in the Oxford-Cambridge Arc to be in need of levelling up, or thought the need case was overly reliant on this to justify expansion.	29	Please refer to the response to Ref NC.1.10.	No
NC.3.2	Respondents suggest that there needs to be a cessation or reduction in air travel to reduce environmental harm and achieve international climate change targets. Flights should be disincentivised through increased tax and/or constrained supply, cheap short-haul flights should cease or be reduced, and the airport should be reduced, not expanded.	393	Please refer to the response to Ref NC.2.9. It is for Government to determine whether it wishes to tax the aviation sector further, however the assumptions used in the demand forecasts mirror those used by Government in its analysis underpinning the Jet Zero Strategy. This policy makes clear that continued growth in aviation is supported because of the economic benefits it delivers.	No
NC.3.3	Concern that the general impacts of the Proposed Development will outweigh the forecasted economic benefits. Respondents are concerned that the perceived local economic	156	Please refer to the response to Ref NC.2.3.	No

Ref	Comment	No. CC	Response	Change
	benefits are being prioritised above wider negative impacts, including environmental impacts.			
NC.3.4	Concern that the scale of the Proposed Development is too high and that there would be too many flights. Respondents are concerned that an increase in the number of flights will exacerbate existing negative impacts.	140		No
NC.3.5	Concern that the scale of the Proposed Development is too large. Some respondents recognise the need for growth but consider the scale of growth, both in terms of the proposed building work and the number of passengers, to be disproportionate to the need.	102	Please refer to the response to Ref NC.2.5.	No
NC.3.6	Suggest the airport becomes more attractive to new airlines, including long haul carriers, to increase competition, create better value flights for customers and bring in more revenue.	6	The Proposed Development, particularly Terminal 2, is aimed at making the airport more attractive to long haul airlines. Improved facilities generally will make the airport more competitive.	No
NC.3.7	Suggest the Applicant continue to fund charities and local groups to support people in the local area.	7	Please refer to the response to Ref NC.2.7.	No
NC.3.8	Suggestion that a phased approach to growth, with a long-term outlook, should occur, especially considering the likely advances in technology.	3	The Proposed Development is to be delivered incrementally. This would allow the delivery of new capacity to meet demand, based on the business case at the time. This is reflected in the demand	No

Ref	Comment	No. CC	Response	Change
	Respondents also recognise that the timescales of such phasing may change.		forecasts, which have taken different rates of growth into account. A range of unconstrained demand forecasts have been adopted for assessment, taking into account the potential for different growth case scenarios. Forecasts are presented in the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent.	
NC.3.9	Support the Proposed Development because it will help alleviate capacity pressures at other airports around London and beyond.	5	Noted.	No
NC.3.10	Support the Proposed Development adding extra capacity without an extra runway.	1	Noted.	No
NC.3.11	Concern that flying from Luton will become more expensive. Respondents are concerned that airlines may include Sustainable Aviation Fuel (SAF) consumption cost premiums within ticket costs, cheap flights will not be allowed to continue in light of net-zero commitments, and that the Proposed Development may result in higher costs for travellers.	5	The demand forecasts have taken into account the potential for increased air travel costs, such as increased fuel prices and/or costs on carbon. A range of unconstrained demand forecasts have been adopted for assessment, taking into account the potential for cost increases in a Slower Growth case scenario. Forecasts are presented in the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent.	No
NC.3.12	Suggestion that growth at the airport should be limited/contained, especially to reduce the negative environmental impacts that expansion would bring. Respondents recognise that air	22	Concern noted. The Applicant considers that future growth can be managed within acceptable environmental limits and controlled through the GCG approach,	No

Ref	Comment	No. CC	Response	Change
	travel is unlikely to cease, but suggest placing a cap on Air Traffic Movements, waiting for Project Curium to be completed, not allowing flights to return to pre-pandemic levels and/or reducing the current number of flights.		information on which can be found in the GCG Explanatory Note [TR020001/APP/7.07] .	
NC.3.13	Suggestion that the Applicant improve the air travel service on offer at the airport by introducing new destinations and long-haul flights. Respondents suggest introducing flights to non-European destinations (especially to South Asian and Middle Eastern countries) and offering more flight times. Some respondents suggest that the airport should only offer flights to destinations where it would not be possible to travel there by rail in a day.	39	Once Terminal 2 is operational, it expected that the airport will be able to attract some longer haul flights to the eastern part of America and/or the Middle East. The runway is not long enough for direct flights to South Asia, but these destinations could be served through Middle East hubs.	No
NC.3.14	Support towards the Proposed Development in general. Respondents consider the proposals to be appropriate, that there is a justified need case.	91	Noted.	No
NC.3.15	Suggest that there should be a ban on night flights. Some respondents considered that this would bring the airport in line with other London airports such as Heathrow.	63	Please refer to response to Ref NC.2.13.	No
NC.3.16	Concern about the impact of a 70 per cent increase in flights at night (between 11pm and 7am) and a 50 per cent increase in flights during the day.	124		No

Ref	Comment	No. CC	Response	Change
Forecasts				
NC.3.17	Concern that the demand forecasts do not take Brexit into account, or that Brexit creates uncertainty for the forecasts.	181	Please refer to the response to Refs NC.1.39, NC.2.19 and NC.2.22.	No
NC.3.18	Concern that there won't be a sufficient amount of airline customers, through new or existing airlines, to justify the demand forecasts for expansion.	6	The demand forecasts for the airport are in line with the Government's overall projections for the growth in air passenger demand over the period to 2040 and beyond. Where there is demand, it is expected that existing or new airlines will seek to meet that demand.	No
NC.3.19	Concern that the demand forecasts are inaccurate or uncertain. Respondents are concerned that long term demand cannot be reliably predicted, the Government aviation strategy is out-of-date, and future reductions in demand have not been taken account of.	228	Please refer to the response to Ref NC.2.20.	No
NC.3.20	Concern that climate change awareness will remove or reduce the demand for air travel. Respondents believe that that more people will choose to fly less for environmental reasons, aviation will need to be restricted in the future as climate change worsens, and that Government climate change policy may impact demand in the future.	326	Please refer to the response to Ref NC.2.22.	No

Ref	Comment	No. CC	Response	Change
NC.3.21	Concern that the increased cost of living will remove or reduce the demand for air travel. Respondents are concerned that increased costs in household bills, taxes, food and fuel, amongst others, will result in there being less disposable income for people to spend on air travel.	192		No
NC.3.22	Concern that the increased use of digital technology and video-conferencing will reduce the demand for air travel.	194		No
NC.3.23	Concern that the Proposed Development is unnecessary. Respondents are concerned that the Proposed Development is a want rather than a need, the airport and number of passengers is big enough at present, the negative impacts of the Proposed Development will outweigh the benefits and that there is no sufficient argument in favour of the proposals.	611	Please refer to the response to Ref NC.2.1.	No
NC.3.24	Concern that global conflict will reduce the demand for air travel. Respondents are concerned about the weaponisation of fossil fuels, the impact of the war in Ukraine, supporting an industry associated with exporting military equipment and general political uncertainty.	95	Please refer to the response to Refs NC.2.20 and NC.2.22.	No
NC.3.25	Concern that the rising costs of running the airport and the airline will remove or reduce the demand for air travel. Respondents are	90		No

Ref	Comment	No. CC	Response	Change
	concerned that the rise in oil prices, inflation and taxes, for airports and airlines, will lead to increased flight costs for passengers, leading to reduced demand.			
NC.3.26	Concern that the forecasted demand is based on a lack of evidence, which does not justify the Proposed Development going ahead. Respondents are concerned that the data used to back up the forecasted demand is out of date or speculative, and the need case has not been adequately demonstrated, or is one sided.	119		No
NC.3.27	Concern that the demand forecast is based on out-of-date information, which does not justify the Proposed Development going ahead. Respondents are concerned that the demand forecast is not representative of the real current and/or future demand for flights from the airport and does not take account of recent events and changes which have impacted the aviation industry.	151		No
NC.3.28	Concern that the demand forecast has been overestimated or manufactured by the Applicant. Respondents are concerned that the demand forecast is unrealistic and does not take account of factors which will reduce the demand for air travel.	126		No

Ref	Comment	No. CC	Response	Change
NC.3.29	Suggestion that the need case figures and models should be updated to reflect the latest factors impacting demand for air travel, including government net-zero commitments, post-pandemic recovery, international conflict, Brexit, the completion of previous growth plans, Local Plan provisions, and the cost of carbon. Respondents suggest delaying the Proposed Development until a better understanding of future demand and potential economic benefits can be gained.	63		No
NC.3.30	Support towards the demand forecasting, which respondents believed to be well justified and to reflect the likely return and increase in demand for air travel.	25	Noted.	No
NC.3.31	Support towards the demand forecasts, which respondents believe demonstrate that the benefits of the Proposed Development outweigh the negative impacts. Some respondents have reservations about the potential environmental impacts but consider the economic benefits to take precedence over these concerns.	17	Noted.	No
NC.3.32	Concern that general work and leisure pattern changes have reduced or removed the demand for air travel. Respondents are concerned that people are flying less due to the increase in UK 'staycations', the reduction of migrant workers,	78	Please refer to the response to Refs NC.2.22 and NC.2.35.	No

Ref	Comment	No. CC	Response	Change
	flexible working practices, 'flight shame' and businesses wanting to save time spent traveling.			
NC.3.33	Concern that the Applicant has not considered expansion occurring, or planned, at other airports, which negates the forecasted demand for the Proposed Development. Respondents are concerned that the impact of growth in UK aviation is not being considered as a whole but on an individual airport basis.	46	Please refer to the response to Ref NC.2.36.	No
NC.3.34	Suggestion that the airport is expanded incrementally to reflect the inherently difficult nature of forecasting passenger demand, rather than spending vast amounts of revenue on a 'leap and hope' approach.	1	Please refer to the response to Ref NC.3.8.	No
NC.3.35	Suggestion that the need case for the Proposed Development is not solely based on traffic modelling, but considers other global factors as well.	1	Global factors are taken into account in the demand forecasts which are set out in the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent.	No
NC.3.36	Suggestion that the following should be considered in relation to the need case figures and models; <ul style="list-style-type: none"> A sensitivity test is required to test the implications if long-haul business does not develop at Luton. 	1	Sensitivity testing of demand forecasts, which have taken into account different rates of growth, has been undertaken and is discussed in further detail in the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent. A range of unconstrained demand forecasts have been adopted for assessment, taking into account the potential for different growth case scenarios,	No

Ref	Comment	No. CC	Response	Change
	<ul style="list-style-type: none"> • A sensitivity test is required should the high load factors not be sustained. • Luton Rising should clarify the level, passenger type, and locations of any air traffic and air passenger displacement which takes place as a result of the proposed expansion. Luton Rising should then apply this level of displacement consistently throughout the application, including in non-economic topic areas where relevant • A quantitative assessment of the net GDP and jobs impact of the scheme on flows of outbound and inbound tourism spending in the UK should be provided by Luton Rising, and the implications discussed. • Luton Rising should present their chosen inputs for their inbound tourism calculation, including assumed spend and displacement. • Luton Rising should disaggregate the sources of their journey time benefits. • Luton Rising should assess and publish the monetary cost of the greenhouse gas emissions associated with their proposed expansion. • Luton Rising should quantify the value of non-CO2 climate impacts resulting from 		<p>this includes whether high load factors may not be achieved.</p> <p>Tourism, and the effect of outbound travel on the UK economy is highly complex and it is not as straight forward as simply estimating expenditure overseas by UK travellers. This is discussed further in the Need Case [TR020001/APP/7.04]. Factors that need to be taken into account include, but are not limited to:</p> <ul style="list-style-type: none"> • the extent of substitutability of UK airports, from the perspective of outbound leisure passengers is high. This suggests that many outbound travellers will still travel if they cannot use the airport, if sufficient capacity is not provided; • outbound travel from the UK supports significant Gross Value Added (GVA) and employment in the domestic economy (outside of that supported through the operation of the airport) because travellers buy goods and services before they leave the UK; • it is not clear whether the expenditure lost via people travelling overseas would actually be injected into the UK economy if they were not able to travel overseas; • travellers may take longer holidays – if potential passengers cannot travel as 	

Ref	Comment	No. CC	Response	Change
	the proposed expansion and present these in their economic analysis. Luton Rising should quantify and value the emissions resulting from inbound air traffic movements and should present these in their economic analysis.		<p>frequently from the airport because of future constraints on its capacity, they may simply choose to take longer holidays, thereby increasing the overseas expenditure associated with any individual trip; and</p> <ul style="list-style-type: none"> outbound travel has positive economic benefits – the potential positive impacts of outbound travel on GVA would need to be considered. <p>Regarding the monetary cost associated with emissions, The demand forecasts have been updated to take into account the latest Government figures on the cost of carbon, with this having no impact on the need case forecasts.</p>	
NC.3.37	Concern that the Covid-19 pandemic has removed or reduced the forecasted passenger demand, or that the full impact of the pandemic on demand is not yet known. Respondents are concerned that it is an inappropriate time to invest in aviation, the potential impact of future pandemics is not known, and that demand forecasts are based on pre-pandemic data.	356	Please refer to the response to Ref NC.2.22.	No
Why Luton?				
NC.3.38	Consider London Luton Airport suitable for growth, which will maintain the area as an	2	Noted.	No

Ref	Comment	No. CC	Response	Change
	important transport hub and make the airport more accessible.			
NC.3.39	Concern that other airports are better placed to accommodate growth, negating the forecasted demand for the Proposed Development. Respondents consider other airports to be better located or have more appropriate existing infrastructure to accommodate increased flights.	1	Please refer to the response to Ref. NC.2.36 The demand forecasts already take into account growth at other airports. In any event, the demand the Proposed Development is intended to meet is largely local to Luton and surrounding areas. The suggestion of encouraging passengers to use alternative airports, particularly those in the north (if any such capacity exists), would lead to passengers having to make much longer surface access journeys leading to additional congestion and pollution.	No
NC.3.40	Concern that other airports are better placed to accommodate growth. Respondents consider other airports to be better located or have more appropriate existing infrastructure to accommodate increased flights. Some believe that airport growth should be directed towards the north of the country, rather than focusing on London.	91	The demand forecasts already take into account the expansion plans of other airports, including the provision of an additional runway at Heathrow or the permanent use of the north runway at Gatwick.	No
NC.3.41	Concern that capacity for growth is already covered by expansion at other airports in the south of England and beyond.	86		No
NC.3.42	Concern that Luton is an unsuitable location for an airport in principle, let alone for expansion. Respondents are concerned that the application site is too close to residential areas, has unsuitable topography, lacks sufficient supporting transport infrastructure and is too small to accommodate further growth.	204	The environmental assessment process takes into account the location of the airport and the impacts on the communities around it. The design development of the Proposed Development has fully taken into account any constraints of the site. The benefits and negative impacts of the Proposed Development will be fully considered by the ExA.	No

Ref	Comment	No. CC	Response	Change
NC.3.43	Support towards the convenience that the Proposed Development would continue to provide for local residents to enable easy access to air travel, as well as increasing the choice of flights and destinations available. Some respondents consider Luton to be more appropriate for growth than other airports.	101	Noted.	No
NC.3.44	Suggest that the funds for the Proposed Development could be better spent or invested elsewhere. Respondents have suggested that the funding for the proposals could be directly invested into the local community's services, charities, businesses, infrastructure (including rail), green industries, public transport and town centre, as an alternative way of realising the proposed economic benefits.	365	<p>The Applicant has a long and successful track record of investing in the community and is committed to continuing this programme with or without the Proposed Development. Growth of the airport would allow that community funding programme to be further extended.</p> <p>In addition to the benefits associated with the Proposed Development, the Applicant is currently bringing forward (or has plans in place to bring forward), other development programmes separate to those included in the application for development consent, which would help address matters such as social justice and the green sector and other projects which directly benefit local people.</p>	No
NC.3.45	Suggest Terminal 1 and the airport's existing facilities should be improved before, or done instead of, expanding the airport.	80	Please refer to the response to Ref. NC.2.50 and NC.3.71.	No

Ref	Comment	No. CC	Response	Change
NC.3.46	Suggest alternative modes of transport should be encouraged rather than meeting the demand for air travel. Respondents suggest that more sustainable and/or safer public transport modes should be invested in, especially rail, however some respondents suggest investing in the road network. Some respondents suggest that the UK should follow the example of other countries by banning flights where there is an alternative route by rail, or introduce a frequent flyer charge which could fund alternative transport modes.	46	Please refer to the response to Ref. NC.2.51.	No
NC.3.47	Suggestion that as an alternative to the Proposed Development, a new airport should be built elsewhere. Respondents suggest building an airport away from populous areas, in another county, offshore, on the coast, or further down the River Thames.	5	The purpose of the Proposed Development is to enable the growth of demand for air travel to be met, in line with Government policy. Alternative locations for airports to serve London were considered by the Airports Commission, which reported in 2015, and ruled out options such as the Thames Estuary. Instead, the Government decided to support a new runway at Heathrow and all other airports, including London Luton Airport, making best use of their existing runways.	No
NC.3.48	Suggestion that as an alternative to the Proposed Development, the airport site should host an alternative use. Respondents suggested using the site as a park, a native forest, an industrial/technological employment site, a training centre, a business park, an air cargo hub, a green energy production hub, a school or college, a hospital, housing, town centre functions, or temporary car parking.	25		No

Ref	Comment	No. CC	Response	Change
NC.3.49	Suggestion that growth proposals should be put on hold until all modes of transport are carbon-neutral, fossil-fuel free and truly sustainable. Some respondents suggest implementing a 'no-fly decade' to prevent further harm whilst improved technology is developed.	2	Please refer to the response to Ref NC.1.10.	No
Cost				
NC.3.50	Suggestion that funding for the Proposed Development should come from private investment, rather than from LBC.	2	Please refer to the response to Ref NC.2.54.	No
NC.3.51	Suggestion that payments/debts to LBC should be paid back.	1	All loans made by LBC will be paid back in full by the Applicant.	No
NC.3.52	Concern that the cost of expansion in general is too high. Respondents are concerned that: costs will increase, the airport is already in debt, it is a waste of money, there are associated risks with the cost, the source of funding is uncertain, the current economic climate does not justify the costs, and that the money could be put to better use.	209	<p>The Funding Statement [TR020001/APP/3.03], which is submitted as part of this application for development consent, sets out how the Proposed Development is fundable.</p> <p>The source of finance that will ultimately be used to support the construction cost will be determined based on prevailing market conditions and available options at the appropriate time and will depend upon a range of economic variables.</p> <p>The Proposed Development will proceed as demand grows, and growth will be based on the business case at the time.</p>	No
NC.3.53	Concern that the cost of the Proposed Development for the taxpayer is too high. Respondents are concerned that taxation will increase, public money is being put at risk or wasted, the source of funding is unclear and that	112		No

Ref	Comment	No. CC	Response	Change
	there is a lack of transparency about how public money has been, and will be, spent.			
NC.3.54	Concern regarding the poor financial track record of LBC, which respondents believe should result in the Proposed Development not going ahead. Respondents are concerned that too much money has been borrowed or wasted on the airport already, LBC are already in high levels of debt, the proposals will put LBC at financial risk, dividends from the airport will not be paid to LBC, and that the Applicant cannot afford the proposed scheme.	104		No
Economic case/job creation				
NC.3.55	Concern that the Proposed Development is profit driven. Respondents are concerned that the primary motivation behind the proposals is to increase revenue for the Applicant, as well as serving the short term interests of construction companies. Profits are believed to be prioritised above the potential environmental and social harm resulting from the Proposed Development.	328	Please refer to the response to Ref NC.2.2.	No
NC.3.56	Concern that there is no need case for increasing cargo/freight flights, that alternative modes of travel should be used to transport such goods, or that increased freight flights do not make the airport more competitive.	4	There is currently no proposal to increase the number of cargo flights above those that have historically used at the airport.	No

Ref	Comment	No. CC	Response	Change
NC.3.57	Conditional support towards the Proposed Development. Respondents recognise the benefits that growth could bring but believe that it should be dependent on: the negative impacts being mitigated against, the continuation of a recognised demand for air travel, an assumption that future technology improvements will decarbonise aviation, or that the economic benefits will be prioritised.	34	Support noted. The Proposed Development will be in accordance with the Government's Jet Zero Strategy, which will set out the steps that are required to decarbonise aviation. The ETS [TR020001/APP/7.05] , has been developed to ensure that local residents can take advantage of the additional jobs created from the Proposed Development.	No
NC.3.58	Suggest that the Applicant should focus on creating jobs and developing skills outside of the aviation sector. Respondents suggest that the local economy could be strengthened, diversified and made more resilient by investing in other sectors including trade, education, manufacturing, automotives, engineering, environmental protection, life sciences, logistics, leisure, social care, agriculture, waste management, academic research and healthcare.	141	Please refer to the response to Ref NC.2.45 and NC.2.48.	No
NC.3.59	Concern that there are no economic benefits from the Proposed Development with regards to jobs and/or the economy, or that any benefits are limited or overstated. Respondents are concerned that there will be limited local economic benefits, predicted benefits from previous expansions have not been proved, job	373	Please refer to the response to Refs NC.1.63 and NC.2.68. In terms of the wider benefits, the Oxford-Cambridge-London triangle is home to many international businesses and important clusters of innovative and high-tech businesses. These businesses rely on international connectivity to	No

Ref	Comment	No. CC	Response	Change
	opportunities will be created through taking the market share from other airports, the quantity and quality of jobs proposed is low, economic benefits lack longevity and that the Oxford Cambridge Arc is a redundant argument for the Proposed Development.		remain competitive, and growth of the airport is an essential part of maintaining that connectivity.	
NC.3.60	Support towards the benefits that the Proposed Development will bring to the local community. Respondents support the continuation and increase of investment into frontline services and local charities, as well as tackling poverty in the area.	199	Noted.	No
NC.3.61	Concern that Luton has an over-reliance on the airport to provide jobs and support the town's economy. Respondents are concerned that demand for air travel is uncertain and may not sustain long term economic growth/jobs, that Luton requires a diverse economy, it is too risky to rely on one sector to sustain the local economy, and that growth goes against Government advice to LBC to reduce financial dependence on the airport.	255	Please refer to the response to Ref NC.2.45.	No
NC.3.62	Concern that the Proposed Development will not bring economic benefits and jobs to impacted communities outside of Luton. Respondents are concerned that settlements outside of Luton would suffer the same, or worse, levels of	180	Please refer to the response to Ref NC.1.66 and NC.1.72.	No

Ref	Comment	No. CC	Response	Change
	negative impacts as Luton, without experiencing the same level of benefits.			
NC.3.63	Concern that there is not a sufficient number of workers, or appropriately skilled workers, available to sustain the growth proposals. Some respondents are concerned that the Proposed Development will draw workers away from other local vacancies that need filling.	20	Please refer to the response to Refs NC.2.54 and NC.3.78.	No
NC.3.64	Concern that the Proposed Development will primarily provide low-skilled and low-paid jobs. Respondents are concerned about the airport's appeal to potential employees outside the local area, the seasonality and working hours of some jobs, job security, zero-hour contracts and the short-term nature of construction jobs.	59	Please refer to the response to Refs NC.2.64. Please refer to the response to Ref NC.1.62 for details on continuous employee development.	No
NC.3.65	Concern that new jobs arising from the Proposed Development will not go to local people. Respondents are concerned that the airport will rely on a foreign or non-local workforce, some jobs will be replaced by automated technology, and that higher-skilled jobs are unlikely to be performed by local people.	40	Please refer to the response to Refs NC.1.63 and NC.3.78.	No
NC.3.66	Concern that the Proposed Development has been demanded by the airlines. Respondents are concerned that the airport has released too many slots before quieter aircraft have been	4	This comment relates to current operations and the application for consent to increase to 19 mppa. The 19 mppa application is being progressed by LLAOL	No

Ref	Comment	No. CC	Response	Change
	introduced, leading to airlines holding the airport to ransom by threatening to operate from other airports if additional growth is not offered. Respondents believe that the airport only being able to access additional funding from Aena based on increased passenger numbers is not appropriate justification for growth.		and is separate to this application for development consent.	
NC.3.67	Concern that the airport itself, along with other parts of the travel industry, have generated demand for air travel and freight themselves, rather than purely responding to it.	1	Concern noted. The Applicant does not believe this to be the case. Government policy supports airport expansion to meet demonstrable demand.	No
NC.3.68	Suggest Luton should diversify its economy by attracting other businesses to the area, to provide more jobs, and raise the level and range of skills for local people. Respondents suggest investing in the following industries; leisure, entertainment, hospitality, manufacturing, commercial, technical, financial, biotechnology, defence, and ICT, as well as supporting start-up businesses. Many respondents also emphasised the importance of investing in the green sector.	127	Please refer to the response to Ref. NC.2.45.	No
NC.3.69	Suggestion that the Applicant should support the local economy by supporting small and local businesses. Respondents suggest that; appropriate and affordable facilities for local private enterprise should be provided at the airport, business rates should be cut, local	31	Please refer to the response to Ref. NC.2.79.	No

Ref	Comment	No. CC	Response	Change
	businesses should be employed to perform public works, public transport companies should be locally based, local businesses should be invested in, provide or subsidise small industrial units, the airport should host local business networking events, the wider supply chain should be kept local, the Preston Model should be adopted for the local economy, and that the local green sector should be supported.			
NC.3.70	Suggest income derived from airport ownership should be invested in a local trust for the community, to ensure transparency, on the basis the proposed benefits are not realised.	1	Luton Rising has a long standing record of contributing back into the community it serves, made possible by the returns it receives from the airport. The Community First proposals build on that track record and seek to target two themes which are central to our philosophy of being a community airport here to serve and enhance life chances for those in the region.	No
NC.3.71	Suggestion that the use of the existing terminal should be maximised instead of implementing the Proposed Development. Respondents suggest that additional passenger demand could be catered for by using satellite boarding areas connected to the main terminal, whilst a single terminal processing area with centralised security should allow greater levels of synergies compared to two terminals being operated, as is the case at Stansted.	1	Please refer to the response to Ref. NC.2.41.	No

Ref	Comment	No. CC	Response	Change
Employment and training				
NC.3.72	Suggestion that the economic benefits of the Proposed Development could be realised without expanding the airport. Respondents suggest that jobs could be created in making the existing airport more environmentally sustainable, developing wildlife friendly landscaping, improving rail transit to the airport, renewable energy production, building community centres and developing industrial units. Some respondents suggested that local people could pay more taxes to support employment opportunities and training.	31	Government has identified a shortage of airport capacity, particularly in the South East of England, to meet demand and so supports airports making best use of their existing runways. The application for development consent responds to this policy.	No
NC.3.73	Suggestion that certain employment practices should be implemented by the airport. Respondents suggest that providing long term jobs should be a priority, staff should be in a trade union, flexi-time is available, wages should not be the statutory minimum, job opportunities should be gender equal, disabled employees should be supported, sufficient training should be provided, zero-hour contracts should not be allowed, part-time jobs should be limited, and that ex-offenders and those on benefits should be supported.	27	<p>The ETS [TR020001/APP/7.05], submitted as part of the application for development consent, provides a framework to connect the airport, airport employers, local education and training institutions and local communities. This will ensure local residents are aware of the new jobs created by the Proposed Development and have access to the training required to access them.</p> <p>During operation, in order to encourage and support good practice, the airport operator will set up the Airport Employers Community Forum (AECF) including human resources leaders from businesses across the airport, which will set the benchmark for good practice. The AECF will</p>	No

Ref	Comment	No. CC	Response	Change
			<p>provide a space to discuss any issues relating to accessibility, equality, diversity and inclusion, recruitment or procurement. It will provide a platform of members to share knowledge and best practice in order to create a high quality work environment. Members of the AECF will include the airport operator and is intended to include contractors and third party businesses, and the airport operator will chair this Forum.</p> <p>During operations, the airport operator would work with employers at the airport to support the Real Living Wage to be adopted or maintained across the airport and ensure high quality employment standards are promoted, including aiming to reduce zero hours contracts. The airport operator has already implemented the Real Living Wage and they will support and encourage other businesses across the airport to adopt it. Adoption of Real Living Wage will be discussed through the AECF.</p> <p>Please refer to the response to Ref NC.1.65 for details on the programme and employment and training targets.</p> <p>Please refer to the response to Ref NC.1.72 for details on upskilling for long-term unemployed people.</p>	
NC.3.74	Suggestion that the employment and training opportunities on offer at the airport should be	18	Please refer to the response to Ref NC.2.46.	No

Ref	Comment	No. CC	Response	Change
	sufficiently advertised/promoted. Respondents suggest holding events in schools and colleges, letterbox leaflets, advertising in the local job centre, jobs hub, online, on social media and in the local press, emailing out job alerts, and that opportunities are published in a variety of languages.			
NC.3.75	Suggest the employment and economic benefits of the Proposed Development should be shared throughout the wider area. Respondents suggest that; benefits should not be limited by socio-economic status, outlying villages should not be forgotten, benefits should be proportional to the negative impacts experienced, and that Luton should compete with London's employment offer.	15	The economic benefits of the Proposed Development have been quantified and evidence shows that past growth at the airport has supported increased employment. This has largely been taken up by residents across the three counties of Bedfordshire, Buckinghamshire and Hertfordshire, delivering local benefits through employment and the associated supply chain. Further information is included in Chapter 11 Economics and Employment of the ES [TR020001/APP/5.01] .	No
NC.3.76	General opposition to, and distrust of, the aviation sector, for example respondents are concerned that the sector will not provide reliable employment and the aviation industry has been overly subsidised by governments.	8	Please refer to the response to Ref NC.2.47.	No
NC.3.77	Concern that the economic benefits promoted are futile as there is a low unemployment rate in the local area, respondents believe that there are a	37	Please refer to the response to Ref NC.2.54.	No

Ref	Comment	No. CC	Response	Change
	sufficient number of jobs at present and there is a lack of demand for more vacancies.			
NC.3.78	Suggest that the employment opportunities arising from the growth plans should prioritise the local community and support the economy of Luton by reducing unemployment. Respondents suggest prioritising jobs for people in easy access of the airport, supporting local suppliers and services, initiating a local labour scheme, promoting skills development and apprenticeships (especially for young people), supporting people on benefits, offering free public transport to incentivise locals to work at the airport, and ensuring more highly skilled jobs also go to local people.	81	<p>Please refer to the response to Ref. NC.1.62, NC.1.63 and NC.3.73.</p> <p>With regards to employment and public transport, the ETS provides avenues for the airport operator and airport employers to work with partners to address transport barriers that many in the area face. The ETS aims for improved accessibility, with a focus on sustainable and active travel, in coordination with the commitments and goals embedded in the Transport Assessment [TR020001/APP/7.02] and Framework Travel Plan [TR020001/APP/7.13], submitted as part of the application for development consent.</p> <p>Regarding jobs and the local community, in seeking to ensure more highly skilled jobs go to local people, the ETS suggests taking the opportunities presented by the Proposed Development to embed a culture of continuous employee development, in which there are career prospects at all levels. A framework would be created in which lifelong learning and career progression is facilitated and the Applicant, employers and employees come together and prepare and implement a plan for training needs. The airport itself would become an aspirational place to work where employees are continuously</p>	No

Ref	Comment	No. CC	Response	Change
			developing new skills, enabling local people to secure higher skilled jobs and higher salaries over time.	
NC.3.79	Suggest the Applicant should engage with local educational institutions to support the development of industry-relevant skills in the area and recruit potential employees. Respondents suggest; setting up an educational facility at the airport, providing educational fees support and certification, investing in local educational institutions, holding design competitions, hosting open days on the site, and visiting schools, colleges and universities.	49	Please refer to the response to NC.1.62, NC.1.63 and NC.1.65.	No
NC.3.80	Suggest that the Applicant provide and/or support apprenticeships and work placements to develop industry-relevant skills in the area and recruit potential employees.	58	Please refer to the response to Ref NC.1.65.	No
NC.3.81	Suggestion that the Applicant should focus on creating jobs and developing skills in the green sector. Respondents suggest that the local economy could be strengthened and diversified by maximising employment opportunities arising from the climate crisis to; develop green technology and renewable energy sources, protect and improve the natural environment, improve the sustainability of existing buildings in	215	Please refer to the response to Ref NC.2.48.	No

Ref	Comment	No. CC	Response	Change
	the town, and expand the sustainable transport network.			

A4: GREEN CONTROLLED GROWTH

Table A4.1: Regard had to statutory consultation responses on GCG comments - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
General						
GCG.1.1	We very much welcome, in principle, the GCG Framework and consider this to be a significant step forward in reassuring the communities around the airport that LR and the airport operator will deliver on mitigation and that this can be adaptive to account for changes in external variables compared to what has been assumed through the environmental impact assessment work. It is noted that this is a draft document and that it will be developed further as progress is made towards the application being submitted and that it will be subject to subsequent engagement beyond this Statutory Consultation stage. We would very much welcome this further engagement to the		Host Authorities	4	The support for the Green Controlled Growth Framework [TR020001/APP/7.08] is noted and welcomed. Further engagement was undertaken with host authorities and other key stakeholders to support the GCG Framework through the POCG (Planning Officers Co-ordination Group) and topic-specific technical forums prior to the submission of the application for development consent.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	extent that a refined GCG will be prepared and submitted with a large measure of agreement between the HAs and LR without prejudice to the position each authority will take on the acceptability of the Proposed Development overall.					
GCG.1.2	NHC is strongly supportive of the principle of having a GCG framework.		North Hertfordshire District Council	1	Noted.	No
GCG.1.3	We welcome this new environmentally focused approach to managing growth that has been developed in response to the 2019 public consultation feedback.		Central Bedfordshire Council	1	Noted.	No
GCG.1.4	This is an important document that sets an ambitious agenda. It is well written and largely clear. It exhibits some detailed thinking on the environmental challenges faced by the airport expansion and demonstrates some robust thinking in the way some critical issues can be controlled.		Host Authorities	4	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
GCG.1.5	Buckinghamshire Council welcomes the proposals set out in the green controlled growth document and the commitment to maintain growth within strict environmental limits and be subject to independent scrutiny.		Buckinghamshire County Council	1	Noted.	No
GCG.1.6	In its current draft form it [GCG] is also a plan in which any outcome is possible, and is essentially a set of promises to get the planning over the line.	Slip End Parish Council		1	A fundamental principle of the GCG Framework is that it secures legally binding limits on the extent of impacts associated with the Proposed Development for the ongoing operations at the airport. This commitment means that any exceedance of the Limits will have significant implications for the airport, and ultimately, the additional growth at the airport authorised by the Proposed Development can only be delivered if environmental effects remain within the limits of the GCG Framework. Additional information can be found within the GCG Explanatory Note [TR020001/APP/7.07] and GCG Framework [TR020001/APP/7.08] .	

Ref	Comment	PC	LA	No PILs	Response	Change
GCG - Scope						
GCG.1.7	We have some concern that the approach to limiting GHG emissions allows (in respect of Scope 3 emissions, from surface transport for example) for the airport operator to adopt offsetting arrangements. Whilst accepting that changes in factors such as the take-up of electric vehicles more widely is outside of the control of the airport operator, there is much that the operator can do to encourage the reduction of Scope 3 emissions and to allow offsetting will not encourage such action. We would wish to explore this point further with LR as we consider that there remains a lack of commitment to addressing emissions from surface access and encouraging sustainable modes of access to the airport.		Host Authorities	4	<p>Greenhouse gas emissions (GHG) across the full range of airport activity is an issue that the Applicant takes seriously. The Surface Access Strategy [TR020001/APP/7.12] submitted as part of the application for development consent, sets out a range of measures to reduce surface access-related GHG emissions at the airport, either through encouraging modal shift to more sustainable modes of transport, or through encouraging the use of less polluting vehicles.</p> <p>However, as noted in your response, there are many factors that are outside the control of the airport operator, particularly in the context of passenger travel where issues such as wider Government policy are likely</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>to have a significantly greater influence on an individual's take-up of electric vehicles than any measures associated with infrequent airport trips.</p> <p>As such, it is appropriate for greenhouse gas limits set through the GCG strategy to be expressed as a 'net' limit, inclusive of carbon offsets (the cost of which will act as an incentive to drive reductions in GHG emissions at the airport).</p> <p>To demonstrate the Applicant's commitment to delivering reductions in surface access GHG emissions, it is proposed to align this limit with a commitment (through the Net Zero Strategy) to be carbon neutral for surface access by 2040.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
GCG.1.8	We welcome the inclusion of GHG emissions in the GCG concept, however, would question why emissions from flights appear to be excluded. It is considered that such emissions should be included in assessments for completeness.		Central Bedfordshire Council	1	<p>As the Applicant developed the GCG framework, it has carefully considered the inclusion of Scope 3 aviation emissions in the context of the UK Emissions Trading Scheme (UK ETS), introduced in January 2021. The UK ETS proposes a sector-wide 'cap and trade' approach to the management of GHG emissions. Aviation is incorporated within the UK ETS, and the Government has consulted on setting an appropriate trajectory for UK ETS that allows the UK to reach net zero by 2050.</p> <p>Given that this sector-wide approach exists, and that compliance with it is already a legal requirement for airlines, the Applicant does not believe that provision of controls on carbon emissions associated with aircraft use through the GCG Framework would be appropriate, as the Government has confirmed</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>that it believes aviation emissions are best dealt with at a national level.</p> <p>In addition, setting a Limit that went beyond the ambition of the UK ETS is also unlikely to be effective. Any further reduction in GHG emissions allowed at the airport from an approach like this would result in fewer aircraft operators using their UK ETS emissions allowances to operate flights to or from the airport. They would however be free to use these allowances to operate to or from other airports. As such, any decreases in GHG emissions from flights operating to or from the airport would simply be offset by equivalent increases elsewhere. This would not help the UK meet its goal of achieving net zero by 2050, nor would it help to address the global effects of climate change. It could also lead to</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>longer surface transport journeys overall as people travel to less convenient airports for flights that might otherwise have been offered at the airport, resulting in greater energy use.</p> <p>Whilst GHG emissions from aviation are not proposed to be included within GCG, the EIA does consider the change in GHG emissions from the increased numbers of flights, including in the context of existing policy and legislation (e.g. forthcoming carbon budget periods).</p>	
Scope – Surface Access						
GCG.1.9	The Thresholds for Surface Access are set in terms of modal shares for public transport for passengers and ‘sustainable transport’ for employees. It would be more transparent if the targets were set in terms of the absolute number of car trips. It is implied that the recorded mode will be		Host Authorities	4	Through the development of the GCG framework, the Applicant has sought to streamline the process as much as possible to minimise the potential administrative and cost burden on both the airport operator and local authorities involved with the process. For the purposes of	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the mode of arrival. It therefore needs to be established whether this will be a reliable metric if large numbers of people kiss-and-ride from the DART terminus or taking a park-and-ride bus from Butterfield Business Park. In both cases, the main trip mode is car				monitoring surface access, it is proposed to build on existing monitoring that feeds into the airport's annual Sustainability Reports. This would mean the continued use of the Civil Aviation Authority (CAA) departing passenger survey to measure passenger mode share, and staff surveys undertaken by the airport operator. Both of these surveys ask for information on 'main mode', i.e. the mode of travel by which the longest distance was travelled. In this way, concerns raised over passengers or staff driving to use the Luton DART or off-site car parking are addressed.	
GCG.1.10	On surface access, NHC asks LR to: - Convert the modal share targets to absolute numbers of car trips. - Consider setting an ambitious target of no net increase in the absolute number of car trips.		North Hertfordshire District Council	4	The Proposed Development is required to mitigate its impact upon the highway network and has proposed capacity enhancement schemes to address the effects of generating trips onto that network. The	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<ul style="list-style-type: none"> - Consider a stretch target of reducing the absolute number of car trips over time. - Consider replacing some or all of the currently proposed schemes to increase road capacity with interventions to increase rail and bus capacity to ensure that they can accommodate growing demand comfortably. - If applicable, count park-and-ride bus trips separately to trips by local and intercity bus services, and count these as half-car-trips. - Monitor how many people who arrive by DART drove, or were driven, to the DART terminus or a local railway station, and count these as car trips. 				<p>Transport Assessment [TR020001/APP/7.02] sets out the junctions where mitigation is required and the intended form of mitigation. In conjunction with this, a monitoring programme will be established to quantify changes in vehicular trip numbers and inform the timing and form of mitigation proposed.</p> <p>The GCG mode share Limits in relation to unsustainable mode share will support the sustainable development of the Proposed Development and seek to minimise the increase in car trips over the lifetime of the Surface Access Strategy [TR020001/APP/7.12].</p> <p>Appendix F Surface Access Monitoring Plan of the GCG Framework [TR020001/APP/7.08] sets out the required methodology for the monitoring and</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>reporting with respect to the GCG surface access Limits, including the approach to trips recorded by park-and-ride, car park shuttle bus and Luton DART.</p> <p>In addition to this, further monitoring requirements are set out in the Framework Travel Plan [TR020001/APP/7.13], including the proposed surveys to be undertaken to inform the development of future Travel Plans, which will consider a number of different metrics to be measured. It is the Applicant's understanding that the CAA survey data will record the information requested in terms of final and main mode. Ongoing dialogue will be held with CAA and feedback sought to ensure granular data is collected that will inform decision making around travel plan measures and targets.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
GCG.1.11	The proposed Green Controlled Growth limit value targets for air quality and carbon emissions resulting from surface access appear to take the forecast increase in vehicle trips as a given, rather than reflect the need for mode shift to contribute to environmental goals including net zero carbon and addressing illegal levels of air pollution. As such, the proposed limit value targets have been determined on a wholly inappropriate basis.	Transport for London			<p>A fundamental principle of the GCG framework is that it secures legally binding limits on the extent of impacts associated with the Proposed Development. This commitment means that any exceedance of the Limits will have significant implications for the airport. On this basis, it is vital that Limits are not set arbitrarily, but are based on a comprehensive forecasting process so that all parties to GCG can have confidence that they will appropriately balance the need to protect the local community and environment, and the delivery of significant socio-economic benefits for Luton and surrounding areas through the Proposed Development.</p> <p>On this basis, it is important that the Limits implemented are aligned with the quantitative forecasts included in the ES</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>[TR020001/APP/5.01] that has been submitted with the application for development consent.</p> <p>It is acknowledged that the approach to surface access at the airport must seek to limit GHG emissions and air quality impacts, and the measures the Applicant can take to support delivery of this are detailed in the Framework Travel Plan [TR020001/APP/7.13] that has been submitted with the application for development consent.</p>	
GCG.1.12	National Highways notes the strategy for Green Controlled Growth in support of the Airport Expansion project and is supportive of proposals that promote environmental sustainability. National Highways requests to be involved in discussions concerning the Green Controlled Growth document that is being produced – and its	National Highways		1	Regular engagement has been undertaken between the Applicant and National Highways and it has been indicated that they are happy and are in agreement with the GCG proposals. National Highways are considering a suggested role on the Surface Access Technical Panel to continue their involvement.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	implementation - as the sustainable modal share target has the potential to affect impacts on the SRN.					
Scope – Air Quality						
GCG.1.13	The plan [GCG] is complex and the variables movable – why only PM10, PM2.5 and NOx emissions to be monitored, for example?	Slip End Parish Council		1	The three pollutants identified are those that potentially have the greatest impact on human health and are identified in the Aviation Policy Framework (Ref 5) as the most important pollutants around airports. Other pollutants, including the remaining pollutants covered by the UK Air Quality Objectives, have been scoped out of the air quality assessment as they are unlikely to cause exceedances of their respective objective levels, as set out in the Scoping Opinion and Scoping Response [TR020001/APP/5.05] . Therefore only these three pollutants have been assessed and impacts	No

Ref	Comment	PC	LA	No PILs	Response	Change
					forecast as part of the application for development consent.	
Limits						
GCG.1.14	If the second Threshold is met, LR must stop increasing airport capacity until it has prepared a Level 2 Plan to ensure further expansion will not lead to a limit threshold being reached. If the Limit (effectively the third Threshold) is met, LR must prepare a Mitigation Plan to bring the relevant environmental metric below the Limit. The plan effectively makes the second Threshold a target, which would render the first Threshold meaningless asks LR to: Explicitly set the first Threshold as the target, to create an adequate safety margin to allow for hysteresis (time lags between drivers and outcomes) and uncertainty about the effectiveness of mitigatory actions (which will, for the most part, be untested).		North Hertfordshire District Council	1	It is not considered that the Level 1 Threshold is meaningless. A fundamental principle of the GCG framework is that, as the magnitude of a particular environmental effect increases, a series of checks and balances are implemented as the airport continues to grow. The purpose of the Level 1 Threshold is therefore that as the degree of an environmental impact approaches (but is still some way short of) the Limit, as determined by annual monitoring, the monitoring report must include commentary on the avoidance of the exceedance of the limit. More onerous requirements are then triggered by the exceedance	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>of a Level 2 Threshold sitting closer to the Limit, including a requirement on the airport operator to produce a Level 2 Plan, confirming that the relevant impact no longer exceeds the relevant Level 2 Threshold and ensures that any future airport capacity declaration (being runway capacity) does not increase from the existing capacity declaration.</p> <p>Stopping growth at the Level 1 Threshold as suggested would not only make the Level 2 Threshold meaningless but would also constrain growth at the airport when a Limit was not close to being breached. As such, it is not considered that the suggested change is appropriate.</p> <p>Further information is available in the GCG Explanatory Note [TR020001/APP/7.07].</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
GCG.1.15	Environmental metrics will follow utilised capacity, not available capacity. There will be a time lag between additional capacity being made available at the airport and that capacity being fully utilised. Environmental limits could therefore be exceeded sometime after additional airport capacity has been made available asks LR to: Refine the plan to provide greater certainty that environmental metrics will not be exceeded.		North Hertfordshire District Council	1	The GCG framework has been designed with exactly this point in mind, and set out a process by which, as the magnitude of a particular environmental effect increases, a series of checks and balances are implemented as the airport continues to grow. This is intended to ensure that the extent to which an effect is occurring can be controlled as it approaches a Limit, with the ultimate intention that the Limit is not exceeded.	No
GCG.1.16	If a Mitigation Plan fails, environmental Limits could be exceeded indefinitely with no direct consequences for LR beyond not being able to expand airport capacity further. NHC asks LR to: Add an additional step that, should a Mitigation Plan fail to achieve its objective within an agreed period of time, airport capacity must be ratcheted down until environmental targets are no longer exceeded		North Hertfordshire District Council	1	At London Luton Airport, in common with all London airports, the number of flights operating is determined by the number of available 'slots', which is defined by legislation. Ownership of a slot allows an airline or other aircraft operator to operate a flight at a specific time to or from the airport. Luton is a 'co-ordinated' airport, which means that the process of allocating and co-ordinating	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>slots at the airport is carried out by a third party, Airport Co-ordination Limited (ACL). The process by which slot co-ordination is carried out is established in UK law, and the GCG Framework has been designed in this context.</p> <p>In particular, slot allocation legislation means that where an airline has operated a flight in a slot for at least 80% of the time in the preceding season, it is entitled to the same slot for the following season (known as 'grandfather rights'). These slots cannot therefore be removed as is suggested under the current legislation.</p> <p>However, where a Limit has been exceeded, both capacity declarations and local rules could be used in the context of the slot allocation process to manage environmental impacts, subject to respecting grandfather rights. More</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					information can be found in Section 2.6 of the GCG Explanatory Note [TR020001/APP/7.07] , which sets out how the GCG Framework [TR020001/APP/7.08] will interact with the slot allocation process, which underpins how growth happens at the airport.	
GCG.1.17	NHC asks LR to: Agree with local authorities the capacity increment sizes and minimum time intervals between increases. The aim would be to ensure that the full environmental impacts are observed before capacity is increased further.		North Hertfordshire District Council	1	It is important that the airport operator retains control of when and how growth is implemented at the airport, subject to any restrictions imposed through a Level 2 Plan or Mitigation Plan where environmental impacts are close to or exceeding a Limit. This allows the airport operator to plan and implement growth according to prevailing conditions and commercial considerations, which will be important in ensuring that the Proposed Development is viable and delivers economic benefits to	No

Ref	Comment	PC	LA	No PILs	Response	Change
					communities around the airport.	
GCG.1.18	Noted that each phase, with increased airport use and potentially higher impacts, matches a correspondingly lowered forecast impact. This is encouraging (if a little counter intuitive).		Host Authorities	4	The Limits proposed as part of the GCG Framework are informed by the comprehensive forecasting of the impacts of the Proposed Development undertaken to inform the EIA. As such, some Limits increase between assessment phases and some decrease, dependent on the level of forecast impacts. In some areas, forecast impacts will decrease despite an increase in passenger throughput; for example, between assessment Phases 1 and 2a surface access related GHG emissions are forecast to decrease due to increase uptake of electric vehicles, despite more people travelling to and from the airport.	No

Ref	Comment	PC	LA	No PILs	Response	Change
GCG.1.19	It is not clear how limits on flight operations can be applied equitably (and legally) to a range of flight operators.		Host Authorities	4	Please refer to the response to Ref GCG.1.16.	No
GCG.1.20	Agree with the concept of setting limits and thresholds and the development of plans to ensure that limits are not exceeded.		Buckinghamshire County Council	1	Noted.	No
GCG.1.21	Limits should evolve over time to take into account technological/operational changes and changes to external constraints that have not been predicted at the DCO stage that allow limits to be reduced in the future. Limits set at the DCO stage should not under any circumstances be allowed to be raised upwards to worsen environmental impacts.		Buckinghamshire County Council	1	<p>The Applicant agrees there is a need to provide for elements of the GCG Framework to be reviewed and potentially updated following the grant of development consent and this has been provided for in the GCG Framework [TR020001/APP/7.08], included in the application for development consent.</p> <p>Different approaches are proposed with the different environmental topics within GCG, responding to how Limits in these areas have been derived. For example, the air quality Limits must be reviewed if there is a future</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					change to the UK legal limits, and the noise Limits must be reviewed where there is a change in circumstances that could affect the aircraft noise experienced by communities around the airport, such as the publication of a new ICAO 'noise chapter.' Full details of the required review mechanisms and circumstances in which they must take place are set out in the GCG Framework [TR020001/APP/7.07] . In all cases, there will be no ability to change any of the Level 1, Level 2 Thresholds or Limits to permit materially worse environmental effects than those identified in the ES [TR020001/APP/5.01] .	
Transition Period						
GCG.1.22	[Buckinghamshire County Council] are not convinced of the logic of not applying Level 2 thresholds and limits within the first 24 months of the transition period. This effectively means		Buckinghamshire County Council	1	The GCG Framework is innovative and require the airport operator to undertake a number of new processes. The Applicant believes that a Transition Period is therefore	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>that limits could be breached in the first two years without any plan being put in place to bring them under control. By time the plan is agreed and implemented this could potentially mean breaches of agreed limits for 3-4 years.</p>				<p>appropriate to allow these processes to 'bed-in' and ensure they are working correctly. The concern expressed in the response is noted, but it would not be in the airport operator's interest to exceed Limits during the Transition Period as this would then constrain growth for a significant period after the end of the period, as the response recognises. The airport operator would also remain subject to the Level 1 process, through which they would need to demonstrate that the implementation of growth at the airport would not result in a Limit being breached.</p>	
Level 1 and Level 2 Plans and Mitigation Plans						
GCG.1.23	<p>Fundamental to all environmental concerns is the CGC plan, a proposal for an 'independent' body to monitor four areas of environment and mandate as necessary (or quasi-independent as it</p>	Slip End Parish Council		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	happens, with LBC both the owner of the airport and represented on the monitoring panels – the comment on ‘marking our own homework’ on page 3 is appropriate humour).					
GCG.1.24	Obviously independent scrutiny is essential and should have been introduced years ago, a point made by Stevenage Borough Council in Response Appendix 2 (5.1.20) For LLAOL it must now be expedient to have such a plan, in a situation where both the plan and its implementation remain in the hands of the operators. Given the past record of LLAOL on environmental matters we can have little optimism about the outcome.	Slip End Parish Council		1	Noted. it is agreed that independent scrutiny is important, and this is a fundamental aspect of the GCG Framework.	No
GCG.1.25	this Council is not convinced, from the information contained in the consultation, that this process provides any controls that are not already available to the local planning authority through the effective enforcement of development via s.106 agreement and		St Albans City and District Council		The GCG proposals have developed significantly since the 2022 statutory consultation, taking on board feedback comments received such as this. The GCG Framework [TR020001/APP/7.08] and GCG Explanatory Note	No

Ref	Comment	PC	LA	No PILs	Response	Change
	planning conditions. There are insufficient details at this stage as to how the GCG would operate and the make-up of its proposed monitoring body (the 'Environmental Scrutiny group') would need to ensure that it has genuine independence from the airport operator and that local community representation is adequately included.				[TR020001/APP/7.07] provide much more detail about how the process will work and the governance and management arrangements.	
GCG.1.26	The airport has consistently ignored legal limits in the past. Why then should we trust that GCG will do what it says when this has been promised again and again, and again and again, legally binding limits have been ignored and without consequences.	Kings Walden Parish Council		1	Compliance with existing planning conditions is a matter between the current operator, LLAOL, and the local planning authority, LBC, not the Applicant, Luton Rising. Nevertheless, the Applicant has recognised that this is an important issue to local communities and is one of the reasons for developing the proposed GCG framework. A key part of the GCG Framework is that they become legally binding. It is proposed that this achieved through specific 'provisions' of the DCO. These provisions can legally require certain	No

Ref	Comment	PC	LA	No PILs	Response	Change
					activities to be undertaken at certain times, and failure to do so would be a legally enforceable breach of the Order. Further information can be found within the GCG Framework [TR020001/APP/7.08] .	
GCG.1.27	In pursuing ... this methodology the CCB would want to know just how such binding commitments can be enforced. If by section 106 planning obligation agreements or by planning condition, for example, then such mechanisms are open to variation.	Chilterns Conservation Board			It is proposed to secure the GCG Framework approach through provisions contained within the DCO, as set out within the GCG Framework [TR020001/APP/7.08] . Whilst, as with Section 106 agreements or planning conditions, it is possible to vary a development consent order through an application for a material or non-material amendment, this would require consultation and engagement with a range of stakeholders (as defined by the Planning Act 2008), and a decision would be made by the Secretary of State on the basis of prevailing policy and guidance at the time.	No

Ref	Comment	PC	LA	No PILs	Response	Change
GCG.1.28	The green controlled growth strategy and its enforcement or compliance mechanisms needs to be contained within one document, linked to chapters within the ES.	Chilterns Conservation Board			The GCG Framework approach forms part of an independent document [TR020001/APP/7.08] submitted as part of the application for development consent.	No
GCG.1.29	The new focus on Luton Rising's 'Green Controlled Growth' sustainable development proposals, which involve a licence to expand only being granted subject to being within prescribed environmental controls, is welcomed provided that satisfactory monitoring, management and mitigation measures are put in place to ensure compliance within those limits.		East Hertfordshire District Council	1	Noted.	No

Table A4.2: Regard had to statutory consultation responses on GCG comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
General				
GCG.2.1	Respondents state that they are happy with the Green Controlled Growth proposals.	3	Noted.	No
GCG.2.2	DHL shares the commitment of Luton Rising to grow in a responsible and sustainable way and supports the Green Controlled Growth approach which has been set out. DHL has long been working towards net zero following the adoption of the DPDHL Group's target in 2017 for net zero logistics by 2050. In 2021 the Group aligned the target with the Science Based Targets Initiative and signed up to the Race to Zero. We have stretching interim targets for 2030 alongside a commitment to invest 7 EUR billion in clean operations. As part of this in March 2022 DPDHL committed to invest in more than 800 million litres of Sustainable Aviation Fuel over the next five years in collaboration with BP and Neste. The investment is expected to save approximately 2 million tonnes of CO2 over the aviation fuel lifecycle, equivalent to the annual greenhouse gas emissions of around 400,000 cars.	1	Noted.	No
GCG.2.3	The green growth plan presented by Luton Airport is in line with Wizz Air UK's vision and mission of sustainable growth and we would like London Luton to become the greenest airport in the UK with the utilization of our new aircraft.	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
	As the most sustainable airline, Wizz Air supports sustainable growth and we support the proposal's measures to mitigate any detrimental impact it has on the environment.			
GCG.2.4	The Jet Zero consultation highlights a general principle of support for growth that is environmentally sustainable, rather than constraining aviation growth to suppress aviation's environmental impact. The Green Controlled Growth Framework outlined by the Applicant is consistent with this theme, having been designed to control the impact of aviation growth.	1	Noted.	No
GCG.2.5	Suggestions to enhance the outlined approach to environmental protection during and post-expansion. LLAOL requests that a consistent definition of the term "Airport Operations" is adopted. Via this new definition, a clear distinction is required between operational aspects under the control of LLAOL as the operator of the airport, and 'other operations' which are not under the control of LLAOL. This distinction is required across all documentation, but is particularly important in context of Greenhouse Gas (GHG) emissions, to align the Future LuToN plans with the airport's annual monitoring reporting and with globally recognised industry frameworks.	1	As part of the application for development consent, care has been given to understand where the Applicant's definition of 'airport operations' is inconsistent with those adopted through the international Airport Carbon Accreditation framework, as well as emerging guidance through the UK Government's Jet Zero Strategy (Ref 6). Definitions within GCG are now aligned.	Yes

Ref	Comment	No. PILs	Response	Change
GCG.2.6	Green Controlled Growth (GCG) is a pragmatic means of controlling the potential environmental impacts of the proposed development whilst at the same time allowing growth and the benefits that such growth will bring. The approach recognises potential uncertainties which are inevitable given the long-term nature of the proposals and the rapidly evolving technological environment in which the aviation industry is operating. For this reason, LLAOL is supportive of this approach and embraces the principle of growth that is controlled under clear conditions around the monitoring of air quality, GHG emissions, noise and surface access.	1	Noted.	No
GCG.2.7	From the perspective of an operator the GCG plan should be simple and transparent, allowing effective operation of the airport combined with easily understood publication of compliance documents. Specific measures such as (but not exclusively) the provision of 'green slots' and increases in the provision of electric car charging points for colleagues should be discussed with LLAOL to ensure deliverability as well as a better understanding of the costs associated with such commitments.	1	The Applicant has worked to make the GCG process as transparent as possible and to reduce the administrative burden on all parties to the process. As part of the preparation of the GCG framework, discussions were undertaken with a wide range of stakeholders to ensure that the proposals will be deliverable.	No
GCG.2.8	LLAOL supports the proposal that the GCG (including any associated costs and obligations) will only apply to growth above the consented baseline position as of the date the DCO is	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
	granted and which is implemented under the terms of the DCO.			
Impact				
GCG.2.9	Concern that GCG Framework are inadequate and/or will not make a difference to key environmental issues including noise impacts and climate change.	12	<p>The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport. As such, it has developed GCG Framework to ensure that growth can take place at the airport, but not at any cost.</p> <p>GCG would ensure that growth only takes place within strict environmental limits. The airport operator would be required to periodically monitor and report on the extent of impacts associated with the airport in the four limit areas.</p> <p>If monitoring were to suggest at any point that these limits were in danger of being breached, then plans must set out how that breach would be avoided. If environmental limits were ultimately breached, further growth would be stopped, and mitigation required.</p> <p>Through this approach, the Applicant will ensure that limits relating to environmental impacts, including noise impacts and climate change, are respected.</p>	No

Ref	Comment	No. PILs	Response	Change
GCG.2.10	Concern that implications of the Application such as closure of Wigmore Tidy Tip does not adhere to the Green Controlled Growth credentials as it forces residents to travel further, e.g., to Stevenage.	1	The Tidy Tip (formally called the Eaton Green Civic Amenity Site) is not being relocated, but the access point will be relocated to better integrate with the revised highway network. Access to the Tidy Tip, beyond its actual entry point from the surrounding road network, will not be constrained or limited.	No
Assessment				
GCG.2.11	The GCG framework is too strict and will hinder the ongoing operation and growth of the airport.	1	<p>The GCG Framework has been developed to ensure that growth can take place at the airport, but not at any cost. It is acknowledged that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport.</p> <p>As such, the Applicant has taken care to propose both a framework that can deliver growth, but only where environmental limits are respected. The limits proposed through the GCG approach are informed by the comprehensive forecasting of the impacts of the Proposed Development undertaken to inform the EIA. As such, whilst they take into account the extensive measures taken to both reduce and mitigate the impacts of the Proposed Development detailed in the ES [TR020001/APP/5.01], they have also been based on robust and realistic assumptions around</p>	No

Ref	Comment	No. PILs	Response	Change
			future airport operations to ensure that they are deliverable.	
GCG.2.12	Concern that GCG limits will not be effective and amount to greenwashing as it cannot control or mitigate carbon emissions associated with aircraft use, the impact of which will increase with future expansion and more flights.	15	<p>The Applicant's GCG Framework mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, GHG emissions and surface access are respected. The Applicant is determined that the airport should play its role in decarbonising UK transport and the economy generally, and as such it is proposing that both emissions associated with airport operations and surface access will be controlled through GCG.</p> <p>Please refer to the response to Ref GCG.1.8.</p> <p>The Applicant remains committed to supporting the industry to decarbonise. The Sustainability Statement [TR020001/APP/7.06] submitted as part of this application for development consent, sets out the steps taken both to embed measures to reduce GHG emissions, as well as to future-proof proposals to help support the future implementation of new technology.</p>	No
GCG.2.13	Concern that GCG limits have not been applied to Caddington.	1	The GCG Framework mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, GHG emissions and surface access are respected. As such, GCG will benefit residents of Caddington through managing these impacts.	No

Ref	Comment	No. PILs	Response	Change
Scope – GCG				
GCG.2.14	LLAOL is wholly supportive of proposals to ensure that Net Zero is achieved by 2040 for Scope 1 and 2 emissions (GHG PEIR 12.12.4). LLAOL would welcome engagement with the Applicant to ensure that the proposed GHG emissions measures are realistic and deliverable.	1	Noted. Further engagement has been held with LLAOL in respect of the approach to Scope 1 and 2 emissions.	Yes
GCG.2.15	LLAOL would strongly advocate flexibility in the means of achieving the required emissions reductions such that the most efficient and cost-effective technology (particularly in the context of energy production) can be adopted by the operator and its partners (e.g., power suppliers). It offers no particular benefit to restrict the means of decarbonising operations and as such specific requirements for on or offsite renewable energy generation should be removed in order that the optimal solution can be adopted.	1	Noted. It is agreed that the airport operator should have flexibility in respect of how decarbonisation is achieved, and it is not intended to restrict this through the Proposed Development.	No
GCG.2.16	LLAOL is supportive of wider efforts on the part of Government and airline partners to minimise Scope 3 emissions from aviation and agrees that Scope 3 emissions should not be within the scope of the GCG Framework. This on the basis that Scope 3 emissions will be necessarily controlled at the national level and under current plans will be part of the UK Emission Trading Scheme (ETS) or another national mechanism allowing the Government to meet its legal obligations.	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
GCG.2.17	LLAOL is further supportive of the proposal that residual Scope 3 emissions (i.e., those from surface access) are controlled as a net limit, allowing offsetting as necessary. Passenger surface access contributes around 50% of LLAOL's total carbon footprint, thus LLAOL is committed to promoting sustainable travel to and from the airport.	1	Noted.	No
Scope – Surface Access				
GCG.2.18	Whilst LLAOL is supportive of/committed to the principle of increasing sustainable transport to the airport, it does not consider that growth should be conditioned on modal share given the potential absence of correlation between growth, modal share and environmental impacts. Whilst useful proxies, the mode share targets themselves do not necessarily correlate to environmental/traffic impacts. For instance, it's possible that a mode share performance that is in breach of the 40% or 45% GCG Limit (dependent upon the relevant Phase at the time) would still avoid any unacceptable environmental/traffic impact given the performance of the wider transport network at the time and in such circumstances, the operations would then be unnecessarily restricted.	1	<p>The purpose of including surface access within the GCG framework is to manage the impacts of the Proposed Development on the highway network surrounding the airport. While it is acknowledged that there is not a direct correlation between mode share and highways impact, it is considered that this is a useful proxy that can be measured using existing processes. Trying to measure and isolate the direct impact of the Proposed Development on congestion would in contrast be extremely difficult, and open to challenge. As such, it is believed that the current approach of using mode share as a proxy for this is correct.</p> <p>Whilst there are positive socio-economic effects driven by passenger growth, as referenced in the Need Case [TR020001/APP/7.04], there is still the potential for negative effective associated with</p>	No
GCG.2.19	Similarly, whilst LLAOL supports the encouragement of airport staff to use public	1		No

Ref	Comment	No. PILs	Response	Change
	transport, staff modal share in particular will have limited impact on road congestion and it would be disproportionate for an exceedance of the staff modal share Level or Limit to result in growth being halted.		surface access to be experienced by local communities, and the Applicant considers it important that there is a control mechanism for these effects within the GCG Framework [TR020001/APP/7.08] .	
GCG.2.20	LLAOL would suggest a different approach is taken with surface access under GCG with a limit on growth not the ultimate sanction in the same way as for the other limits. LLAOL would welcome the opportunity to discuss this further with the Applicant post consultation, with a view to implementing an approach that pays due care to the local community in terms of air quality and congestion, whilst not unduly penalising the operator (and in turn the community by preventing the positive effects that passenger growth will drive)	1		No
GCG.2.21	The impact of Covid on surface access travel behaviours presents a hurdle in the use of sustainable and public transport modes, over which the operator has very little control. Regard should be given to unforeseen future factors such as this within the GCG framework, including any decision-making by the [Environment Scrutiny Group] ESG were a Limit breach to occur (and also in respect of the Air Quality Limit (where necessary)); LLAOL suggests that the Applicant works with it to ensure appropriate benchmarking	1	It is acknowledged that there may be circumstances where the extent of the environmental impact of airport operations will be affected by factors beyond the airport operator's control. The Applicant has sought to ensure that the GCG framework recognises this and will not penalise the airport operator where this is the case.	No

Ref	Comment	No. PILs	Response	Change
	information is taken into account, such as CAA data across other UK airports.			
GCG.2.22	As a more general principle, action should not be taken in respect of an exceedance of a Level or a Limit where the cause of the exceedance is outside of the operator's control or is temporary in nature	1	Please refer to the response to Ref GCG.2.21.	No
GCG.2.23	LLAOL notes within "Table 6-1: Summary of interventions" table of the Surface Access Emerging Transport Strategy the proposals for the Applicant to be responsible for a number of commitments, for example, regarding improvements to walking and cycle access, e-vehicle infrastructure and giving support to the operator to work with surface access partners to improve public transport routes. It is important that the Applicant meets those commitments in order for the operator to remain within the proposed Limits. In addition, LLAOL would welcome further discussion with the Applicant to discuss all commitments which are proposed to be "delivered by or in partnership with third parties."	1	Noted. The Mitigation Route Map [TR020001/APP/5.09] explains the way in which the mitigation measures described in the application for development consent will be secured.	No
GCG.2.24	LLAOL has no control over off site car parking operated by third parties. Significant efforts can be made on the part of the operator to encourage sustainable transport use, but these efforts can be undermined by low-cost parking offers and/or	1	Please refer to the response to Ref GCG.2.21.	No

Ref	Comment	No. PILs	Response	Change
	attractive products provided by third parties, with the result being a higher than anticipated private car share. Due regard should be given to this complexity within any decision-making on the part of the ESG.			
GCG.2.25	LLAOL supports the proposal that staff modal share Levels/Limits should not be defined until sufficient analysis of the current baseline and Covid impact is assessed and LLAOL would welcome discussion with the Applicant on these issues. LLAOL notes that staff travel behaviours are likely to be impacted by Covid for at least the near and medium term. LLAOL expects staff travel modal share to take longer to return to pre-Covid levels when compared to passenger modal share, given the regularity of staff transport to LLA compared to passenger travel. This needs to be taken into account when the Limits are set.	1	<p>The staff mode share Limits are set out within the GCG Framework, corresponding to the forecast mode shares utilised within the transport modelling and reported in the Transport Assessment [TR020001/APP/7.02], which reflect the ‘reasonable worst case’ that has been assessed. These forecast mode shares are still considered appropriate for the purpose of the assessment in light of the variation in travel patterns observed as a result of the COVID-19 pandemic.</p> <p>However, a distinction has been made between the GCG Limits and additional surface access targets, set out in the Surface Access Strategy [TR020001/APP/7.12] and Framework Travel Plan [TR020001/APP/7.13]. The value for the targets will be set during the production of the first Travel Plan, secured by requirements in the Draft DCO [TR020001/APP/2.01], in accordance with the process and principles set out in the Framework Travel Plan. This will ensure that the most up-to-date survey information is used as the baseline from which future targets will be set.</p>	No

Ref	Comment	No. PILs	Response	Change
GCG.2.26	LLAOL supports the proposal for the passenger modal share to be monitored by utilising the existing CAA Departing Passenger Survey. The monitoring of staff modal share should be developed in consultation with LLAOL as the operator.	1	Noted.	No
Scope – Air Quality				
GCG.2.27	LLAOL recognises the need to maintain local AQ within limits defined by the UK Air Quality Objectives. LLAOL welcomes the acknowledgement that changes to local AQ cannot be assumed to be as a direct result of the airport and agrees that it will be necessary to investigate and determine the cause of any exceedances before any further action is required. There should be no obligation on the airport operator to take action or have restrictions placed on the airport's operations where it is not clear that the airport has caused the exceedance.	1	This is acknowledged. The GCG Framework [TR020001/APP/7.08] sets out the process for monitoring and reporting on air quality impacts, acknowledging that these impacts will not always be airport related.	No
GCG.2.28	LLAOL broadly agrees that an appropriate AQ monitoring and reporting strategy is set out within the Draft GCG Framework. However, LLAOL would welcome the opportunity to discuss the proposals further, particularly in terms of the proposed monitoring regime and the potential complexities around differentiating between airport and non-airport related impacts.	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
Scope – Noise				
GCG.2.29	When it comes to the GCG proposals it is essential that the right controls are used which contain the necessary actionable levers for the operator to plan and react to noise impacts. This would reduce the risk of unexpected breaches and contribute to developing and maintaining effective relationships between industry and local community stakeholders.	1	This is acknowledged. The approach to addressing noise impacts through GCG has been developed in consultation with the Noise Envelope Design Group. Through this process, the Applicant sought to reflect the views of a wide range of stakeholders, with noise controls chosen appropriately.	No
GCG.2.30	The Draft GCG document explains that with forecasts a level of uncertainty is to be expected, and whilst ongoing spot checks on noise contours can be carried out, there are limitations to the actions that can be taken mid-season due to the “grandfather rights” airlines hold over slots that would prevent a breach of threshold or limit.	1	Noted.	No
GCG.2.31	LLAOL draws the Applicant’s attention to the 2018 Green Paper, which explains differences between using noise quota and noise contours as a means of determining the performance of industry in reducing noise. Noise quota is a bona fide measure of aircraft noise output, as it is not affected by destination choice or runway usage in the same way that noise contours are. Noise Quota limits also afford the ability of setting a scheduling limit to significantly reduce the risk of breaches where there is no opportunity to do this with a contour limit.	1	Please refer to the response to Ref GCG.2.29. It is acknowledged that Quota Counts are an important tool for planning and scheduling flights within the context of limiting noise around the airport. However, the principle of GCG is that it controls the actual environmental impact of the Proposed Development on communities around the airport. On that basis, the Applicant believes that noise contours are the appropriate basis for the noise limit, allowing an assessment of the true noise performance of the airport.	No

Ref	Comment	No. PILs	Response	Change
GCG.2.32	Noise contours are sensitive to factors outside the control of the airport and/or airline such as weather, which may affect runway direction, profile and heading; and market forces which affect route distribution. It is therefore suggested Quota Count Limits are used instead of noise contours. Quota Count Limits will provide one definitive measure for noise impact that is unaffected by external influence.	1	Please refer to the response to Ref GCG.2.31.	No
GCG.2.33	Any metric where there are multiple variables outside of the operator's control presents a greater risk to breaches. It is therefore essential that the system is flexible and/or contains suitable allowances for such factors to ensure deliverability of noise reductions as well as facilitating growth.	1	Please refer to the response to Ref GCG.2.29. It is acknowledged that noise impacts from the airport are affected by factors beyond the control of the airport. To address this, the Applicant has sought to build in appropriate allowances for these factors, for example reflecting DfT guidance on dispensations from night-time noise restrictions.	No
GCG.2.34	LLAOL supports the proposal for exemptions to provide a similar dispensation system to that which is set out in Government guidelines. Exemptions should be appropriate to cover all relevant controls where circumstances are beyond the control of the airport operator. LLAOL would welcome the opportunity to engage further on this topic, including a discussion on the assumptions underlying the noise impact assessment and the deliverability of those assumptions, such as fleet mix. LLAOL also supports the proposal for ongoing monitoring of	1	Noted. Further engagement with LLAOL has been held on this matter.	Yes

Ref	Comment	No. PILs	Response	Change
	the GCG noise measurements to be per the current monitoring system in place at London Luton Airport.			
Limits				
GCG.2.35	We believe that the GCG Limits should be set at the upper limit of the range detailed in the Consultation Document.	1	We are proposing that the magnitude of each Limit is aligned with the assessment results from the faster growth sensitivity test, in which passenger demand rises quicker than forecast in the Core Planning Case and higher passenger throughput occurs earlier than predicted. This is considered to represent a 'reasonable worst-case' scenario for the Limits to be based upon. The purpose of this approach is to recognise that some of the effects of the Proposed Development will change over time in line with growth at the airport, and that the environmental effects experienced would be no worse than those forecast within this upper bound scenario.	No
GCG.2.36	Regarding the GCG Framework, LLAOL embraces its principle in enabling growth that is controlled under clear conditions. It is crucial that the GCG Limits are set at a level that enables a realistic growth profile that adequately responds to market demand, whilst enabling protection of the environment within the agreed tolerances and positively contributing to the local community. With this in mind, LLAOL has commented on the triggers applicable to Phase 1 and Phase 2a and the phasing of the Limits to avoid cliff edges. It is also critical that the GCG Limits be set at the Faster Growth Case level. We also consider the Faster Growth Case to be a realistic growth profile and request that the Applicant works with LLAOL to confirm forecasts to optimise the airport.	1		No
GCG.2.37	LLAOL believes that the Phase 1 trigger should be the point at which passenger throughput reaches 23 mppa, rather than the proposed 21.5mppa, since 23 mppa has been assessed as	1	The Phase 1 trigger is the point at which commercial throughput reaches 21.5 mppa, consistent with the assessment of Phase 1 in the EIA. However, the values of the Limits for this	No

Ref	Comment	No. PILs	Response	Change
	<p>a faster growth scenario and LLAOL believes this represents a realistic growth scenario for Terminal 1 and would result in the most value for all stakeholders, including the Applicant and the Luton community. In turn, the Phase 2a trigger should be the point at which the passenger throughput reaches 29mppa, rather than the proposed 27mppa. It is understood that extensive highway works are required at the 29-30mppa throughput mark, thus this suggestion aligns a phase 'gateway' with required highway works, whilst also ensuring appropriate gaps between the phases. LLAOL agrees that Phase 2b is the point at which 32mppa throughput is reached.</p>		<p>Phase are based on the faster growth case, which assumes a passenger throughput of 23 mppa. Setting Phase 1 at the lower level of throughput ensures that Terminal 1 is operating at its design capacity and that as a result, the environmental impacts associated with ongoing operation in Terminal 1 will be controlled at an earlier stage. However, aligning the value of the Limit with the higher level of throughput in the Faster Growth case means that the airport operator will have sufficient flexibility in the value of the Limit to implement faster growth.</p> <p>The Phase 2a trigger has been set at 27 mppa, consistent with the assessment of Phase 2a in the EIA. 29 mppa is not directly modelled or assessed and so there would be no quantitative forecasts on which to base the values of the Limits.</p>	
GCG.2.38	<p>LLAOL notes the indicative range of Limits is based on the Core Planning Case and the Faster Growth Case as set out in the Needs Case. As the operator, LLAOL is well-placed to determine passenger growth scenarios. LLAOL supports the Faster Growth Case being the Core Planning Case within the DCO Application. However, in any event, LLAOL believe it is critical that the Limits be set at the Faster Growth Case level to ensure that GCG is balanced in providing strict environmental limits, whilst still providing for realistic growth which makes best use of the</p>	1	Please refer to the response to Ref GCG.2.35.	No

Ref	Comment	No. PILs	Response	Change
	infrastructure for the benefit of the community. In addition, based on LLAOL's analysis, it is concerned about the achievability of GCG Limits set at the Core Planning Case level. Setting the GCG Limits appropriately is key to ensuring a successful airport expansion.			
GCG.2.39	LLAOL agrees that Limits should not step down or up in a single year and should allow for changes to occur gradually. LLAOL supports the proposal that the value of the Limits between each Phase should be set according to the highest level of forecast impact associated with the Phase preceding or following. For the same reason, where a Phase Limit increases (because the effect of expansion increases in line with growth) for an area, then the Limit should increase up to that Limit rather than having a cliff edge down to more restrictive Limits preceding it.	1	Noted.	No
GCG.2.40	<p>Using the Noise daytime proposed upper limit of the indicative Limit ranges in the draft GCG Framework as an example of the proposal set out in 6.4 above:</p> <ul style="list-style-type: none"> • The current upper-end Phase Limits are as follows: The Phase 1 Limit is 39.1; Phase 2a is 32.8 and Phase 2b is 37. • The proposed Limits that should apply are as follows: <ul style="list-style-type: none"> o The Limit that applies until Phase 2a has commenced is 39.1.; 	1	The approach for setting noise Limits in the Noise Envelope has been updated and is set out in the GCG Explanatory Note [TR020001/APP/7.07] . The noise Limits are informed by the reasonable worst-case assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] so that the noise effects experienced will be no worse than those forecast within this 'reasonable worst case' scenario. The Limits have been set in five-year cycles, to align with the ongoing need under the Environmental Noise Regulations to publish	No

Ref	Comment	No. PILs	Response	Change
	o Once Phase 2a is triggered, the Limit should be 37 onwards (to reflect the Phase 2b Limit). Otherwise there would be 'cliff edge' from Phase 1 (39.1) down to 32.8 upon Phase 2a occurring and then up again to 37 after Phase 2b and onwards.		strategic noise maps and a Noise Action Plan (NAP) every five years. This five-year cycle avoids a 'cliff edge' as there are more regular steps than in the three assessment phases as described in the comment.	
GCG.2.41	Whilst avoiding the 'cliff edge' drop, the above is consistent with what is proposed by the Applicant (and wholly supported by LLAOL): that is, an airport with a sizeable increase in passenger throughput, but with less environmental impact than today's airport. The significance of this outcome (a result of the GCG Framework) cannot be understated when the DCO Application is submitted, and a 'cliff edge drop' is not required to reach this outcome.	1		No
GCG.2.42	LLAOL appreciates that Level 1 Thresholds provide an additional layer of protection to ensure that growth is undertaken within the Limits. However, the Level 1 Thresholds should not be set too low in order to provide a proportionate and efficient means (for all involved parties) of monitoring and controlling growth, given it is below both the Level 2 Threshold and the Limit. Similarly, LLAOL supports the proposal that the Level 2 Thresholds should be set close to the Limits. LLAOL notes the proposal for the Limits to be reviewed periodically and if necessary adjusted over time (in either direction, as	1	Level 1 Thresholds have been set at the level set out in Section 2 of the GCG Framework [TR020001/APP/7.08] . Any changes to Limits should be agreed by both the environment Scrutiny Group (ESG) and the airport operator. The approach for setting the Level 1 and Level 2 Thresholds in the Noise Envelope is set out in the GCG Explanatory Note [TR020001/APP/7.07] . The thresholds have been set relative to the Limit, as the Thresholds will work together with the Limits to control noise in line with the reasonable worst-case assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The	No

Ref	Comment	No. PILs	Response	Change
	considered appropriate). LLAOL proposes this should be done with the involvement and agreement of both the ESG and the operator.		Noise Envelope also contains a mechanism for the Limit to be reduced in future years (beyond the 2030s) if 'next generation' aircraft are quieter than existing 'new generation' types, or an airspace change is implemented that would enable lower noise levels to be achieved than that forecast in the reasonable worst-case assessment reported in the ES [TR020001/APP/5.01] .	
Monitoring				
GCG.2.43	Concern that there is a lack of detail regarding how GCG limits will be complied with and/or how the limits will be enforced.	13	<p>The proposed Limits for GCG have been set by the Applicant, not LBC, and the approach to setting those Limits has been developed through engagement with a range of stakeholders, of which LBC is just one.</p> <p>It is for the Planning Inspectorate and Secretary of State for Transport, who are both independent of the Applicant and LBC, to determine whether the proposed Limits are appropriate in the context of the Proposed Development.</p>	No
GCG.2.44	Concern that GCG levels will not be met as Applicant has failed to adhere to previous/existing levels.	3	Compliance with existing planning conditions is a matter between the current operator and the local planning authority, LBC and not the Applicant. Nevertheless, it is recognised that this is an important issue to local communities and is one of the reasons for developing the proposed GCG framework. A key part of the GCG Framework is that they become legally binding. This will be	No

Ref	Comment	No. PILs	Response	Change
			achieved through securing GCG requirements through specific 'provisions' in the DCO. These provisions can legally require certain activities to be undertaken at certain times, and failure to do so would be a legally enforceable breach.	
GCG.2.45	LLAOL supports the proposal that the initial monitoring plan should be approved as part of the DCO rather than be subject to ESG approval. Any changes to the monitoring plans should only be made on the application of the operator to the ESG for approval, and such approval should not be unreasonably withheld or delayed. The operator should also be able to make amendments that don't adversely affect the effectiveness of monitoring without ESG approval.	1	The support for this aspect of the Proposed Development is welcomed. It is proposed that changes to the monitoring plans would be made only via an application from the operator to the ESG as suggested. However, to ensure independent oversight of the proposals, it is considered necessary that all such changes have ESG approval.	No
GCG.2.46	LLAOL supports the proposal that there should be an Annual Monitoring Report as a full 12-month period of data is required for reliable monitoring. For efficiency for the both the operator and the ESG and Technical Panels, there should be one Annual Monitoring Report to cover all the GCG Limits and the timing of the report should align with the availability of the monitoring data on the Noise Limits, as that is for a specific 92-day period, and be consistent with the operator's current reporting timeline for noise. The timing of the review of the Annual Monitoring Report and any procedure following an exceedance of the Levels or Limits must take into account the timing	1	The support for this aspect of the Proposed Development is welcomed, and the points made around timing of noise reporting and slot declarations are acknowledged. In developing the GCG Framework, the Applicant has sought to streamline the process as far as possible, and part of this work has been in aligning timings for monitoring and reporting. This has included extensive engagement with LLAOL regarding the availability of monitoring data and associated timescales for reporting, to ensure that the procedures can be accommodated prior to the summer season capacity declaration at the end of September. The GCG Explanatory Note	No

Ref	Comment	No. PILs	Response	Change
	within which the operator must declare its capacity and slot allocation. The timing of the first Annual Monitoring Report at the commencement of the GCG must also take this into account.		[TR020001/APP/7.07], submitted with the application for development consent, provides more details regarding the timings included within the Draft DCO [TR020001/APP/2.01] .	
GCG.2.47	LLAOL notes the reference in the Statutory Consultation documentation to the potential for more frequent, informal monitoring. LLAOL is unclear what is envisaged by this statement and would welcome clarification from the Applicant.	1	Regular monitoring of environmental impacts will be key to the success of GCG. Whilst it is proposed that compliance with the limits will be assessed on the basis of annual monitoring reports (as some impacts, such as noise, are seasonal) it is acknowledged that there may be value in providing more frequent informal monitoring, to allow early identification of any potential issues. This would be similar to the current airport noise monitoring approach, where an annual noise monitoring report is supported by both quarterly monitoring reports and more ad hoc community noise reports.	No
GCG.2.48	Many technical and procedural matters remain to be detailed for the GCG concept. The technical content of GCG limits and thresholds are matters which are stated to be dealt with in the ES as part of the EIA process, for which monitoring functions are already provided for as part of the statutory process. We would welcome further close engagement upon the development of the proposed GCG principle should it continue to be progressed. Currently we are sceptical that GCG as proposed would provide any additional benefits	1	The support for the GCG Framework is noted and welcomed. Further engagement was undertaken with host authorities and other key stakeholders to support the GCG Framework through the Planning Officer Coordination Groups and topic-specific technical forums.	No

Ref	Comment	No. PILs	Response	Change
	to those impacted by the construction and operation of an expanded LLA.			
Transition Period				
GCG.2.49	LLAOL fully supports the proposed transition period and proposes that the full 24 months will be required. The transition period will be necessary to ensure the airport operator has sufficient time to both put in place all the necessary component parts of the GCG following its commencement, and to provide a sufficient lead-in time to ensure its operations have been adapted as necessary in view of it.	1	Noted.	No
GCG.2.50	The transition period will not permit the operator to grow without consideration of the environmental impacts. Growth would in practice be limited during the 24-month transition period based on forecast demand and Terminal 1 infrastructure works, which would be required to expand the current capacity of the terminal. Furthermore, LLAOL would need to ensure that it managed growth with regard to the relevant Limit during the transition period, to avoid growth being restricted at the end of the transition period. The monitoring during the period will ensure that the impact is monitored and if the impact did exceed the Level 1 Threshold, the operator would be required to submit a Level 1 Plan.	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
Level 1 and Level 2 Plans and Mitigation Plans				
GCG.2.51	LLAOL acknowledges that growth must be controlled and that the interim levels before the Limits are part of the process of identifying when a Limit may be breached, to help ensure growth remains within the Limits. Level 1 and Level 2 Thresholds should be a means of monitoring and identifying these points and ensuring that a Level 1 or Level 2 Plan is put in place, given that these are required when the Limits have not been exceeded. Taking this into account, LLAOL's comments below are aimed at ensuring the right balance between protecting surrounding communities against unacceptable levels of impact, and not placing an unsustainable burden on both the operator and local authorities in respect of the administration of monitoring, reporting, and enforcement of the GCG framework. To achieve this, LLAOL believes that (a) the process should be streamlined as much as possible and be limited to what is necessary to be effective; and (b) the curtailment of growth should be limited to exceedances of Limits, rather than Level 2 thresholds.	1	Through the development of the GCG Framework, the Applicant has sought to streamline the process as much as possible to minimise the potential administrative and cost burden on both the airport operator and local authorities involved with the process. However, the Applicant believes that the Level 2 Threshold performs an important function in acting as a check when environmental impacts are close to the Limits, and the Applicant therefore believes it is appropriate that no increases in airport capacity take place at this point until a Level 2 Plan is approved, at which point growth considered in that level 2 Plan could be implemented. This principle is illustrated within the GCG Explanatory Note [TR020001/APP/7.07] .	No
GCG.2.52	LLAOL does not consider it necessary or appropriate for a Level 1 Plan to be required unless the operator has exceeded the Level 1 threshold and is planning to grow. LLAOL notes the statement on page 31 of the Consultation	1	The requirements around Level 1 Thresholds and (now superseded) Level 1 Plans have been simplified, to reduce to the administrative burden on all parties. There is no longer a specific requirement to produce a Level 1 Plan, but the	No

Ref	Comment	No. PILs	Response	Change
	<p>Document – Scenario 2, paragraph b that in the event of Level 1 being exceeded: “...a Level 1 Plan is produced by the Airport Operator to demonstrate that the next period of growth (length of this period to be agreed with ESG) can be achieved without breaching the Limit”. The length of this period should not require ESG approval. Whilst the airport operator can have regard to the ESG’s comments in respect of the period, the operator is best placed to determine the appropriate period and flexibility is required to ensure it is a reasonable period in line with the timing of the operator’s seasonal IATA capacity declarations. An approval requirement would contradict the principle that Level 1 Plans do not require ESG approval.</p>		<p>associated requirements for the content of Level 1 Plans set out in during the 2022 statutory consultation are now incorporated into the Monitoring Report, over which ESG is not proposed to have any approval rights (as was proposed for Level 1 Plans at Statutory Consultation). The need for any explicit approval by the ESG for the airport operator to implement future growth when below a Level 2 Threshold (and therefore the Limit as well) has been removed, to align with the intent for Monitoring Report and (now superseded) Level 1 Plans. These principles are illustrated within the GCG Explanatory Note [TR020001/APP/7.07].</p>	
GCG.2.53	<p>Exceedance of Level 2 thresholds should not result in a curtailment of growth. Otherwise, Level 2 will become the de facto Limit, which undermines the purpose of the GCG and would place unnecessary constraint on the operator. The operator should have the discretion to grow on the basis of a Level 2 Plan showing how the increase can be accommodated within the Limits, and growth should only be limited at the point that the Level 2 Plan cannot demonstrate that growth can be achieved within the Limits. For example, fleet transition could result in an exceedance of the Level 2 threshold for noise in one year,</p>	1	Please refer to the response to Ref GCG.2.51.	No

Ref	Comment	No. PILs	Response	Change
	however additional growth would not necessarily mean that the exceedance would continue into the following year as further fleet transition could have then happened.			
GCG.2.54	The security of the enforcement of the Limit through the limitation on growth provides ultimate comfort and underlies the approach of this framework.	1	Please refer to the response to Ref GCG.2.51.	No
GCG.2.55	The GCG framework must be designed such that the Levels or Limits are not treated as being exceeded where the exceedance is not caused by the operator, and appropriate exemptions should apply. Therefore, if monitoring were to show that the Levels or Limits were exceeded, it would be necessary to first determine the cause of the exceedance, prior to any action being required by the operator. Exemptions are also required where the cause of the exceedance is outside the control of the operator or is temporary in nature.	1	This is acknowledged. GCG has been designed so that where ESG agrees that the exceedance of a Limit or Level 2 Threshold is due to factors beyond the control of the airport operator, no Level 2 Plan or Mitigation Plan would be required.	No
GCG.2.56	LLAOL does not consider it appropriate for the ESG to have formal 'approval rights' over the Level 2 Plan or Mitigation Plan. It is more appropriate for the ESG to have a consultative role on these documents, in the same way as for the Level 1 Plans, with the operator being required to have regard to the ESG's comments. The Limits themselves act as the constraint on the operator – with the consequences for growth	1	The Applicant considers that effective scrutiny and review of the environmental effects of the Proposed Development, combined with robust governance, is fundamental in making the GCG framework effective. On that basis, the role of the ESG in approving Level 2 Plans and Mitigation Plans, where environmental impacts are close to Limits, forms an important part of the GCG approach and has been retained.	No

Ref	Comment	No. PILs	Response	Change
	applicable in the event of exceedance of the Limits.			
GCG.2.57	The purpose of the Level 1 and 2 Thresholds is to provide early warning indicators to ensure growth remains within the Limits. Accordingly, LLAOL supports the proposal that Level 1 and Level 2 Plans should only be required when the relevant Level is actually exceeded. Similarly, LLAOL supports the proposal that a Mitigation Plan should only be required where the Limit is exceeded.	1	Noted.	No
GCG.2.58	LLAOL supports the proposal that the key control within the GCG framework is the restriction on the operator increasing their declared capacity and allocating any further slots, as LLAOL considers this to be an effective consequence to ensure the operator stays within the Limits.	1	Noted.	No
GCG.2.59	LLAOL does not support the proposal for the ESG to approve, or require changes, or impose its own Level 2 or Mitigation Plans on the operator. The operator is best placed to understand and identify the best means of mitigating impact, given its access to all necessary information and expertise in the operation of the airport. The process ultimately requires the operator to have a robust Plan in order to grow. It is not appropriate for the ESG to frustrate growth and/or impose Plans, as this could lead to the operator being unable to	1	Please refer to the response to Ref GCG.2.56.	No

Ref	Comment	No. PILs	Response	Change
	comply and in turn causing a potential breach of the DCO. However, the operator should have regard to the comments of the ESG on the Plans, in the same way as it must do for Level 1 Plans.			
GCG.2.60	The process must also recognise the time it may take to bring the impact below the Level or Limit. For example, as explained above, noise contours are assessed retrospectively. Therefore, time must be allowed for the mitigations to take effect. Annual monitoring over this period will still be appropriate for the reasons set out above, rather than more frequent monitoring. The GCG framework must also recognise that Mitigation Plans must be subject to compliance with the Airport Slot Allocation Regulations.	1	This point is acknowledged. As part of Level 2 Plans or Mitigation Plans, it is expected that the airport operator would set out timescales over which impacts would be reduced. The Applicant is also proposing that an independent aviation expert would form part of the ESG to ensure that the group can draw on expertise around aviation operations, including any statutory requirements.	No
GCG.2.61	If the Mitigation Plan has not been effective within the timescales set out, LLAOL supports the proposal that a new Mitigation Plan must be submitted using the same process as above. Again, lack of growth is sufficient deterrent to ensure LLAOL addresses the Mitigation appropriately	1	Noted.	No
GCG.2.62	We suggest some involvement of the (national) Office for Environmental Protection, established through the Environment Act. As proposed, ESG reports to Luton BC, which is also the owner of Luton Rising, so potential conflict of interest in exercising control on airport operation.	1	In response to feedback from the 2022 statutory consultation, the Office for Environmental Protection was approached to determine their interest in a role on the ESG. They do not feel that a role of this nature is within their remit and have Therefore declined to be part of the process.	Yes

Ref	Comment	No. PILs	Response	Change
			<p>The Applicant does however agree that the independence of ESG is fundamental and would note that the ESG does not routinely 'report' to LBC – whilst LBC has a role on ESG (and should do, as the local authority for the majority of land in which the airport is sited, and an authority that will experience impacts from the Proposed Development) an independent chair is proposed. LBC's only other role will be in carrying out formal enforcement against the airport when the GCG process is not followed, which is a requirement in current planning law.</p>	
GCG.2.63	<p>Furthermore, we advocate for diversity and independence of the membership and decision making of the Environmental Scrutiny Group (ESG). Members should be technical experts in their field (and include stakeholders from airlines and the airport operator, the CAA and DfT). We recommend the ESG should not have approval control/rights over Level 2 Plans and Mitigation Plans.</p>	1	<p>It is agreed that the independence of the proposed ESG is vital, and to that end the Applicant is proposing that the ESG members will included an independent chair, and independent aviation expert, and planning professionals from four local authorities. This membership is considered to bring the required independence and oversight. The DfT and CAA (and other organisations suggested by other stakeholders) were approached following the 2022 statutory consultation regarding potential roles on the ESG, but declined the opportunity.</p> <p>Whilst the Applicant does not believe it is appropriate for individual airlines operating the airport to have a role on ESG, it is recognised that there is merit in a representative airline industry body having a role, based on the existing</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>legislation for the management of capacity and slots at the airport. On this basis an industry voice within ESG will be important in understanding the interaction between growth and environmental impacts.</p> <p>Whilst it is agreed that it is useful to have independent aviation expertise on the ESG, it is not considered that the members of ESG need to be technical experts in the environmental topics that are within scope of ESG, with this expertise instead being more appropriate on the Technical Panels that report to ESG. This includes an independent technical expert for each Technical Panel, in addition to local authority experts.</p> <p>It is fundamental that the ESG is able to approve Level 2 Plans and Mitigation Plans to provide independent oversight of environmental impacts, and this continues to form part of the proposals.</p>	
GCG.2.64	<p>It is also crucial that the ESG framework works efficiently and effectively, and this is key to striking the right balance between protecting surrounding communities against unacceptable levels of impact, whilst not placing an unsustainable burden on the airport operator and local authorities in respect of the monitoring, reporting, and enforcement of the GCG framework. Similarly, monitoring requirements under the GCG should make best use of the</p>	1	<p>Noted. Best use of existing monitoring arrangements has been made and reducing duplication where possible is important.</p>	No

Ref	Comment	No. PILs	Response	Change
	existing measurement frameworks already in place at the airport.			
GCG.2.65	LLAOL recognises that some form of oversight of the GCG framework is required to ensure its effectiveness. The level of oversight and the requirements of the GCG processes need to strike the right balance between protecting surrounding communities against unacceptable levels of impact, and not placing an unsustainable burden on both the airport operator and local authorities in respect of the administration of monitoring, reporting, and enforcement of the GCG framework. Neither should the ESG, through its actions, seek to effectively reverse a DCO decision to expand the airport.	1	<p>Noted. The GCG process has been designed in a way that doesn't place an unsustainable burden on either the airport operator or local authorities and makes use of existing monitoring and reporting mechanisms where possible.</p> <p>The ESG must operate within defined Terms of Reference (included as an appendix to the GCG Framework) and can only make decisions with respect to its explicit functions, as set out in the DCO and the Terms of Reference.</p>	No
GCG.2.66	The independence of the ESG (including through its membership and decision-making process) is key to ensuring the balance referred to above is right and that the GCG framework works efficiently and effectively. It is critical that the membership of the ESG has the correct balance of independent representation and specialist knowledge in view of its proposed remit. LLAOL supports the proposal for the ESG to have an independent chair and at least one other independent aviation specialist (and in this regard, LLAOL proposes there must be at least two other independent aviation specialists, in addition to the independent chair). In addition,	1	Please refer to the response to Ref GCG.2.63.	No

Ref	Comment	No. PILs	Response	Change
	LLAOL proposes that the operator, airlines, the CAA, the Department for Transport (or equivalent industry professionals) should also all have representative members on the ESG. LLAOL also supports the proposal for the representatives of the local authorities to be appropriately qualified planning professionals, working within the planning department of the relevant local authorities, as the remit of the ESG should be limited to technical decisions.			
GCG.2.67	LLAOL supports the proposal that the functions and decision-making process of the ESG should be defined by a Terms of Reference. The Terms of Reference must ensure independent, evidence-based decision-making based on expert evidence. LLAOL would welcome a discussion with the Applicant to understand the decision-making process and voting rights within the ESG panel, to ensure there is no inherent bias or vested interests, allowing independent, evidence-based decision-making to be adhered to. The Terms of Reference should not be amended, and decisions should not be taken outside of the Terms of Reference without the operator's approval.	1	Noted.	No
GCG.2.68	LLAOL notes it is expected that the ongoing reasonable costs of the ESG, including meetings, monitoring, and funding of necessary technical support to the Technical Panels, would be funded	1	Noted. Requirements around the funding of the ESG can be found within Section 2.4, and detail on the Technical Panels are found at Appendix B	No

Ref	Comment	No. PILs	Response	Change
	by the operator. LLAOL would welcome a discussion with the Applicant to further define and understand the specific costs that are expected to be funded by the operator and how the operator can be assured these will remain reasonable and proportionate.		of the GCG Framework [TR020001/APP/7.08] as part of the application for development consent.	
GCG.2.69	The functions and process of the ESG and Technical Panels must be streamlined and efficient from both a costs perspective and to ensure that the operation of the airport is not impacted. The ESG and Technical Panels will need to complete their reviews and where applicable, approvals, within defined time periods to ensure the smooth operation of the airport	1	Noted. The Terms of Reference for the ESG have been prepared within Appendix A, and Technical Panels are in Appendix B of the GCG Framework [TR020001/APP/7.08] as part of the application for development consent and include requirements around timing of reviews and approvals.	No
GCG.2.70	The membership of the Technical Panels should represent the right balance of stakeholders and expertise and should include representatives of airlines operating at Luton Airport as key stakeholders. The operator should also be a member of the Technical Panel. The operator will be able to inform and assist the Technical Panel in their reviews, as there will be factors and nuances within the airport operation that may not be apparent to the Technical Panel, which must be considered within any recommendation or decision-making process.	1	The Applicant does not agree that it would be appropriate for direct beneficiaries of growth to play a role in the management of the GCG process. Consequently, membership of the Technical Panels is set out in the GCG Explanatory Note [TR020001/APP/7.07] and excludes the current airport operator and any current airlines using the airport from membership. The role of Technical Panels is to provide advice and recommendations to the Environmental Scrutiny Group and as such membership is restricted to those with the technical knowledge and experience from local planning authorities and other regulatory bodies,	No

Ref	Comment	No. PILs	Response	Change
			plus at least one independent expert in the particular field of the Technical Panel.	
GCG.2.71	LLAOL notes that Figure 3.1 in the GCG Proposals suggests the ESG Noise Panel is the NEDG and the ESG Surface Access Panel is the ATF. LLAOL notes that these bodies were not originally established for this purpose and that the membership of the Technical Panels should be considered in the context of the proposed development, whilst ensuring that the NEDG and the ATF can continue to support the operation as they do today. The terms of reference for all the Technical Panels should be aligned with the requirements of the GCG Proposals.	1	The Applicant acknowledges the legitimate concerns of the respondent and refers back to our response to comment GCG.2.70 for membership of Technical Panels.	No

Table A4.3: Regard had to statutory consultation responses on GCG comments – Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
General				
GCG.3.1	GCG proposals are positive but could be implemented without expanding the airport and further, could be used to determine whether existing limits are met.	7	The support for the GCG Framework is noted and welcomed. A key part of the GCG Framework is that they become legally binding. The Applicant is proposing that this is done by securing GCG requirements through specific 'provisions' in the application for development consent. These provisions can legally require certain activities to be undertaken at certain times, and failure to do so would be a legally enforceable breach. A DCO can only be sought for an airport expansion where the expansion results in additional passenger throughput of 10 mppa or more, and as such this GCG approach could not be used without expanding the airport in the way proposed.	No
GCG.3.2	Respondents state that they are happy with the Green Controlled Growth proposals.	72	Noted.	No

Ref	Comment	No. CC	Response	Change
Impact				
GCG.3.3	Suggest that GCG should benefit the needs of those impacted by the Proposed Development rather than considering the interest of airlines.	1	The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport. As such, the GCG Framework ensure that growth can take place at the airport, but not at any cost. Through GCG, the benefits of the sustainability and mitigation measures being introduced, and wider changes in aviation technology, can be shared between the airport (in the form of increased growth) and local communities (in the form of reduced impacts).	No
GCG.3.4	Concern that GCG proposals are inadequate and/or will not make a difference to key environmental issues including noise impacts and climate change.	246	Please refer to the response to Ref GCG.2.9.	No
Assessment				
GCG.3.5	The GCG framework is too strict and will hinder the ongoing operation and growth of the Airport.	1	Please refer to the response to Ref GCG.2.11.	No
GCG.3.6	Concern that GCG limits will not be effective and amount to greenwashing as it cannot control or mitigate carbon	346	Please refer to the response to Ref GCG.2.12.	No

Ref	Comment	No. CC	Response	Change
	emissions associated with aircraft use, the impact of which will increase with future expansion and more flights.			
GCG.3.7	Targets/limits are too high and should be more ambitious. Specific comments include that the limits should: be reflective of current limits, set by independent bodies, reflect the urgency of climate change, and be flexible to enable alignment with future changes in environmental guidance and legislation.	28	The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport. As such, the Applicant has developed GCG Framework to ensure that growth can take place at the airport, but not at any cost. The Limits that are proposed to set through the GCG approach are informed by the comprehensive forecasting of the impacts of the Proposed Development undertaken to inform the EIA. As such, they take into account the current environmental performance of the airport, and the extensive measures the Applicant is taking to both reduce and mitigate the impacts of the Proposed Development, as detailed in the ES [TR020001/APP/5.01] . Because the Limits have been set in this way, reflecting the specific proposals and the measures being brought forward to address environmental impacts, the Applicant believes it is appropriate to	No

Ref	Comment	No. CC	Response	Change
			<p>put forward Limits that reflect this work, rather than an arbitrary Limit being imposed from a third party.</p> <p>Crucially, the EIA will be tested through the examination process to ensure that the proposals, including the forecasted impacts, are compliant with current policy, legislation and environmental guidance, including on climate change.</p>	
GCG.3.8	Suggest that GCG includes limits on air traffic movements.	1	<p>One of the fundamental principles of the GCG approach is that ongoing growth at the airport is linked to the actual impact of the Proposed Development. As such, the GCG Framework allow for ongoing monitoring of impacts in four key environmental areas; aircraft noise, air quality, GHG emissions and surface access.</p> <p>Through this approach of directly linking growth at the airport to measured environmental impact, the GCG approach can be used to incentivise better environmental performance at the airport. For example, by placing a limit on aircraft noise rather than the number of aircraft movements, airlines would be able to operate a greater</p>	No

Ref	Comment	No. CC	Response	Change
			<p>number of flights within the limit through transitioning their fleet to newer, quieter aircraft, with the same or better overall level of noise impact than if they used older, noisier aircraft. This ensures that the benefits of new technology are shared between the airport (through allowing for growth) and the local community (through the use of quieter aircraft and lower levels of noise impact).</p> <p>It should also be noted that the GCG approach will not change or remove the proposed passenger cap of 32 mppa.</p>	
GCG.3.9	GCG limits should be aligned with individual airline Net Zero targets.	1	<p>As the GCG Framework were developed, the Applicant carefully considered the inclusion of Scope 3 aviation emissions in the context of the UK Emissions Trading Scheme (UK ETS), introduced in January 2021. The UK ETS proposes a sector-wide 'cap and trade' approach to the management of GHG emissions. Aviation is incorporated within the UK ETS, and the Government has consulted on setting an appropriate trajectory for UK ETS that allows the UK to reach net zero by 2050.</p>	No

Ref	Comment	No. CC	Response	Change
			<p>Given that this sector-wide approach exists, and that compliance with it is already a legal requirement for airlines, the Applicant does not believe that provision of controls on carbon emissions associated with aircraft use through the GCG Framework would be appropriate, as the Government has confirmed that it believes aviation emissions are best dealt with at a national level.</p> <p>For this reason, whilst individual airline Net Zero targets are noted and welcomed, the Applicant continues to believe that aviation emissions are addressed through the UK ETS.</p>	
Monitoring				
GCG.3.10	Suggest that there should be an improved and/or more accurate method of measuring GCG thresholds and/or there should be a clear enforcement process.	2	Monitoring Plans for each of the four GCG environmental topics are included as appendices to the GCG Framework [TR020001/APP/7.08] submitted as part of the application for development consent, setting out how the impacts will be monitored with respect to the proposed Limits/Thresholds.	No

Ref	Comment	No. CC	Response	Change
			<p>A key part of the GCG Framework is that they become legally binding. It is proposed that this is achieved through securing GCG requirements through specific 'provisions' in the DCO. These provisions can legally require certain activities to be undertaken at certain times, and failure to do so would be a legally enforceable breach of the Order. This approach is explained in detail in the GCG Explanatory Note [TR020001/APP/7.07].</p>	
GCG.3.11	<p>Suggest that GCG limits are enforced as soon as the Proposed Development is approved.</p>	1	<p>Please refer to the response to the Ref GCG.1.22.</p> <p>The GCG Framework would be triggered once the airport operator gives notice that it wishes to operate above the passenger cap, within its existing planning permission with the provisions of the DCO relating to Level 2 Thresholds and the Limits having effect 24 months after notice is given. This is explained further within the GCG Framework [TR020001/APP/7.08].</p>	No
GCG.3.12	<p>Concern that there is a lack of detail regarding how GCG limits will be complied with and/or how the limits will be enforced.</p>	238	<p>The proposed Limits for GCG have been set by the Applicant, not LBC, and the approach to setting those Limits has been developed through engagement</p>	No

Ref	Comment	No. CC	Response	Change
			<p>with a range of stakeholders, of which LBC is just one.</p> <p>It is for the Planning Inspectorate and Secretary of State for Transport, who are both independent of the Applicant and LBC, to determine whether the proposed Limits are appropriate in the context of the Proposed Development.</p>	

A5: CLIMATE CHANGE

Table A5.1: Regard had to statutory consultation responses on Climate Change comments – Planning Act 2008: Section 42 – Prescribed consultees

Ref	Comment	PC	LA	No PILs	Response	Change
General						
CC.1.1	LR make a distinction between Net Zero and Carbon Neutral. This distinction is not supported by definitions given by relevant established bodies (including the Carbon Trust and the IPCC). The terms are typically used synonymously in public discourse too. NHC asks LR to: Use either 'net zero' or 'carbon neutral' consistently.		North Hertfordshire District Council	1	There are a range of definitions from different organisations for 'carbon neutral' and 'net zero'. Within the application for development consent, the distinction the Applicant uses between carbon neutral and net zero arises from how residual emissions are addressed in line with the definitions adopted in the Applicant's overarching corporate Net Zero Strategy (Ref 7) (which is separate from this application for development consent).	No
CC.1.2	Elsewhere in the DGCG, 'carbon neutrality' applies only to surface access and 'net zero' to ground operations.		North Hertfordshire District Council	1	The Intergovernmental Panel on Climate Change (IPCC) (Ref 8) considers carbon neutral and net zero as two terms referring to the same activity: the balancing globally of anthropogenic CO2 emissions by anthropogenic CO2 removals over a specified period. However, the British Standards Institution (BSI) (Ref 9) suggests carbon neutral is achieved when there is no net increase in CO2	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>emissions but does not specify how this balance is to be achieved.</p> <p>The Applicant's definitions are:</p> <ul style="list-style-type: none"> • carbon neutral is achieved when all residual CO2 emissions are balanced by carbon reduction offsets (in line with the BSI). • net zero is achieved when all residual CO2 emissions are balanced by carbon removal offsets (in line with IPCC). 	
CC.1.3	We are acutely aware of the particular challenge that the aviation sector and its workers have faced during the pandemic. But as the sector starts to rebuild, it must embrace decarbonisation to ensure a green recovery.	Transport for London			Noted. The Applicant remains committed to supporting the industry to decarbonise. The Sustainability Statement [TR020001/APP/7.06] submitted as part of this application for development consent, sets out the steps taken both to embed measures to reduce GHG emissions, as well as to future-proof proposals to help support the implementation of new technology.	No
CC.1.4	The airport has its Sustainability and Net Zero strategies in place and the airport operator has made a commitment to reducing the carbon footprint through		Central Bedfordshire Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	construction and operation including becoming carbon neutral for ground operations by 2030 and a net zero airport by 2040. These ambitions are supported and welcomed.					
CC.1.5	We welcome the Airport's lead in the transition to carbon net zero and the commitment it has stated to delivering the Government's ambition of net zero aviation through a number of measures including promoting the supply of sustainable aviation fuels and the support for electric aircraft		Central Bedfordshire Council	1	Noted.	No
CC.1.6	The Aviation Environment Forum (AEF) has made summary recommendations in relation to environmental policy challenges in relation to the Aviation Strategy.		North Hertfordshire District Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
Climate emergency and meeting net zero policy						
CC.1.7	Global warming is a critical issue facing the world; emissions must be decreased, not increased by more flights.	Kings Walden Parish Council		1	The Applicant has carefully considered climate change and related matters, including greenhouse gas (GHG) emissions, in bringing forward the Proposed Development.	No
CC.1.8	We are facing a climate emergency. National legislation has set a target of net zero emissions by 2050 and the scientific evidence is clear that we must halve our emissions by 2030 to keep us on track and limit global temperature rise to 1.5°C. This is why the Mayor has declared that London must achieve net zero emissions by 2030. The aviation sector needs to play its part and not undermine our collective efforts to rapidly decarbonise.	Transport for London			<p>Targets have been set for the aspects of the Proposed Development over which the Applicant has some control, including a goal of net zero emission airport operations and carbon neutral surface access by 2040 and carbon neutral surface access emissions by 2040.</p> <p>Government policy supports the continued growth of aviation to 2050, as recently published in its aviation strategy, Jet Zero (Ref 10). Government has stated it will follow the High Ambition Scenario presented in this policy document, whilst explaining in the Sixth Carbon Budget (Ref 11) how this is consistent with reaching net zero by 2050. The application for development consent is consistent with the approach to aviation carbon in the Jet Zero Strategy.</p>	No
CC.1.9	Expansion threatens to undermine our efforts to decarbonise and we cannot support Luton Airport's unambitious proposals without your being able to	Transport for London			<p>Targets have been set for the aspects of the Proposed Development over which the Applicant has some control, including a goal of net zero emission airport operations and carbon neutral surface access by 2040 and carbon neutral surface access emissions by 2040.</p> <p>Government policy supports the continued growth of aviation to 2050, as recently published in its aviation strategy, Jet Zero (Ref 10). Government has stated it will follow the High Ambition Scenario presented in this policy document, whilst explaining in the Sixth Carbon Budget (Ref 11) how this is consistent with reaching net zero by 2050. The application for development consent is consistent with the approach to aviation carbon in the Jet Zero Strategy.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	demonstrate how they are compatible with our net zero carbon and wider environmental ambitions.				The Proposed Development includes additional mitigation measures where possible. These include measures to facilitate the use of Sustainable Aviation Fuels (SAF) and to encourage the use of the most efficient and low-emission aircraft.	
CC.1.10	Rapidly expanding aviation is the fastest growing source of green house gas (GHG) emissions. The proposed expansion envisages 103,000 additional flights a year, a 60% increase on current levels, which will produce an enormous increase in emissions. There is a climate emergency and this application ignores that reality.		Dacorum Borough Council	1	<p>Outside of the commitments made as part of the Proposed Development, the Applicant retains a keen interest in progressing sustainability within the aviation sector and will continue to engage with, and work with, others on measures which advance the journey to zero carbon aviation.</p> <p>With regard to ground operations and emissions within the Applicant's control, a number of measures have been incorporated into the design of the Proposed Development to support achieving the net zero ambitions. These measures include facilities for greater public transport usage (such as extending the Luton DART to the proposed Terminal 2), improved thermal efficiency, electric vehicle charging, on-site energy generation and storage, new aircraft fuel pipeline</p>	No
CC.1.11	This growth will inevitably produce very significant increases in GHG which DBC considers to be neither "sustainable growth" nor "sustainable development". The proposed expansion which would produce an estimated 1.3m tonnes of carbon emissions each year seems flawed and is incompatible with the urgent		Dacorum Borough Council	1	<p>With regard to ground operations and emissions within the Applicant's control, a number of measures have been incorporated into the design of the Proposed Development to support achieving the net zero ambitions. These measures include facilities for greater public transport usage (such as extending the Luton DART to the proposed Terminal 2), improved thermal efficiency, electric vehicle charging, on-site energy generation and storage, new aircraft fuel pipeline</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	action required to respond to the climate emergency.				connection and storage facilities (reducing the need for fuel to be delivered by road) and sustainable surface and foul water management installations.	
CC.1.12	In the absence of a proven mitigation at a suitable level of technology readiness, Buckinghamshire Council is of the view that the proposed development will lead to a significant increase in cumulative emissions which appears irreconcilable with the UK's stated ambition of achieving Net Zero emissions by 2050. Further, it remains to be seen as to what level of residual demand for air travel will survive the Covid-19 pandemic.		Buckinghamshire County Council	1	The Applicant has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but only if strict environmental Limits are observed. The GCG proposals mean that growth at the airport will only be delivered where limits on GHG emissions, amongst other impacts such as on aircraft noise, air quality, and surface access, are adhered to. GCG will be a legally binding framework, and compliance will be overseen by an independent body. Further information can be found in the GCG Explanatory Note [TR020001/APP/7.07] and GCG Framework [TR020001/APP/7.08] submitted as part of this application for development consent.	No
CC.1.13	Any increase in passenger numbers is in conflict with the Government's commitment to reach net Zero by 2050.	Kings Walden Parish Council		1		No

Ref	Comment	PC	LA	No PILs	Response	Change
CC.1.14	The Environment: airport expansion does not make any sense when the world is facing a climate crisis and Government has committed to Net Zero by 2050.	Kings Walden Parish Council		1	The GHG emissions assessment has been undertaken in line with current best practice for assessing the significance of GHG emissions published by the Institute of Environmental Management and Assessment (IEMA) and taking into consideration the Government's policy on decarbonisation of the aviation sector.	No
CC.1.15	<p>PEIR2 12.2.16 mentions the Climate Change Act's (amended) target of Net Zero by 2050. However, the government has also set milestones for decarbonisation, relative to 1990 levels:</p> <ul style="list-style-type: none"> • 68% by 2030 (UK's Nationally Determined Contribution) • 78% by 2035 (statutory) <p>In 2019, emissions were 43.8% down.¹ That means that, to meet the 2030 target, emissions must fall a further 24.2 percentage points, or 43% relative to 2019 levels (from 56.2% to 32%). NHC asks LR to: Demonstrate how airport</p>		North Hertfordshire District Council	1	<p>The assessment of GHG emissions concluded that the Proposed Development will not affect the ability of the UK to meet its net zero target by 2050.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	expansion will be consistent with the statutory decarbonisation milestones.					
CC.1.16	The Committee on Climate Change (CCC) has been clear in its Sixth Carbon Budget report that “there should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory to be able to accommodate the additional demand.” Despite there being no evidence of this to date, the Government’s consultation on ‘Jet Zero’ held during summer 2021 failed to adequately address how UK aviation would support achievement of net zero carbon and explicitly avoided answering whether and how capacity growth could be accommodated. I agree with the CCC’s 2021 progress report to Parliament which clearly stated that “some	Transport for London				No

Ref	Comment	PC	LA	No PILs	Response	Change
	moderation of demand growth is likely to be required to meet the legislated emissions targets, as pre pandemic trends in demand growth exceed what we expect can be accommodated in a Net Zero world". In this context, we cannot see how any airport expansion can be justified and we therefore oppose Luton Airport's proposals, as we consider them to be incompatible with the UK's net zero target.					
CC.1.17	The National Planning Policy Framework (NPPF) 2019 refers to the DfT General Aviation Strategy 2015. That Strategy paper does not mention either climate change or carbon reduction targets. The Government publications "Beyond the Horizon" (2016) and consultation on "Aviation 2050" (2018) recognised these failings and		Dacorum Borough Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	acknowledged the need to negotiate long term international goals on emissions with the International Civil Aviation Organisation (ICAO).					
CC.1.18	The Council has declared a climate change emergency and is currently working on its own Climate Change Strategy, Action Plan and Charter. The Council would encourage Luton Rising to consider and sign up to the Charter once adopted to show commitment to the Council's vision and to demonstrate collaborative working.		Stevenage Borough Council	1	The Applicant is already a keen supporter and enabler for Luton's climate change objectives. It looks forward to learning more about the Stevenage Climate Change Charter and considering this matter when it has been adopted.	No
CC.1.19	We would like to raise the issue of "local" carbon budgets and ask that impact of the airport expansion on the local budgets of Local Authorities is assessed. At this stage it is unclear how the expansion will impact CBC's ability to achieve its Sustainability Plan's goal of		Central Bedfordshire Council	1	The significance of GHG emissions impact is provided in Chapter 12 Greenhouse Gases of the ES [TR020001/APP/5.01] and has been assessed with reference to updated guidance from the IEMA published in February 2022 (Ref 12). A key consideration is the extent to which the projected emissions from a	No

Ref	Comment	PC	LA	No PILs	Response	Change
	achieving carbon neutrality by 2030.				proposed development are consistent with a suitable trajectory to net zero.	
CC.1.20	The ES should assess the development's impact on individual authority's ability to meet their local carbon budgets. The method to determine significance is described as using two tests: the first is a qualitative approach against the Appraisal of Sustainability, and the second compares the future emissions to the UK carbon budgets. Local Authorities are urged to apply local carbon budgets and therefore the assessment in addition to the UK carbon budgets, should use the local carbon budgets for each local authority affected by the development		Central Bedfordshire Council	1	Trajectories that may be considered include the UK's legally-binding national carbon budgets, sector specific trajectories such as those proposed by the Committee for Climate Change in their 6th Carbon Budget report (Ref 13), and local authority budgets developed for the UK Government by the Tyndall Centre for Climate Change Research (Ref 14). While a local carbon budget may appear to be a suitable comparator to assess future significance, discussions with the researchers at the Tyndall Centre suggest that they are of limited use when considering the GHG emissions impact of Nationally Significant Infrastructure Projects that have a much broader geographical influence. Therefore, the Proposed Development has not been assessed against local carbon budgets.	No
CC.1.21	This Council declared a Climate Emergency in July 2019 and is very mindful of the potential impact on the Borough of future proposed		Dacorum Borough Council	1	Within the GHG emissions assessment, the significance of aviation emissions has been evaluated by a quantitative comparison to the Jet Zero Strategy High Ambition scenario	

Ref	Comment	PC	LA	No PILs	Response	Change
	changes to the operation and capacity of London Luton Airport (LLA). It remains committed to protecting its residents and its environment from the adverse effects of LLA.				<p>(Ref 15), as this represents current UK Government policy on aviation. All other emissions, from airport operations, surface access and construction, have been quantitatively assessed relative to the UK's national carbon budgets until 2037 (the last date for which budgets have been ratified into law); thereafter a qualitative assessment of significance has been carried out. For all emissions sources, the evaluation of significance has also been informed by the extent to which the Proposed Development is consistent with existing and emerging policy and best practice.</p> <p>Further information on the GHG assessment is provided in Chapter 12 Greenhouse Gases of the ES [TR020001/APP/5.01] submitted as part of the application for development consent.</p>	
CC.1.22	If aviation is to be treated as an exception and permitted to contribute a smaller reduction in GHG emissions than required for the country as a whole, then the government (as the		North Hertfordshire District Council	1	It is outside the scope of this application for development consent to consider decarbonisation in other sectors.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>coordinator of sector decarbonisation plans) will need to identify which other sector(s) will decarbonise faster in order to offset the shortfall in aviation. There can of course be no double-counting of sectors.</p>					
GHG Assessment						
<p>CC.1.23</p>	<p>[PIER ch 5] The Planning Inspectorate's Scoping Opinion (Section 4.4) stated that ... Table 5.1 of the PEIR states that 'Cumulative' GHG effects are scoped out and it would be helpful if LLAL could clarify if this is in accordance with the scoping opinion.</p>	<p>Civil Aviation Authority</p>			<p>The Scoping Opinion states "<i>The Applicant intends to scope out a specific cumulative assessment for GHG emissions on the basis that the nature and assessment of GHG emissions is already inherently cumulative. The Inspectorate does not agree this approach in the absence of sufficient justification and considers that the Applicant should identify and consider the cumulative effects of the Proposed Development with other relevant projects or plans.</i>" However, the GHG emissions assessment by its nature is a cumulative assessment and considers whether the Proposed Development would contribute significantly to emissions on a national level. Additionally, the latest guidance</p>	<p>No</p>

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>published by the IEMA on assessing greenhouse gas emissions and evaluating their significance (Ref 16), states that effects of GHG emissions from specific cumulative projects in general should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other.</p> <p>A copy of the Scoping Opinion and Scoping Report [TR020001/APP/5.05] is submitted with the application.</p>	
CC.1.24	<p>The material presented to the Council in November 2021 included an environmental assessment that quantifies the cumulative GHG emissions as 0.78% of the 6th Carbon Budget as proposed by the Climate Change Committee. It also notes that all GHG emissions have a cumulative effect upon the environment, but that there is no quantified threshold for</p>		Buckinghamshire County Council	1	Please refer to the response to Refs CC.1.19 and CC.1.23.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	determining GHG significance of emissions.					
CC.1.25	In the calculations for GHG emissions some of the aviation related emissions are omitted. It appears that the only air traffic movements that are included are the emissions as a result of fuel consumption during take-off and landing cycles including descent and ascent up to 3000ft. as well as emissions from aircraft fuel consumption during the climb, cruise, descent phase of flight (i.e. above 3000ft, includes aircraft departing from the airport only to avoid double counting of emissions with other airports). It is understood that inclusion of emissions from all flights full durations could lead to double counting, but the airport needs to acknowledge the wider picture that increased flights on the scale proposed		Central Bedfordshire Council	1	<p>Please refer to the response to Refs. CC.1.19 and CC.1.23.</p> <p>Chapter 12 Greenhouse Gases of the ES [TR020001/APP/5.01] submitted as part of the application for development consent, takes account of GHG emissions arising over the lifecycle of the Proposed Development, including construction and operation.</p> <p>This covers a range of emissions including embodied carbon in construction materials, fuel used during construction, emissions from fuel used during the transportation of passengers, staff and freight to the airport, emissions from departing aircraft (expanded below) and emissions from fuel used to heat and power buildings owned and operated by the airport.</p> <p>The advice of the Committee on Climate Change (Ref 17) with regard to aviation and the UK carbon budgets is to consider emissions from departing flights only. This advice on the inclusion of departing flights only has</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	will lead to increased carbon emissions beyond the calculations in the PEIR and that sustainability of this in relation to climate change on the global scale is a key issue that cannot be glossed over. As a result of this the Green House Gas emissions are significantly under reported in the PEIR and this issue should be addressed in the ES.				<p>been adopted by the DfT and has informed its policy on aviation and climate change. It is also used as the basis for the approach taken in the Airport National Policy Statement (Ref 18) for assessing GHG emissions from aviation.</p> <p>Modelling of GHG emissions has taken into account forecast increases in passenger numbers. This has been reflected in all aspects of the GHG emissions impacts presented from aircraft emissions thorough to surface access journeys and airport operations.</p>	
CC.1.26	[Concerning PEIRS ch 12 GHG p.12.3.17] LLAL might consider whether the impact from decommissioning should be classified (significant/not significant) as part of the decision before it is scoped out.	Civil Aviation Authority			<p>Decommissioning of the Proposed Development was removed from the scope of the ES in accordance with written advice received from the Planning Inspectorate. Further details can be found in the Scoping Opinion and Scoping Response [TR020001/APP/5.05].</p> <p>The Planning Inspectorate advised that the ES should include details of any infrastructure elements predicted to be decommissioned over a shorter time period and give consideration to the potential for likely significant effects to</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					arise in relation to these elements. It is not anticipated that any elements of the Proposed Development would be decommissioned sooner, therefore this has been scoped out of the assessment.	
CC.1.27	[Concerning PEIRS ch 12 GHG] In Table 12.32, where the Planning Inspectorate considered 'DS DCO-embedded emissions in comparison with national carbon budgets', LLAL might consider including 2050 emissions in order to show the % in the UK emissions in the ability of the UK achieving net zero.	Civil Aviation Authority			The approach for contextualising GHG emissions has changed since the PEIR in light of the UK Government's publication of the Jet Zero Strategy (Ref 4). GHG emissions from the Proposed Development have now therefore been contextualised against stated UK Government commitments to decarbonisation in the aviation sector in line with the UK's 2050 net zero target outlined within Jet Zero (Ref 4).	No
CC.1.28	Forecast GHG emissions stated in the PEIR should be reviewed in preparation for the subsequent ES. Specifically, and relative to the interest of National Highways, the following points extracted from the PEIR could be considered should further detail be available:	National Highways		1	The GHG assessment presented in Chapter 12 Greenhouse Gases of the ES [TR020001/APP/5.01] is based on the most up to date information, together with the overall emissions reductions likely to be achieved through the implementation of proposed GHG emissions mitigation measures, as far as the available data allows. There are cases where the impact of future mitigation measures	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<ul style="list-style-type: none"> • More developed data on the design of infrastructure (e.g., amendments to the SRN), and a more informed estimate of the material requirements and waste arisings from the amendments to the SRN; • Detailed information from the strategic transport modelling to inform the assessments of GHG emissions; and • Confirmation of the mitigation measures to be implemented and their effect of reducing the emissions arising from the amendments to the SRN associated with the Proposed Development. 				<p>cannot be reliably quantified and, in these cases, a qualitative description is provided.</p> <p>All known committed highway developments and transport infrastructure schemes have been incorporated into the Proposed Development strategic models, in accordance with WebTAG guidance and best practice. Further information on these schemes (as well as mitigation measures implemented to reduce emissions) is included in the Transport Assessment [TR020001/APP/7.02], submitted as part of the application for development consent.</p> <p>Chapter 19 Waste and Resources of the ES [TR020001/APP/5.01] contains a quantified assessment of the total material requirements and waste arisings from the Proposed Development as a whole, including works to the SRN. Please also refer to the Outline Site Waste Management Plan in Appendix 19.1 of the ES [TR020001/APP/5.02].</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					Surface access movements have been included in the GHG emission assessments, as per Chapter 12 Greenhouse Gases and Chapter 18 Traffic and Transportation of the ES [TR020001/APP/5.01] submitted with the application for development consent.	
CC.1.29	NHC asks LR to: Be consistent and clear about what generators of emissions are included in any statements relating to achieving net-zero.		North Hertfordshire District Council	1	Please refer to response to Ref. CC.1.25.	No
Mitigation						
CC.1.30	The range of [GHG] design and mitigation measures included in the construction and operation of the proposals are wide ranging and supported.		Central Bedfordshire Council	1	Noted.	No
CC.1.31	The Council is pleased to see that LLA has given consideration to design, building materials and reducing GHG emissions during construction and once the new buildings are in operation.		Stevenage Borough Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CC.1.32	The Draft Greenhouse Gas Management Plan sets out details of sources and impacts of a range of carbon reduction targets and impacts expected as a result of the proposed development. It notes that assessments are ongoing and measures will be refined throughout the assessment process with final measures being reported in the GHG Management Plan to be submitted as part of the ES. Stevenage Borough Council looks forward to reviewing those final measures.		Stevenage Borough Council	1	Noted. The Outline Greenhouse Gas Action Plan is submitted as part of the application for development consent in Appendix 12.2 of the ES [TR020001/APP/5.02] it is secured through a Requirement in Part 4 of Schedule 2 to the Draft DCO [TR020001/APP/2.01] .	No
CC.1.33	Although LR have outlined a plan to achieve net zero, they have not provided evidence that the measures will be sufficient to achieve net zero for surface access or ground operations. NHC asks LR to: Set out how, and by how much, each action in the decarbonisation plan will contribute to achieving net-		North Hertfordshire District Council	1	Please see the response to ref CC.1.7. Projected future emissions from ground operations and from surface access by passengers and staff will be influenced by a series of internal and external factors, including GHG emissions mitigation measures embedded within the design of the Proposed Development. It would require a disproportionate amount of time and effort to disaggregate the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	zero for surface access and ground operations.				<p>relative contributions of each individual mitigation measure to the overall GHG emissions impact from these emissions sources over the entire design life.</p> <p>A comparison between the future baseline and the core planning case (generally the equivalent future with the Proposed Development as per this application for development consent) outlined in Chapter 12 Greenhouse Gases of the ES [TR020001/APP/5.01], submitted with the application for development consent, demonstrates the impact of the Proposed Development, taking account of embedded mitigation measures.</p>	
CC.1.34	Concerning PEIRS ch 12 GHG p.12.6.5] It would be helpful if LLAL could clarify what steps, if any, it is taking to mitigate the emissions which are outside of its control (given that they account for over 90% of the overall GHG emissions of the proposed development as per Draft GHG Management Plan in	Civil Aviation Authority			Please refer to the response to CC.1.7.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Appendix 12.1 in Volume 3 of the PEIR).					
Climate change resilience						
CC.1. 35	The Council are content with the findings of the [climate change resilience chapter of the] PEIR, subject to monitoring processes identified as part of the Green Controlled Growth approach and the measures that will be put in place should limitations be breached.		Central Bedfordshire Council	1	<p>Noted. Climate change resilience is not considered as part of the GCG approach, however details on monitoring during the construction and operational periods are outlined in Chapter 9 Climate Change Resilience of the ES [TR020001/APP/5.01] submitted as part of this application for development consent.</p> <p>GCG does consider GHG emissions. The GCG proposals would ensure that growth only takes place within strict environmental limits. The airport operator would be required to periodically monitor and report on the extent of impacts associated with the airport in the four limit areas, including GHG emissions.</p> <p>If monitoring were to suggest at any point that these limits were in danger of being breached, then plans must set out how that breach would be avoided. If environmental limits were ultimately</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					breached, further growth would be stopped, and mitigation required. Further information can be found in the GCG Explanatory Note [TR020001/APP/7.07] submitted as part of this application for development consent.	
CC.1.36	[Concerning PIERS Ch 9 Climate Change & Resilience] LLAL should consider taking into account the IPCC 6th report.	Civil Aviation Authority			Whilst the Intergovernmental Panel on Climate Change (IPCC) 6th Assessment Report (Ref 19) covers potential global changes as a result of climate change, national and local data and information sources such as the UK Climate Change Risk Assessment (Ref 20), climate change projections from UK Climate Projections 2018 (UKCP18) (Ref 21), historic Met Office data and the 2021 LLAOL Climate Change Adaptation Report (Ref 22) have been deemed more appropriate to inform the assessment contained within Chapter 9 Climate Change Resilience of the ES [TR020001/APP/5.01] submitted as part of this application for development consent, since the scope of the assessment only considers the impact	No

Ref	Comment	PC	LA	No PILs	Response	Change
					of climate change on the Proposed Development itself.	
CC.1.37	Highway network improvements could be impacted due to increased frequency and intensity of heavy precipitation resulting in damage to roads and car parks because of flooding, causing disruption to users. The PEIR states that contractors would be required to use construction materials with superior properties that offer increased tolerance to fluctuating temperatures, heavy precipitation and other extreme weather events such as storms, e.g. road surfaces. Drainage and pollution control assets should be put in place to prevent extreme precipitation events that could lead to flooding and could exacerbate acute and chronic impacts on foul, non-potable and surface water	National Highways		1	The Drainage Design Statement in Appendix 20.4 of the ES [TR020001/APP/5.02] , submitted as part of the application for development consent, details how the Proposed Development can accommodate for surface water flows during 1 in 100 years storm event, accounting for an increase in precipitation of 40% due to climate change. All surface access assets will either be designed for the climatic conditions projected for the end of their design life, using appropriate design guidance where available or adaptive capacity will be built into the designs. All surface access assets will be designed in line with the relevant Design Manual for Roads and Bridges (DMRB) guidance.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	infrastructure as a result of increased frequency and intensity of heavy precipitation.					

Table A5.2: Regard had to statutory consultation responses on Climate Change comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
Climate emergency and meeting net zero policy				
CC.2.1	General concern that the Proposed Development, throughout its construction and operation, will increase the volume of emissions produced by the airport. Respondents are concerned that; the negative impacts caused by increased air and surface traffic is unjustified; it is an inappropriate time to increase emissions given the climate crisis; low cost flights will increase emissions; no mitigation will be sufficient; emissions will worsen if long haul flights or larger planes are introduced, and if planes are waiting on the second taxiway, and; relocating the tip will increase car journeys that have to be made by locals, which will increase emissions.	34	Please refer to response to Ref CC.1.7. The Tidy Tip (formally called the Eaton Green Civic Amenity Site) is not being relocated, only the access point is being moved, to a more convenient location. Vehicle emissions as a result of the tip access being relocated will be negligible. The Applicant has made a commitment to reducing carbon emissions where possible, which is central to decisions on construction materials and activities.	No
CC.2.2	Concern that the Proposed Development, at the construction and operational phase, will contribute towards climate change, cause damage to the environment and move society closer to a climate emergency by exacerbating global warming. Respondents are concerned that; the Applicant is acting irresponsibly or immorally by proposing aviation growth, or is in denial about climate change; the materials used will worsen climate change; the Proposed Development undermines other efforts to slow climate change and; the airport will never be carbon neutral.	42	The Applicant is working with supply chain partners to drive out carbon emissions, through: <ul style="list-style-type: none"> • Prioritising materials reuse; • Using low-carbon forms of concrete where possible; and • Using electrically powered vehicles and equipment wherever practicable. Regarding the Applicant being overly reliant on greener aviation technology, the GHG assessment makes a number of assumptions about external factors	No
CC.2.3	Concern that air travel is unsustainable and that aviation growth is irresponsible in light of the climate crisis and the sector's lack of social, economic and environmental	17		No

Ref	Comment	No. PILs	Response	Change
	<p>integrity. Respondents are concerned that; aviation and its associated infrastructure is environmentally damaging; mass tourism is unsustainable; the Applicant is overly relying on greener aviation technology appearing in the future and; there is too much reliance on fossil fuels which are environmentally damaging.</p>		<p>that will have a direct bearing on the overall GHG impact of the Proposed Development.</p> <p>These include the assumption that the UK electricity grid will decarbonise in line with official projections, that surface access will decarbonise in line with the Transport Decarbonisation Plan (Ref 23), and that aviation will decarbonise in line with the measures (e.g. uptake of SAFs and the rollout of Zero Emission Aircraft) applied to the High Ambition Scenario in the Jet Zero Strategy. Should any of these external factors, over which the Applicant has no control, not be implemented over the timescales assumed, there are a range of control mechanisms to limit overall GHG emissions.</p> <p>For aviation emissions, which account for a majority of the GHG impact of the Proposed Development, market-based mechanisms such as the UK Emissions Trading Scheme (UK ETS) and the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) will act to control and limit emissions in line with the UK’s net zero trajectory. For emissions from airport</p>	

Ref	Comment	No. PILs	Response	Change
			operations and surface access, the GCG Framework developed as part of the application for development consent sets limits that must be adhered to as the airport grows. Given that each of the assumptions relates to an external mitigation measure that reflects UK Government policy on energy generation, transport and aviation, it is reasonable to apply them to the GHG assessment.	
CC.2.4	Support towards the commitment to achieving net zero carbon emissions that the Applicant demonstrates.	1	Targets have been set for the aspects of the Proposed Development over which the Applicant has some control, including a goal of net zero emission airport operations and carbon neutral surface access by 2040.	No
CC.2.5	Concern that the majority of the airport's associated carbon emissions are out of their control.	1	Please refer to response to Ref CC.1.7.	No
CC.2.6	Concern that the Proposed Development will prevent or slow the Applicant, as well as society more broadly, in meeting climate change reduction targets set at a national and international scale. Respondents are concerned that the following agreements, targets and legislation will not be met; UK Carbon Budget, Net-Zero goals, carbon neutral policies, green policies, COP26 agreements, Climate Change Committee advice, LBC obligations, and	34	Please refer to response to Ref CC.1.7.	No

Ref	Comment	No. PILs	Response	Change
	declarations of government and Local Authority Climate Emergencies.			
CC.2.7	Concern that the Applicant will not be able to meet emissions targets as they only have limited control over its carbon emissions, the majority of which comes from planes operated by airlines. Respondents are concerned that previous promises that aircraft are getting greener have not been delivered.	1	Please refer to response to Ref CC.1.7.	No
Environmental Impact				
CC.2.8	Concern that the Proposed Development, at the construction and operational phase, will contribute towards climate change, cause damage to the environment and move society closer to a climate emergency by exacerbating global warming. Respondents are concerned that; the proposed rate of growth is not sustainable, the carbon footprint of the airport will be unacceptable, the airport relies on environmentally damaging fossil fuels, and that the airport is not taking greater responsibility for the climate.	2	Please refer to response to Refs CC.1.7 and CC.2.1. The Proposed Development has been informed by an EIA, which considers the potential for the Proposed Development to give rise to likely significant effects on the environment. The EIA considers likely significant effects across a broad range of topics (for example,	No
CC.2.9	Concern that the benefits of the Proposed Development will be at the expense of the environment, the impact upon which outweighs the positive effect of the growth proposals. Respondents believe that the protection of the environment should be a priority, and are concerned that economic benefits to the area, including jobs, and short-term financial benefits for a few, are being prioritised above the protection of the environment. Respondents state that; there is insufficient mitigations proposed, the	15	biodiversity, greenhouse gases, air quality, noise, water) and the results are reported in the ES [TR020001/APP/5.01] , which accompanies this application for development consent. Through the EIA process, the mitigation hierarchy has been applied, which seeks to avoid significant adverse effects in the first	No

Ref	Comment	No. PILs	Response	Change
	Draft Need Case does not provide sufficient justification for the potential environmental damage, and that the economic benefits to neighbouring authorities won't significantly increase, but the environmental impacts will.		instance, before proposing measures to reduce significant adverse effects that cannot be avoided, and then finally as a last resort proposing compensation or offsetting measures where appropriate.	
CC.2.10	Concern that the Proposed Development is accelerating environmental degradation.	3	The Proposed Development also includes enhancement measures, for example it will deliver benefits for biodiversity by achieving at least 10% net gain in biodiversity.	No
CC.2.11	General concern that the Proposed Development will cause negative environmental impacts. Respondents are concerned that; the proposals, including increased flights, associated supporting infrastructure, and increased surface traffic, are not environmentally justifiable; Net zero is dubious; the environmental impacts will be short and long term, as well as local and global; the Applicant is not being clear about the impacts; banning local residents from using LBC facilities will cause an increase in transport miles related to waste, and; proposing mitigation acknowledges that damage will be caused by the Proposed Development.	50	<p>The Need Case [TR020001/APP/7.04], submitted with the application for development consent, sets out the need for the Proposed Development and the benefits arising from it, including jobs. Chapter 11 Economics and Employment of the ES [TR020001/APP/5.01] also sets out the economic benefits of the Proposed Development, in terms of likely significant effects, for both the UK as a whole and more locally for the Three Counties of Hertfordshire, Buckinghamshire and Bedfordshire.</p> <p>The benefits and adverse impacts associated with the Proposed Development, including any environmental and social</p>	No

Ref	Comment	No. PILs	Response	Change
			benefits/impacts, will be taken into account by the Examining Authority (ExA) in making a recommendation to the Secretary of State (SoS), who will make a decision in relation to the application for development consent.	
GHG Assessment				
CC.2.12	Concern that the Applicant has not included certain sources of emissions, especially from the increased number of flights, in the presentation and assessment of the Proposed Development and its impacts.	3	Please refer to response to Ref CC.1.25.	No
CC.2.13	Suggest that the Applicant publish, and publicise in the airport, the CO2 emissions associated with flights and the alternative modes of transport that could be used instead.	1	<p>The Applicant cannot report GHG emissions from aircraft which are outside of their direct control of the airport. The airlines have responsibility for GHG emissions from aircraft.</p> <p>With regards to non-aviation forms of transport, namely rail, existing and proposed international and domestic high speed rail routes generally do not serve the markets served by air from the airport (with domestic air services to Scotland and Northern Ireland making up only a very small proportion of total passengers). High Speed 1 and future services provided by High Speed 2, currently serve or will serve routes which have no impact on air travel</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>demand from the airport. It is accepted by Government that rail services can compete well with aviation on rail journeys of around two to three hours. Beyond that, air travel remains the mode of choice (Ref 24).</p> <p>Further afield, looking at alternative modes of transport to mainland Europe, including highly travelled destinations such as Paris, Brussels and Amsterdam, these are reflected in the baseline forecasts and provide competition to these more mature or highly visited parts of the European market.</p>	
Mitigation				
CC.2.14	Suggest that the Applicant offsets the environmental impact generated from the increased vehicular and aircraft movements.	1	The Applicant has committed to extensive measures to prevent and reduce carbon emissions rather than offsetting continued emissions, as is best practice. Residual emissions from airport ground operations will be offset as airport works towards carbon neutrality. Aircraft emissions are the responsibility of the airlines, with aircraft emissions already falling under the UK ETS and CORSIA offsetting schemes	No

Ref	Comment	No. PILs	Response	Change
			and will be reported and offset in line with UK legislation and policy. In respect of vehicular movements, the Applicant is committed to reduce surface access emissions to be carbon neutral by 2040.	
CC.2.15	Suggest that the airport and airlines are incentivised to operate within existing permissions and to implement all measures necessary to reduce the airport's carbon footprint.	2	Please refer to response to Ref CC.1.7.	No
CC.2.16	Suggest the Applicant reduce the carbon footprint of the airport by introducing incentives for low/zero emission vehicles, such as offering cheaper parking fees.	1	Please refer to response to Ref CC.1.7. Through the GCG Framework [TR020001/APP/7.08] , binding Limits on GHG emissions from surface access will be secured, with a commitment for surface access emissions to be carbon neutral by 2040. Encouraging electric vehicles is therefore part of the Applicant's approach to promoting sustainable travel to/from the airport, as set out in the Surface Access Strategy [TR020001/APP/7.12] .	No
CC.2.17	Suggest that the proposed mitigation should be implemented, without expansion of the airport. Respondents suggest that growth should only occur once decarbonisation of the existing airport has been achieved.	3	Measures to mitigate the impact of the existing airport are already in place, as demonstrated in the Applicant's overarching corporate Net Zero Strategy (Ref 1). For example, the airport	No

Ref	Comment	No. PILs	Response	Change
			<p>operator, LLAOL and the Applicant, have actively reduced Scope 1 and Scope 2 GHG emissions (these are direct emissions from the airport and controlled resources and indirect emissions associated with the purchase of electricity or heat, respectively). The carbon intensity of flight operations and surface access have also both been falling in line with industry trends.</p> <p>More recently, the Luton DART has been developed by the Applicant, which will further encourage sustainable travel to the airport. LLAOL is also continuing to bring forward additional measures to reduce the amount of carbon emitted by airport operations.</p> <p>The Applicant’s GCG proposals will mean that growth at the airport will only be delivered where limits on GHG emissions, amongst other impacts such as on aircraft noise, air quality, and surface access, are respected. Further information can be found in the GCG Framework [TR020001/APP/7.08] submitted as part of this application for development consent.</p>	

Table A5.3: Regard had to statutory consultation responses on Climate Change comments - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
General				
CC.3.1	General support for the Applicant's efforts to reduce the climate change and environmental impact of the Proposed Development. Respondents express support towards the; public transport connections; green strategy; responsibility and awareness of the airport; locally based workforce; reduced need to travel to other airports; reduced aircraft taxiing time; rainwater harvesting and drainage strategy; clarity of the PEIR, and; proposed energy utilisation.	15	Noted.	No
CC.3.2	Support towards the sustainability of the Proposed Development and the efforts made by the Applicant to make the airport environmentally, economically and socially viable. Respondents are in support of; the green values held by the Applicant; the understanding that aviation technology will become greener; the international standard that the Proposed Development's sustainability is setting; encouraging the latest generation aircraft and technologies, and; the Applicant's Green Controlled Growth approach to airport expansion.	14	Noted.	No
CC.3.3	Support towards the commitment to achieving net zero carbon emissions that the Applicant demonstrates.	4	Targets have been set for the aspects of the Proposed Development over which the Applicant has some control, including a goal of net zero emission airport operations and carbon neutral surface access by 2040..	No

Ref	Comment	No. CC	Response	Change
Climate emergency and meeting net zero policy				
CC.3.4	General concern that the Proposed Development, throughout its construction and operation, will increase the volume of emissions produced by the airport, including CO2 and other greenhouse gases. Respondents are concerned that; an expanded airport, increased flights and increased surface transport will increase emissions; the impacts will be felt beyond the local area; the proposals do not reduce existing levels of emissions; the burning of fossil fuels and kerosene is harmful; proposed materials, such as concrete/cement, have associated emissions; mitigation measures are insufficient; current technology does not reduce aviation emissions well enough to increase flights; there will be increased contrails, and; the Applicant is guilty of green washing the real impacts of the proposed increase in emissions.	564	Please refer to response to Ref CC.1.7 and CC.2.10.	No
CC.3.5	Concern that air travel is unsustainable and that aviation growth is irresponsible in light of the climate crisis and the sector's lack of social, economic and environmental integrity. Respondents are concerned that; aviation cannot be made sustainable; 'sustainable aviation' is a contradictory term; alternative transport modes which are greener should be invested in instead; planes should only use green fuels, and; the growth proposals only serve short-term financial interests rather than long-term sustainability goals.	340	Please refer to response to Ref CC.1.7. The UK Government's Jet Zero Strategy (Ref 4), representing current policy on aviation, states that: <i>"Our analysis shows that the sector can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth, with knock-on economic and social benefits."</i> Regarding the use of SAFs, the Jet Zero Strategy also commits the UK Government to having at least five UK	No

Ref	Comment	No. CC	Response	Change
			<p>SAF plants under construction, and a SAF mandate in place with a target of at least 10% SAF in the UK aviation fuel mix by 2030. Any future SAF mandate would be binding on the aviation fuel supply chain, rather than on airports. The Applicant will facilitate the use of SAFs within the airport (Ref 25).</p> <p>There is no SAF manufacture proposed in the Proposed Development. The fuel storage and distribution infrastructure proposed will be capable of receiving fuel with SAF as they are introduced.</p>	
CC.3.6	<p>Concern that the Proposed Development will prevent or slow the Applicant, as well as society more broadly, in meeting climate change reduction targets set at a national and international scale. Respondents are concerned that the following agreements, targets and legislation will not be met; UK Carbon Budget, Net-Zero goals, carbon neutral policies, green policies, COP26 agreements, Climate Change Committee advice, LBC obligations, and declarations of government and Local Authority Climate Emergencies.</p>	602	Please refer to response to Ref CC.1.7.	No
CC.3.7	<p>Concern that the Proposed Development goes against the advice of the Intergovernmental Panel on Climate Change to combat the progression of climate change. Respondents are concerned that; necessary urgent action is not being taken; a number of environmental impacts are now irreversible; global temperature rise is out of control</p>	53	Please refer to response to Refs CC.1.7 and CC.2.1.	No

Ref	Comment	No. CC	Response	Change
	and; aviation growth will not facilitate net-zero targets and needs to be reduced.			
CC.3.8	Concern that the Proposed Development, at the construction and operational phase, will contribute towards climate change, cause damage to the environment and move society closer to a climate emergency by exacerbating global warming. Respondents are concerned that; the proposed rate of growth is not sustainable, the carbon footprint of the airport will be unacceptable, the airport relies on environmentally damaging fossil fuels, and that the airport is not taking greater responsibility for the climate.	830	Please refer to response to Ref. CC.2.1.	No
Environmental impact				
CC.3.9	Concern that the benefits of the Proposed Development will be at the expense of the environment, the impact upon which outweighs any positive effects of expansion. Respondents believe that the protection of the environment should be a priority, and are concerned that economic benefits to the area, including jobs, and short-term financial benefits for a few, are being prioritised above the protection of the environment.	279	Please refer to response to Ref. CC.2.8.	No
CC.3.10	Concern that the Proposed Development will accelerate global extinction events and have a negative impact on wildlife worldwide. Respondents are concerned that; the window of opportunity to prevent irreversible damage to planetary health is	45	Please refer to response to Ref CC.2.10.	No

Ref	Comment	No. CC	Response	Change
	closing; current aviation practice is ecologically damaging, let alone following growth; economic growth leads to the loss of species; the Proposed Development will destroy habitats directly and indirectly, and reduce biodiversity, including migrating birds and; growth in aviation will have an especially negative impact on areas in the Global South.			
CC.3.11	General concern that the Proposed Development is accelerating environmental degradation and will cause irreparable negative impacts beyond the local area. Respondents are concerned that; harm will be caused during and after the construction phase; future expansions may cause further harm; the level of harm is not being made explicit and the Applicant is guilty of greenwashing; the proposals do not demonstrate corporate responsibility or sufficient Environmental, Social, and Corporate Governance by the Applicant; there is a lack of support from environmental organisations; the proposed mitigation and assessment of impacts is insufficient; the proposed materials are environmentally damaging, and; the only way of protecting the environment is to abandon any growth plans.	727		No
GHG Assessment				
CC.3.12	Concern that the Applicant has not included certain sources of emissions, especially from the increased	121	Please refer to response to Ref CC.1.25.	No

Ref	Comment	No. CC	Response	Change
	number of flights, in the presentation and assessment of the Proposed Development and its impacts.			
CC.3.13	Concern that there is no evidence to show that the airport's carbon emissions have been realistically costed in accordance with the latest Government measurement rules.	1	The costs of carbon and/or abatement are considered within the aviation need case forecasting model, which has been updated to reflect the Government's latest assumptions (Ref 26). Further uncertainties are reflected in the range of forecasts and sensitivity tests presented in the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent.	No
CC.3.14	Concern that no environmental impacts are monetised by Luton Rising in their assessment, despite noise, air quality, and greenhouse gas emissions all having robust methodologies by which they can be measured and monetised.	1	The GHG emissions assessment presents the carbon impact of the Proposed Development in terms of emissions in tonnes of CO2 equivalent. The cost of carbon is considered in the context of the broader economic appraisal within the Need Case [TR020001/APP/7.04] but, as the costs of carbon are fully accounted for in the demand forecasts, including the costs of carbon in the economic appraisal is arguably double counting of the impacts.	No
Mitigation				
CC.3.15	Suggest that the Applicant offsets the increased carbon emissions generated from the Proposed Development. Respondents suggest; using income from the airport to invest in active travel locally, such as cycling infrastructure; investing profits into cutting carbon and funding green aviation research;	29	Please refer to response to Ref CC.2.14.	No

Ref	Comment	No. CC	Response	Change
	contributing to the circular economy; planting more trees and green roofs; imposing mandatory passenger contributions towards offsetting schemes, and; ensuring DART is carbon neutral. Some respondents also suggest that carbon trading credits and caps on growth are not valid forms of offsetting and should not be relied on by the airport.			
CC.3.16	Concern that the carbon offsetting measures practiced by some airlines need to be verified. Respondents are concerned that; the planting of trees to offset carbon is not sufficient; it is not clear whether the airport requires airlines to demonstrate how they are offsetting their emissions, to what degree and their future plans for offsetting, and buying carbon offset credits does not make aviation a sustainable form of transport.	3	It is beyond the scope of this application for development consent to verify the carbon offsetting schemes used by airlines. The carbon pricing impact of Carbon Offsetting and Reduction Scheme for International Aviation (CORSA) has been factored into emission from air traffic movements (ATM) emissions, however any further use of carbon offsetting schemes has not been included as part of the GHG emissions assessment, provided in Chapter 12 Greenhouse Gases of the ES [TR020001/APP/5.01] ,	No
CC.3.17	Suggest that given the vast disparity between airport based emissions and aircraft based emissions, any alternative green industries that could provide local economic benefit would need to be on a significantly larger scale than envisaged in the consultation documents.	1	In addition to the benefits associated with the Proposed Development, the Applicant is currently bringing forward (or has plans in place to bring forward), other development programmes separate to those included in the application for development consent, which would help address matters such as the green sector. The Employment and Training Strategy [TR020001/APP/7.05] , submitted as part of this application for development consent, has been developed to ensure that local residents can take	No

Ref	Comment	No. CC	Response	Change
			advantage of the additional jobs created from the Proposed Development, including any of those related to the Proposed Development that may be within the green sector.	
CC.3.18	Suggest that the proposed mitigation should be implemented without expansion of the airport. Respondents suggest that; mitigation will reduce the existing impact of the airport; growth should only occur once decarbonisation of the existing airport has been achieved; the Green Controlled Growth framework should be implemented without expansion to maximise environmental benefits; the airport should adhere to existing environmental commitments; fuel use reduction should be introduced now, and; home insulation, car charging points, solar panels, heats pumps, traffic calming, social facilities and landscaping should be funded instead of expansion.	92	Please refer to response to Ref CC.2.17.	No
CC.3.19	Suggest that the airport should implement aviation carbon reduction schemes. Specific suggestions include: reducing existing subsidies that airports and airlines benefit from; disincentivising air travel; increasing the cost of air travel to reflect its impact through carbon/flight/fuel taxation in the form of an Air Passenger Duty or Frequent Flyer Levy; heavily taxing private air travel; imposing penalties for unfilled flights or planes that don't meet certain environmental credentials; encouraging fuel efficient	49	Government has made it clear that it does not support capping growth in aviation, to meet net zero or any other carbon target (Ref 4). The demand the Proposed Development is intended to meet is largely local to Luton and surrounding areas. This is projected to remain the same over the longer term. The impacts of the Proposed Development have been assessed through the EIA process and will be considered in full through the examination of the application for development consent. The Need Case	No

Ref	Comment	No. CC	Response	Change
	<p>aircraft through discounted landing fees for such planes; ensuring that all elements of scope 3 emissions (landing, take-off and descent) are subject to a Carbon Reduction Plan; and ensuring fuel companies operating existing and proposed storage facilities on-site comply with the UKSAF mandate from 2025.</p>		<p>[TR020001/APP/7.04], submitted as part of the application for development consent sets out the demand forecasts upon which the Proposed Development is based.</p> <p>The cost of flying generally is outside the control of the Applicant or the scope of the application for development consent. The demand forecasts take full account of Government policies on climate change. The demand forecasts assume that the costs of carbon and/or abatement are met by users of the airport and are consistent with the Government's Jet Zero Strategy (Ref 4).</p> <p>Furthermore, many airlines are increasingly adopting the Carbon Offsetting and Reduction Scheme for International Aviation (CORSA), with these costs expected to be passed on to air fares in some form.</p> <p>It is for Government to determine whether it wishes to tax private air travel further, however the assumptions used in the demand forecasts mirror those used by Government in its analysis underpinning the Jet Zero Strategy (Ref 4).</p> <p>The existing flights at London Luton Airport (pre-pandemic) already operate with very high load factors. These are expected to be over 90% on average in busy periods. It is not possible to sustain average load factors materially higher than this as, whilst an outbound flight may be full such as at the start of the</p>	

Ref	Comment	No. CC	Response	Change
			<p>holidays, a return flight may necessarily operate with a lower load factor. In the peak period, it is already assumed that load factors will be high, but they will tend to be lower in off-peak periods.</p> <p>The airlines are transitioning to a newer fleet in order to realise savings in operating cost, principally through fuel efficiency. This transition is planned through their fleet acquisition programmes, which have recently been reconfirmed. Fleet transition is further incentivised through the GCG approach, as set out in the GCG Framework [TR020001/APP/7.08], submitted as part of the application for development consent. Expansion of the airport must take place within the Limits set by GCG.</p> <p>With regards to carbon reduction mitigation please refer to the response to Ref CC.1.7.</p> <p>With regards to the UKSAF mandate, please refer to the response to Ref CC.3.5.</p>	

Ref	Comment	No. CC	Response	Change
CC.3.20	Suggest the Applicant reduces the carbon footprint of the airport and its operations. Respondents suggest this could be achieved by; providing electric/hydrogen buses for local staff; stopping the consumption of fossil fuels; harnessing renewable energy sources through installing wind turbines, solar panels or ground source heat pumps; focussing on existing carbon commitments rather than expanding; and employing a climate champion within each department of the airport organisation.	28	<p>Please refer to response to Refs CC.1.7, CC.1.25 and CC.2.1.</p> <p>Both the Applicant and airport operator have dedicated senior Sustainability Managers and teams in place, reflecting their commitment to the issue of climate change. Additionally, it may be noted that the Applicant's shareholder, LBC, has assigned climate champion status to one of its Executive Portfolio Holders.</p>	No
CC.3.21	Suggestion that the Applicant should commit to measuring CO2 regardless of expansion and that the consultation should stop until stakeholders can review data relating to the airport's carbon footprint emissions measured in tonnes of CO2 equivalent.	1	Please see the response to Ref. CC.2.17.	No

A6: NOISE

Table A6.1: Regard had to statutory consultation responses on Noise comments - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
Noise - General						
NV.1.1	We accept that there has been on-going discussion through the Noise Working Group and the NEDG but we remain concerned by the assessment of this topic to date. We consider that this is a key environmental issue in terms of the acceptability of the Proposed Development and believe that significant further engagement will be required.		Host Authorities	4	Noted. The Applicant has prepared a robust assessment of the noise impact of the Proposed Development following best practice guidance as applicable, this can be found in Chapter 16 Noise and Vibration of the Environmental Statement (ES) [TR020001/APP/5.01] . The Applicant has continued engagement with the Host Authorities throughout the project development. A Statement of Common Ground [TRO20001/APP/7.26] has been developed with the Host Authorities to capture points of agreement and issues yet to be agreed.	No
NV.1.2	We welcome the study into the use of displaced thresholds for smaller aircraft operating at night and the commitment to implement any recommendations by 2025		Buckinghamshire County Council	1	Noted. This is a proposal by the Airport Operator, London Luton Airport Operations Limited (LLAOL), under their Noise Action Plan (Ref 27) and is not a DCO	No

Ref	Comment	PC	LA	No PILs	Response	Change
					commitment. The noise assessment of the Proposed Development, as described in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , assumes no benefit from displaced landing thresholds as a reasonable worst case.	
NV.1.3	Noise contour area limits have been set around the airport to protect the local residents where aircrafts are low flying. It is understood that HDC already has a flight height agreement over Huntingdonshire resulting from the stacking consultation by the airport.		Huntingdon shire District Council	1	This relates to the AD6 Airspace change proposal implemented in February 2022 not the Proposed Development. Any future changes to airspace will be part of the Civil Aviation Authority's Airspace Change Process and subject to a separate consultation exercise.	No
NV.1.4	Forecasting is substantially reliant on:- <ul style="list-style-type: none"> • the increased use of quieter aircraft in the future; • assuming a fleet mix of fewer, but larger, aircraft; and • working with the National Air Traffic Service and airlines to reduce hold times in the air and on the ground These matters are not, however, within the direct control of the applicant.		St Albans City and District Council		The forecast future fleet mix is based on the known airline aircraft orders for types of aircraft that are already being delivered and operated, please refer to the Need Case [TR020001/APP/7.04] for more information. These new generation aircraft tend to have more seats than those they replace and this has been taken into account in the demand forecasts. Greater use of larger	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>(Code E) aircraft is not assumed until later stages of delivery and even then they only make up a small proportion of all aircraft movements.</p> <p>The airfield design provides additional taxiway infrastructure enabling the number of aircraft movements that the runway can handle to be increased without leading to additional delays. The provision of the infrastructure to enable this increase in movements is within the control of the Applicant.</p>	
NV.1.5	The Wendover area is impacted by both traffic from Luton and Heathrow at levels below 7,000 ft. It will also be impacted by additional rail noise from the HS2 development which will occur in the period of the Luton expansion. It appears that because Wendover is outside the zone of influence of both airports it is scoped out of the cumulative impact assessment. Whilst the anticipated air space changes will hopefully improve the situation in Wendover, these are not guaranteed. Given the expansion		Buckingham shire County Council	1	Potential cumulative impacts for airspace outside the Lowest Observable Adverse Effect Level (LOAEL) and up to 7,000ft will be assessed through the Airspace Change Proposals if there are anticipated to be any cumulative impacts between Luton and Heathrow. This will be the subject of a separate consultation exercise by the airport operator, LLAOL, following the Civil Aviation Authority (CAA) airspace	No

Ref	Comment	PC	LA	No PILs	Response	Change
	plans for both Heathrow and Luton and the potential for large increases in air traffic movements in this area we believe that Wendover should be treated as a special case and the potential cumulative impacts should be assessed.				change procedure (CAP1616), in due course. HS2 and Heathrow Airport are included in the list of 'other developments' considered in the Chapter 21 In-combination and Cumulative Effects Assessment of the ES [TR020001/APP/5.01] and Appendix 21.1 Long List of Other Developments and Appendix 21.2 Short List of Other Developments of the ES [TR020001/APP/5.02] .	
NV.1.6	[PEIR Volume 3: Appendix 16.1] There appears to be an error in Table 87; the core case in the table heading refers to year 2043, but the table title and sensitivity refers to year 2039. There also appears to be an error in Table 88; the core case in the table heading refers to year 2043 but the table title and sensitivity refers to year 2039.	Civil Aviation Authority			Noted and corrected in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	Yes
NV.1.7	[PIER ch 5] The Planning Inspectorate's Scoping Opinion (Section 4.5) stated that ... Please clarify whether this is in or out of scope as this is not clear from Table 5.1, which states that 'Noise and vibration from earthworks and	Civil Aviation Authority			Operational vibration from road traffic has been scoped out. This was accepted in the Scoping Opinion. In line with the Scoping Opinion and Scoping Report [TR020001/APP/5.05] , a qualitative assessment of	No

Ref	Comment	PC	LA	No PILs	Response	Change
	construction of the airport infrastructure' is in scope, but 'Traffic vibration' is scoped out.				vibration from construction traffic vibration has been undertaken in line with the methodological approach set out in the Design Manual for Roads and Bridges (DMRB) (Ref 28). This assessment can be found in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	
NV.1.8	The Applicant should change the heading in Table 16.4 from "Legislation" to "Guidance".	United Kingdom Health Security Agency		1	Noted and corrected in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	Yes
NV.1.9	In [PIER] Table 16.14, there appears to be a typo, where '2.0' in the minor row should be changed to '1.0', otherwise a noise level change between 1 and 2 dB is not accounted for.	United Kingdom Health Security Agency		1	Noted and corrected in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	Yes
Noise - Impacts						
NV.1.10	Our wider concern is that the noise assessment concludes that a significant adverse effect will result and that this will arise in 2043 when the throughput is at 32mmpa, countering any improvements in the air noise climate that appear to occur up to 2039 as a result of fleet		Host Authorities	4	As a reasonable worst-case, the noise assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] assumes that next-generation aircraft (that are expected to enter the fleet from the mid-2030s) are no quieter than new-generation	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>modernisation. Air noise levels are expected to increase in the day and night between 2039 and 2043 as no new generation aircraft are expected to come into service as the fleet is as modernised as possible by 2039. As Suono state in their analysis, this is in contradiction to two key parts of the government's ANPS 2018, where "The benefits of future technological improvements should be shared between the applicant and its local communities, hence helping to achieve a balance between growth and noise reduction.". This is also a key noise objective made within the Aviation Policy Framework 2013 (section 3.29, bullet 2) with near identical wording.</p>				<p>aircraft. Increases in overall air noise levels are therefore forecast between 2039 and 2043. The ES noise chapter also includes a sensitivity test assuming that next-generation aircraft continue the long-term trend of reducing noise levels. The sensitivity test shows that such a level of technology improvement would more than offset the increase in overall day and night-time noise exposure due to the increase in the number of aircraft movements between 2039 and 2043. To secure such improvements (if next generation aircraft are quieter) the proposed Noise Envelope (see the GCG</p>	
NV.1.1 1	<p>In effect, the improvements in the noise climate that will otherwise be experienced by the communities around the airport, despite the expansion up to 2039, will be subsequently eroded and then lost altogether. This remains a considerable concern to the HAs and a key factor to weigh in the planning balance in the context of MBU policy.</p>		Host Authorities	4	<p>Explanatory Note [TR020001/APP/7.07] has been updated to include five-yearly Noise Limit Reviews (that will be legally binding and enforceable) to reduce noise Limits in future years if future technology (next generation aircraft or airspace change) results in noise reduction. This will avoid any significant noise effects and</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>ensure the benefits of future next-generation technology are shared with the community in line with aviation noise policy. In the event that next-generation aircraft are no quieter than new-generation aircraft then effects would be as reported in the ES and significant adverse effects on health and quality of life due to noise will be avoided by the enhanced offer and installation of full noise insulation.</p>	
<p>NV.1.1 2</p>	<p>LLA lies within an area of closely sited large towns and cities which are already significantly impacted by noise from air traffic arriving at and departing from LLA, including Hemel Hempstead, Harpenden, St Albans, Stevenage and Luton. Because of the flightpaths areas of countryside within Dacorum (such as the Chilterns AONB and the Chilterns Beechwoods SAC) experience adverse impact on tranquillity and some settlements already experience severe localised impacts such as Markyate and Flamstead.</p>		<p>Dacorum BC</p>	<p>1</p>	<p>The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise pollution. Further details can be found in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01].</p> <p>An additional assessment of tranquillity on human and heritage receptors has been undertaken in response to responses to the 2022 statutory consultation. The assessment is presented in Chapter 16 Noise</p>	<p>No</p>

Ref	Comment	PC	LA	No PILs	Response	Change
					and Vibration of the ES [TR020001/APP/5.02] and has also informed other assessments in the ES, namely the impact of the noise change on the setting of heritage assets in Chapter 20 Cultural Heritage and the impact of tranquillity on landscape receptors including the Chilterns AONB in Chapter 14 Landscape and Visual .	
NV.1.1 3	A 60% increase in flights to 240,000 a year (an additional 103,000 flights) will inevitably result in greater noise impacts across the wider Dacorum area. Using figures within the PEIR in the Summer quarter average noise levels around LLA will increase by between 1.2dBA Leqt - 3dBA Leqt.		Dacorum BC	1	The increase in air noise levels between the scenario with and without the Proposed Development in future years varies over time, reaching a maximum of 1.0 – 2.9 dB in 2043. However, the noise assessment demonstrates that in future years (with or without the Proposed Development), there will be less people affected by aircraft noise than in the 2019 Actuals baseline. No unacceptable adverse effects have been identified.	No
NV.1.1 4	In summary, DBC considers that the expansion proposals cannot be achieved without significant impacts from [noise] pollution, nor are measures proposed that will provide suitable control over them, as required by both national and local policy.		Dacorum BC	1		No

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.1 5	Most flights departing from London Luton Airport follow a flight path that already has a significant impact on residents in Central Bedfordshire. There is strong concern that the expansion proposals would exacerbate the detrimental impact on local residents due to the increased number of flights, and this is deemed unacceptable.		Central Bedfordshire Council	1	The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise pollution, including Noise Insulation Scheme and a Noise Envelope (further details can be found in the GCG Framework [TR020001/APP/7.08]). Under the Noise Insulation Schemes households likely to experience significant effects as a result of the difference in air noise resulting from the Proposed Development would be eligible for noise insulation. A 'Noise Envelope' is a framework of legally binding and enforceable limits and controls to manage air noise.	No
NV.1.1 6	The Council also notes that the increased noise levels are forecast not to affect Buckinghamshire until 2043, when a small area of South East Bucks would be affected by the night time LOAEL of 45dB LAeq. (Lowest Observable Adverse Effect Level). For context, 40dBa is approximately equivalent to a suburban area at night, and a 3dBa increase equates to a doubling of the sound energy level.		Buckinghamshire County Council	1	Further details can be found in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . Information about the Noise Insulation Schemes can be found in the Draft Compensation Policies, Measures and	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Community First [TR020001/APP/7.10].</p> <p>The Applicant has developed GCG proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the GCG Explanatory Note [TR020001/APP/7.07] submitted as part of this application for development consent.</p> <p>Section 16.2 in Chapter 16 Noise and Vibration also includes a summary of how national and local noise policies are met by the Proposed Development.</p>	
NV.1.1 7	Daytime noise levels modelled for each of the 3 phases down to a minimum of 45dB illustrates there is no impact on East Herts for any of the 3 phases. As nothing quieter than		East Herts District Council	1	Noted. Noise below the LOAEL is identified in Planning Practice Guidance - Noise (PPGN) (Ref 29) as “ <i>No Observed Adverse Effect</i> ” and that at noise levels	No

Ref	Comment	PC	LA	No PILs	Response	Change
	45dB has been modelled, this is taken to mean that any possible daytime effect on the district would be quieter than 45dB and therefore unlikely to be heard.				below the LOAEL “ <i>Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life.</i> ”	
NV.1.1 8	It is noted that the night-time contours do impact East Herts district in a very small localised area to the North East between Stevenage and Walkern. Phase 1 shows no impact, phase 2a shows a negligible change between 0.1 - 1.9dB and phase 2b shows a minor change between 2-2.9dB as defined by planning practice guidance noise significance criteria. The impacts are both recorded at the LOAEL and not above; therefore, no mitigation or compensation is necessary or being sought for the proposals as they currently stand, beyond those proposed as part of the mitigation packages detailed within the consultation		East Herts District Council	1	Noted.	No
NV.1.1 9	Noise modelling has been carried out close to Luton which shows that the noise levels would be negligible at		Huntingdonshire District Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	any other location outside of the Luton/Stevenage area.					
NV.1.20	The Council remains very concerned about the potential impact of any increase in noise levels arising from the expansion of the airport.		Stevenage Borough Council	1	Please refer to the response to Ref NV.1.13.	No
NV.1.21	The flight paths for arrivals and departures, for Luton Airport, operate over Stevenage (easterly operations depart over Stevenage, and westerly operations arrive over Stevenage). An increase in capacity at Luton Airport would directly result in the number of aircrafts operating over Stevenage in both an easterly and westerly directions. Our concerns are that this would result in increased diurnal and nocturnal aircraft noise above Stevenage and therefore impacting on the health and wellbeing of our residents.		Stevenage Borough Council	1	<p>Please refer to the response to Ref NV.1.13.</p> <p>For Stevenage, the increase in air noise levels between the scenario with and without the Proposed Development in future years varies over time, reaching a maximum of 1.0 – 2.9 dB in 2043. However, the noise assessment demonstrates that in future years (with or without the Proposed Development), there will be less people affected by aircraft noise in Stevenage than in the 2019 Actuals baseline (the actual aircraft noise environment that occurred in 2019).</p> <p>An assessment of the impact of the Proposed Development on health and wellbeing has been undertaken and can be found in</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Chapter 13 Health and Community of the ES [TR020001/APP/5.01].	
NV.1.2 2	It is noted that the nocturnal noise contours extend over Stevenage and with development proposed to the west of the A1(M), this means that there will be an increase in the number of residents that will be affected by the noise of aircraft operating at Luton Airport regardless of the proposed expansion. This is supported by figure 16.22, Extent of 2043 DS 8h Noise Contours, which shows that the 51dB noise contour extends much further into Stevenage, directly above the West of Stevenage development which is an allocated site in the Stevenage Borough Local Plan and was granted planning permission in December 2021.		Stevenage Borough Council	1	Please refer to the response to Ref NV.1.13 and NV.1.2.1. The noise assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] is based on population census data from the 2019 baseline. An assessment of noise impacts on committed developments has been undertaken on an individual receptor basis and is presented in Appendix 16.1 Noise and Vibration Methodology and Data of the ES [TR020001/APP/5.02].	No
NV.1.2 3	Noise was the main issue reported by residents in a survey Kings Walden Parish Council conducted this month to canvas residents' views on the proposed airport expansion plans. Noise was a problem for residents in 2019; expansion would inevitably lead to more noise.	Kings Walden Parish Council		1	Please refer to the response to Ref NV.1.13.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.2 4	<p>Residents have reported:</p> <ul style="list-style-type: none"> • Regularly disrupted sleep • Not being able to hear conversations in person or on the phone • Difficulties caused by noise when working from home (which is now the norm for many) • Noise negatively impacting on their enjoyment of leisure time in their homes, gardens and out walking • Noise disturbs wildlife which in turn disturbs residents 	Kings Walden Parish Council		1	<p>Please refer to the response to Ref NV.1.13.</p> <p>A quantitative assessment of a range of health outcomes likely to occur as a result of changes from aircraft noise has been undertaken and is set out in Chapter 13 Health and Community of the ES [TR020001/APP/5.01]. The health outcomes reported include annoyance, self-reported sleep disturbance, Acute Myocardial Infarction (AMI) and hypertension (stroke and dementia). These outcomes are supplemented by an additional assessment of the likely impacts of the Proposed Development on annoyance, using the exposure-response relationship presented in the 2018 World Health Organisation Environmental Noise Guidelines (Ref 30). An assessment on the likely impact on sleep disturbance, through calculation of additional awakenings, has also been undertaken.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>The Proposed Development will retain the limit of 9,650 movements over a rolling 12-month period during the period of 23:30 to 06:00.</p> <p>Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] assesses all potential impacts to biodiversity as a result of the Proposed Development. The Applicant has set a voluntary ambition of achieving at least 10% Biodiversity Net Gain (BNG). This is detailed within the BNG report in Appendix 8.5 of the ES [TR020001/APP/5.02]. BNG will be secured through the extensive landscaping and habitat creation proposals incorporated within the Proposed Development.</p>	
NV.1.2 5	In the first lockdown the lack of noise from ground operations was noticeable. A second, closer terminal will bring even more constant noise closer to residents	Kings Walden Parish Council		1	The noise assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] demonstrates that, although the proposed Terminal 2 would be located closer to residents than Terminal 1, the buildings that form the Proposed Development	No

Ref	Comment	PC	LA	No PILs	Response	Change
					will act as screening for the closest receptors directly to the north. Additionally, there are noise barriers proposed at the airside boundary that will partially screen noise from ground activities at the proposed Terminal 2, please see the Scheme Layout Plans [TR020001/APP/4.02] and Works Plans [TR020001/APP/4.04] . The assessment concludes that there will be no significant effects of noise on health and quality of life due to noise from ground operations.	
NV.1.2 6	The noise from aircrafts isn't the only issue, they cause vibrations within houses directly under the flight path.	Kings Walden Parish Council		1	Noise inside houses can be perceived as noise-induced vibration which is taken into account in the assessment of air noise. Vibration from aircraft on the ground has been assessed and has concluded that there will be no significant effects. The impact of noise and vibration from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce	No

Ref	Comment	PC	LA	No PILs	Response	Change
					noise pollution, including Noise Insulation Scheme and a Noise Envelope. Further details can be found in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	
NV.1.2 7	The airport cannot control the modernisation of fleets and noise levels will increase during the coming years not decrease if the number of flights increase by the 40% envisaged by the plan.	Kings Walden Parish Council		1	The airport can incentivise the adoption of quieter aircraft and there is an industry trend of adoption that is reflected in the forecast.	Yes
NV.1.2 8	With regard to the noise impacts, Luton Airport must ensure these proposals do not exacerbate impacts on health and quality of life and that any noise reduction resulting from new technologies benefits residents, rather than being banked to enable more flights.	Transport for London			<p>The proposed Noise Envelope within the GCG Framework [TR020001/APP/7.08] has been updated to contain a mechanism for the noise limits (that will be legally binding and enforceable) to be reduced in future years if future technology (next generation aircraft or airspace change) results in noise reduction. This will ensure the benefits of future next-generation technology are shared with the community in line with aviation noise policy.</p> <p>More information on how the Noise Envelope has been</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					developed in line with aviation policy and guidance, including how the benefits of next-generation aircraft technology will be shared between the airport and the community, is provided in Appendix 16.2 Operational Noise Management (Explanatory Note) of the ES [TR020001/APP/5.01]	
NV.1.29	Slip End Parish is firmly within the 57 db contour (PEIR 4 Fig 16.4), with maximum noise in the Pepperstock area under the westerly take off, though there is also noise from inbound easterly flights at the north end of the parish. Noise exceeding 60 db is found at location ML12, adjacent to the M1. However, this data is drawn from monitoring sites ML9 (Manor Farm) and ML26 (Pepsal End Farm), which are peripheral to the main takeoff line, and lie at a lower altitude and further distance from the airport than the hamlet of Pepperstock, so almost certainly underestimate noise levels.	Slip End Parish Council		1	The relative location of the noise monitors to arriving and departing aircraft is taken into account in the noise model validation. Details of the noise model validation process are provided in Appendix 16.1 Noise and vibration information of the ES [TR020001/APP/5.02] .	No

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.3 0	UKHSA also recognises the developing body of evidence showing that areas of tranquillity offer opportunities for health benefits through psychological restoration. NSIP applications need to demonstrate that they have given due consideration to the protection of the existing sound environment in these areas.	United Kingdom Health Security Agency		1	An assessment of tranquillity on human receptors in accordance with National Planning Policy Framework (Ref 31) paragraph 185b has been undertaken and is presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The impact of noise (amongst other factors) on tranquillity for landscape receptors, including the Chilterns AONB is assessed in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] . The impact of noise (amongst other factors) on the setting and tranquillity of heritage receptors is assessed in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] .	Yes
NV.1.3 1	The area of relevance to National Highways lies to the southwest of M1 J10 and comprises a number of residential properties within the hamlet of Pepperstock. - During construction, the northbound off-slip is proposed to be widened to receive three lanes on the approach to the roundabout bringing the noise	National Highways		1	The assessment of construction noise in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] includes an assessment of noise and vibration impacts from the widening of the M1 J10, the use of the proposed construction compound and construction traffic	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>envelope closer to the properties located here. There is also a tract of land to be used for a construction compound which could have the potential for temporary detrimental effects on the nearby residential properties</p> <p>- There is a small Noise Important Area (NIA 5232) immediately to the south of the proposed construction compound containing residential properties that have recently been mitigated (January 2020) through noise insulation and there is good quality noise barrier running adjacent to the M1 northbound off-slip. However, the construction of the proposed lane widening and an increase in works traffic will have temporary impacts, noise from increased traffic flow and vibration from the construction (piling, vibratory roller etc.), particularly during any night works. The properties found to the south of Half Moon Lane and Front Street that do not reside in the NIA will also be potentially impacted depending on construction methods in this area.</p>				<p>noise and vibration. Operational noise and vibration have also been assessed. No significant effects from these noise sources have been identified in the areas mentioned. Changes within all Noise Important Areas in the study are predicted to be negligible to minor and not significant.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>- The PEIR does not have any references to the area surrounding the proposed construction compound and this will need to be addressed in the full ES. Further investigation may be required to identify the significance of construction noise and vibration annoyance effects on these properties.</p> <p>- Operational noise and vibration will be of much less significance but will still require an investigation to assess the magnitude of impact and to avoid the risk of annoyance.</p>					
Noise - Assessment						
NV.1.3 2	Suono raise a range of other technical issues regarding the noise assessment. It is concerning that despite the critical importance of this issue and the extent of dialogue, there are still apparent methodological and assessment issues being raised. For example, the comparison of noise levels as between 2019 and 2043 uses the 2019 baseline when the airport operator was breaching the current Condition 10 and is not therefore an appropriate comparison. We would		Host Authorities	4	<p>Noted. The Applicant has continued engagement with the Host Authorities throughout the project development. A Statement of Common Ground [TRO20001/APP/7.26] has been developed with the host authorities to capture points of agreement and issues yet to be agreed.</p> <p>With reference to The Infrastructure Planning (Environmental Impact</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>clearly welcome further dialogue on this topic prior to the application being made.</p>				<p>Assessment) Regulations 2017 (the EIA Regulations) (Ref 32) (which refers to the baseline scenario as “a description of the relevant aspects of the current state of the environment”), it is considered appropriate to model the noise impact that occurred in 2019 using actual air traffic movement data to represent the ‘current baseline’. However, in response to the 2022 statutory consultation feedback, a sensitivity test has been undertaken using a ‘2019 compliant’ baseline modelled using a theoretical 2019 fleet that would have been compliant with the current consented short-term noise limit. This sensitivity test is presented in Appendix 16.1 Noise and Vibration Information of the ES [TR020001/APP/5.02] and summarised in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01].</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.3 3	The Environmental Protection Team note in relation to “in-combination and cumulative effects” that there are many developments coming forward, and Luton Rising should ensure that these are taken into consideration, especially as they may have been consented on different noise assumptions to those that may arise from the airport expansion.		Luton Borough Council	1	The noise assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] is based on population census data from the 2019 baseline. An assessment of noise impacts on committed developments has been undertaken on an individual receptor basis and is presented in Appendix 16.1 Noise and Vibration Information of the ES [TR020001/APP/5.02] . Chapter 21 In combination and Cumulative Effects of the ES includes an updated assessment of the cumulative effects of the Proposed Development with other development schemes.	Yes
NV.1.3 4	The Independent Commission on Civil Aviation Noise have recommended that additional noise metrics, such as N70, N65 and N60 are used in conjunction with LAeq measurements, which can also be used in conjunction with parameters as Noise Violation Limits NVLs, used within the noise control scheme.		North Herts DC	1	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref 33) and guidance from the CAA (Ref 34) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics (which are based on maximum noise levels, i.e. individual overflights and “sudden loud events”) including N65 and N60	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . Information on these metrics, and how they have been used in the assessment, are provided in Section 16.5 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]	
NV.1.35	Overall, there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EIA, so that there is a consistency of approach for considering metrics that are used within Planning Permissions, Noise Control Scheme, Noise Action Plans, and Compensation Policies and measures		North Herts DC	1	<p>Please refer to the response to Ref NV.1.34. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within the GCG Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p> <p>Information on the primary and supplementary noise metrics, and how they have been used in the assessment, are provided in Section 16.5 of Chapter 16</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					Noise and Vibration of the ES [TR020001/APP/5.01]	
NV.1.3 6	NHC asks LR to: Provide detail of the metrics used within the PEIR and Environmental Statement, so that there is a consistency of approach with Planning Permissions, Noise Control Schemes, Noise Action Plans, and Compensation Policies and measures.		North Herts DC	1	Please refer to the response to Refs NV.1.34 and NV.1.35.	Yes
NV.1.3 7	Experience of noise can be subjective and also intermittent. The Leq industry standard used to predict averages can be misleading. The average noise levels forecast for the 16 and 8 hour periods do not reflect the existing and forecast increases in intrusion such as sudden loud events within longer periods of relative silence. In any event the figures still show a significant increase in noise.		Dacorum BC	1	Please refer to the response to Ref NV.1.34.	Yes
NV.1.3 8	DBC suggests that calculating average noise from a number of relatively short but very loud events within longer periods of relative silence does not produce a meaningful criteria for noise nuisance in the real world.		Dacorum BC	1	Please refer to the response to Ref NV.1.34.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.3 9	<p>Airports should devise their noise managements plans (NMP) reflecting feedback from residents. The nature of complaints and how they impact is given limited discussion within the PEIR but could inform additional criteria for assessing significance. There is a discrepancy in that the NMP discusses night flights between 23:00 – 06:00 but modelling is based on a night period of 23:00 – 7:00. Whilst the NMP implies no increase in night flights, yet modelling shows under the 2039 DS scenario compared to 2029 DN, noise contours increase. This would suggest an increase in night flights. This disparity may arise because of what is defined as night for modelling purposes (23:00 – 7:00) and night for the airport (23:00 – 6:00). These periods should align for consistency and the apparent discrepancy further explained and addressed.</p>		Dacorum BC	1	<p>The Department for Transport (DfT) set night-time noise control measures for designated airports (Heathrow, Gatwick and Stansted) under section 78 of the Civil Aviation Act 1982 (Ref 35). DfT set quota-count limits for aircraft noise over the night-quota period, which is defined for this purpose as 23:30-06:00. These limits were retained as part of the privatisation of UK airports and have been adopted as control measures in other airports including London Luton Airport. However, the assessment of aircraft noise is undertaken based on UK policy requirements (e.g. the Aviation Policy Framework), which defines the night period as 23:00-07:00. Consequently, although the existing night quota period movement limit will be retained, there will be increased movements in the periods from 23:00-23:30 and 06:00-07:00 that are fully assessed in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01].</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.40	If the hour between 06:00 – 07:00 is still considered night, and a period when people would reasonably expect to have undisturbed sleep, should there be a significant upturn in departures then there may be a greater impact potential that is not being reported, especially based on maximum noise events. Guidance 8 published by the Institute of Environmental Management (IEMA) present a similar analysis as opposed to a simple average over a long term, so impacts may be more significant than presented.		Dacorum BC	1	The assessment of noise is undertaken based on aviation noise policy requirements to assess night-time noise during the period of 23:00-07:00 (Ref 30). The period from 06:00 to 07:00 is part of this night-time period and the impacts that occur during this period are included and reported in the assessment of night-time noise in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No
NV.1.41	The whole of the Buckinghamshire administrative area currently falls outside the LOAEL contours (both day and night) for Luton Airport. However, the 92 day summer average day/night noise, as measured by the LOAEL doesn't reflect the noise generated by individual overflights or at periods of peak activity. It is these issues that generally raise complaints from Buckinghamshire residents.		Buckinghamshire County Council	1	Please refer to the response to Ref NV.1.34.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.4 2	The PEIR assessments indicate that even when all phases are complete no properties in Buckinghamshire will experience noise levels above the LOAEL either during the day or night, although the final phase night-time contour extends just across the Buckinghamshire border.		Buckinghamshire County Council	1	Noted. An updated noise assessment is presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No
NV.1.4 3	Locally, by 2043 noise levels at Dagnall and Pitstone are likely to be 2 to 3dB higher than they would be without the development. The PEIR assumes the modernisation of the fleet will reduce aircraft noise in the future this noise levels will only actually rise by 1 to 2dB over 2019 baseline levels. Elsewhere in Buckinghamshire rises are likely to be less than this, but changes will be dependent on airspace changes that will occur in the future. In acoustic terms such increases are not significant and would be impossible to discern to members of the public, especially as they will increase gradually over a 20 year period. But as stated above in these areas it is not the overall noise level generated by Luton flights but the impact of individual flights, especially at peak		Buckinghamshire County Council	1	Please refer to the response to Ref NV.1.34.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	times when aircraft noise will be most noticeable, that will be of concern to residents					
NV.1.4 4	The 70/30 modal split assumed for future modelling seems to be based on the average annual modal split over the past five years, however, we would question whether or not this is representative of the 92 day summer period being modelled. The last published average summer modal split, in the 2013 Annual Monitoring Report, showed a 79/21 5 year average The 2020 summer modal split was 76/26. Future scenarios should be based on the average 92 day summer modal split, not the annual average and the baseline should be calculated on the same basis.		Buckingham shire County Council	1	The assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] has been undertaken based on a 23% easterly and 77% westerly modal split, which is the 92-day summer average modal split from 2010 to 2019 and represents the long-term 10-year average at the time of the 2019 baseline.	Yes
NV.1.4 5	We welcome the validation exercise described in Appendix 16.1		Buckingham shire County Council	1	Noted. Further validation has been undertaken and presented in Section 6 of Appendix 16.1 Noise and Vibration Information of the ES [TR020001/APP/5.02]	Yes
NV.1.4 6	We welcome the inclusion of additional metrics in the ES [Chapter 16 Noise and Vibration].		Buckingham shire	1	Noted. Supplementary noise metrics have been included in the noise assessment presented in	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
			County Council		Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01].	
NV.1.4 7	It should further be noted that strategic development to the East of Stevenage (with outline permission granted for up to 618 homes, primary and pre-school, up to 1 no. 80 bed care home and up to 50 assisted living homes (C2 use), neighbourhood hub comprising shops (up to 658 sqm of A1-A5 uses), community facilities (up to 400 sqm of D1 use), Travelling Showpeople site, public open space, landscaping, drainage infrastructure, all associated and ancillary development – 3/19/0118/OUT) is to be delivered and should therefore factor into any assessment of aircraft noise impact		East Herts District Council	1	Please refer to the response to Ref NV.1.33.	Yes
NV.1.4 8	The Borough is approximately 11km from the airport. It is noted that the noise impact zone study area does not extend to include the northern villages of Welwyn Hatfield. It is considered that the geographic scope of current technical assessments do not adequately assess impacts upon Welwyn Hatfield and we request that	Welwyn Hatfield Borough Council		1	The air noise study area (see Section 16.3 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]) has been defined using relevant guidance (Ref 36) and the relevant Lowest Observable Adverse Effect Levels (LOAELs) defined in aviation noise policy (Ref 30).	No

Ref	Comment	PC	LA	No PILs	Response	Change
	any future technical work take into account the administrative area of Welwyn Hatfield Borough so that we are fully able to determine the impact of proposals.					
NV.1.49	Noise and air quality –assessments should consider the impact on the Borough from the identified increase in activity, any resulting change in approaches/departure routes and holding patterns, and changes to operational hours.	Welwyn Hatfield Borough Council		1	<p>The air noise study area (see Section 16.3 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]) has been defined using relevant guidance (Ref 37) and the relevant Lowest Observable Adverse Effect Levels (LOAELs) defined in aviation noise policy (Ref 30).</p> <p>Air quality impacts from all related sources (road vehicles, aircraft and airport sources) have been assessed following best practices in Chapter 7 Air Quality of the ES [TR020001/APP/5.01].</p>	No
NV.1.50	Noise monitoring carried out in Breachwood Green in 2019 showed that even the newer, supposedly quieter, Neo aircraft were not in fact quieter over Breachwood Green. Also, measuring average noise hides the noisy spikes that can be more disruptive.	Kings Walden Parish Council		1	<p>Some variants of the A321Neo are slightly noisier than expected, but not more than older generation aircraft. This is taken into account in the assumptions for the noise assessments, which are discussed further in Section 16.4 of Chapter 16 Noise of the ES [TR020001/APP/5.01].</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Through discussions with LLAOL and airlines, it has become apparent that the poor performance is restricted to A321neo variants with particular engines flown by some airlines and variants with different engines flown by other airlines perform as would be expected from noise certification testing. Measured noise data was used to predict A321neo noise in the 2027 scenario; however, it is assumed that, by 2039, any issues with the A321neo performance would be resolved through fleet transition to equivalent aircraft that are no worse than the expected performance from noise certification testing. Consequently, A321neo predictions for the 2039 and 2043 scenarios were modelled based on the modelling methodology referenced from the ANP database (Ref 38).</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					Please also refer to the response to Ref NV.1.34.	
NV.1.5 1	The inhabitants of Pepperstock and adjacent parts of Slip End village estimate noise by the number of times a conversation has to be interrupted in the garden or the street by an aircraft passing overhead, which may be ten times in a half hour of batch takeoff during summer months. Such interruption qualifies as above SOAEL and calls in to question the statement (PEIR 2 16.9.46) "The precautionary UAEL is not predicted to be exceeded at any assessment location."	Slip End Parish Council		1	The Significant Observed Adverse Effect Level (SOAEL) and the Unacceptable Adverse Effect Level (UAEL) are separate thresholds and so an exceedance of the SOAEL is not the same as an exceedance of the UAEL. Justification for the setting of Significant Observed Adverse Effect Level (SOAEL) and Unacceptable Adverse Effect Level (UAEL) in line with guidance and policy is provided in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No
NV.1.5 2	[Referencing the PIER vol 2 para 16.6.1 c.] Runway modal split seems reasonable for long-term average modal split, but there does not appear to be any evidence presented to confirm this. There is a long-standing principle to use a 20-year average modal split.	Civil Aviation Authority			The assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] has been undertaken based on a 23% easterly and 77% westerly modal split, which is the 92-day summer average modal split from 2010 to 2019 and represents the long-term 10-year average at the time of the 2019 baseline. There is not sufficient data to be able to	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					determine a 20-year average, however, the use of a 10-year average is considered to be a robust approach.	
NV.1.5 3	[PIER vol 2 para 16.6.1 f.] No evidence presented to confirm that radar tracks in 2019 are comparable with 2017 tracks used for noise modelling. Although there have been no changes to the design of the airspace in that time that will affect the noise contours, at other airports other changes have occurred that were not due to changes in the published airspace design.	Civil Aviation Authority			The validation exercise has been updated using 2019 radar track data as described in Section 6 of Appendix 16.1 Noise and Vibration Information of the ES [TR020001/APP/5.02] .	Yes
NV.1.5 4	[PIER vol 2 Para 16.10.11] It is not clear what, if any, sensitivity analysis has been undertaken of how noise contour area might change with differing airspace usage (similar issue to sensitivity of differing runway modal split). Whilst the CAA recognises that detailed designs will not be available for some time, analysis of different runway modal splits and different departure route traffic distributions would give some indication as to how sensitive noise contour area is to these parameters.	Civil Aviation Authority			A sensitivity test has been undertaken to demonstrate that proposed future airspace changes are expected to be accommodated within the proposed Noise Envelope. The sensitivity test is presented in Section 12 of Appendix 16.1 Noise and Vibration Methodology and Data of the ES [TR020001/APP/5.02] and summarised in Section 16.9 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.5 5	[PIER vol 3] Tables 24 and 25 do not appear to entirely align with Table 23. Are the headings of Tables 24 and 25 reversed? (for example, approach noise data is shown for monitor locations LTN_MRK and LTN_FLM in Table 24, but these are not indicated as departure locations in Table 23). Similarly, departure noise data is shown in Table 25 for monitor locations LTN_KNS, LTN_CAD, and LTN_DGN, but these are identified as approach noise monitors in Table 23.) It would be helpful if these matters could be clarified.	Civil Aviation Authority			Noted. This has been corrected in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	Yes
NV.1.5 6	[PIER vol 3 Appendix 16.1]The noise assessment is based on average summer day noise exposure. However, significant aircraft noise data presented was collected outside the summer period. It would be helpful if LLAL could clarify why noise measurement data was not limited to the same summer period. It would be helpful if LLAL could also confirm if any data was rejected due to windspeed (as done for the baseline noise survey).	Civil Aviation Authority			Noise data for the 92-day summer period from permanent monitoring locations was used for validation. However, noise data from temporary monitoring locations was collected throughout the year. Where data was available to aid the validation process, it was considered appropriate to use this data to supplement the validation process regardless of the time of year it was collected, as the data represents recorded noise levels from individual aircraft	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>movements. No data was omitted due to windspeed as it was not shown to make a material difference to the validation. When validating the noise model, average weather conditions from each location were applied in the noise model so weather conditions during monitoring were accounted for. Please refer to Appendix 16.1 Noise and Vibration information of the ES [TR020001/APP/5.02] for more information.</p>	
NV.1.5 7	<p>[Draft Green Controlled Growth Proposals] As indicated by LLAL some airports dispense movements from night quota movement and noise limits, however, the dispensed aircraft are currently included in noise contours at those airports. Welcome further clarity on how dispensations would work with both daytime and night-time contour area limits. Not clear, for example, if flights delayed into the night period and subsequently dispenses, would be calculated as part of the daytime noise contour or not.</p>	Civil Aviation Authority			<p>For the purposes of measuring compliance against contour area noise limits set within the Noise Envelope and used in the GCG Framework [TR020001/APP/7.08], the noise contours will be calculated using scheduled movements as early and late running aircraft and dispensed movements are not directly in the Applicant's or Airport Operator's control.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.5 8	[PIER vol 3] Whilst the document does acknowledge that noise contours are affected by the impact of wind on runway usage (para 4.2.5) the proposals do not appear to make any allowance for this. It may be that Luton airport's noise contour areas are less sensitive to runway modal split than at other airports, but the effects of this need to be considered and potentially the limits defined around long-term runway modal split (e.g. a 20-year average runway use) to avoid atypical prevailing winds from causing a breach in a given year. With regard to the ranges proposed for the limits, there needs to be consistency between the limits proposed, the likely significant impacts identified, and the associated mitigation proposed, including the noise insulation scheme.	Civil Aviation Authority			The contour area noise limits set within the Noise Envelope and used in the GCG Framework [TR020001/APP/7.08] are set based on a 23% easterly and 77% westerly modal split, which is the 92-day summer average modal split from 2010 to 2019 and represents the long-term 10-year average at the time of the 2019 baseline. The same noise metric ($L_{Aeq,T}$) is used to define the noise limits, identify significant effects and identify eligibility for the Noise Insulation Schemes described in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	Yes
NV.1.5 9	[Assessment of the likely significant effects of construction and operational noise - Applicant notes that a number of secondary metrics will be reported in ES]. UKHSA welcomes the inclusion of these secondary metrics, and encourages the Applicant to incorporate them into	United Kingdom Health Security Agency		1	Please refer to the response to Ref NV.1.34.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	the assessment of likely significant effects and presentation of results (i.e., tables/maps). There is evidence that intermittency and event-based metrics can have additional predictive value of health effects in addition to long-term time-averaged metrics, or act as effect modifiers. This point is particularly relevant to some of the conclusions in the PEIR assessment, given the large number of increased aircraft movements as a result of the Scheme.					
NV.1.60	Whilst UKHSA welcomes reductions in noise exposure, the Applicant should acknowledge that such reductions are due to current and historical commitments for noise mitigation. For the purpose of this planning application, comparisons should be made with the relevant future year “Do Nothing”. On a similar argument UKHSA disagrees that the Scheme will address the first aim of NPSE by reducing the number of properties above SOAEL compared to a 2019 baseline (PIER 16.9.38).	United Kingdom Health Security Agency		1	As UKHSA suggests, the assessment of likely significant effects uses the change from the relevant future year “Do Minimum” scenario to the “Do Something” scenario. The Proposed Development meets the first aim of the NPSE (Ref 39) not only by reducing number of properties above SOAEL compared to the 2019 baseline but also by avoiding continuing exposure above SOAEL through the noise insulation scheme.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.6 1	<p>The Applicant uses the magnitude of noise level change (LAeq,T) and exceedance of noise level above a threshold (LOAEL/SOAEL) to determine significance of effects (Section 16.9.39 of PIER). UKHSA would encourage the Applicant to consider a wider range of factors for determining significance, particularly given the large size of the population effected (e.g., Tables 16.42 and 16.45 of PIER).</p> <p>Factors could include:</p> <ul style="list-style-type: none"> • Number of people exposed • Sensitivity of the population exposed • How close the noise level is to the LOAEL and SOAEL (since the health effects of noise are non-threshold based) • Secondary metrics (e.g., overflights, Lmax, number above) 	United Kingdom Health Security Agency		1	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref 30) and guidance from the Civil Aviation Authority (Ref 31) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics (including overflights, Lmax and Numbers above) have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The number of people exposed is considered and presented as part of the assessment. For the purposes of assessment, the population exposed is assumed to be sensitive to noise. The noise change criteria is dependent on the Do-Something noise levels, so changes in noise that bring a receptor above LOAEL or SOAEL are considered as impacts. This means receptors below, but close to, the LOAEL and SOAEL are more likely to be identifying as experiencing</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					impacts which could lead to significant effects depending upon the assessment criteria.	
NV.1.6 2	UKHSA does not agree with statements suggesting that the noise assessment is a “worst case” (e.g. PIER 16.15.4). There are many uncertainties and unknowns, such as how quickly the transition to quieter aircrafts will take place, and whether new scientific evidence will show that health effects occur at lower levels than assumed in the PEIR.	United Kingdom Health Security Agency		1	In line with Planning Inspectorate Advice Note Nine: Rochdale Envelope (Ref 40) the assessment is undertaken based on a reasonable worst case. The assumptions in the noise and vibration assessment that led to the assessment of a reasonable worst case are outlined in Section 16.6 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . Uncertainties related to the uptake of new and next-generation aircraft and updates to health evidence are dealt with through sensitivity tests presented in Chapter 16 Noise and Vibration and Chapter 13 Health and Community of the ES [TR020001/APP/5.01] .	No
NV.1.6 3	For aircraft noise, Applicant states that the LOAELs and SOAELs are defined in ‘national policy’ (LOAEL) or ‘following approaches adopted in recent planning applications for UK	United Kingdom Health Security Agency		1	UKHSA’s recommendation has been actioned and the LOAELs and SOAELs are presented in terms of health outcomes in Chapter 13 Health and	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	airports' (SOAEL) (PIER Section 16.5.38, Table 4 in Appendix 16.1). UKHSA recommends that the Applicant translates its choice of LOAEL and SOAEL in health terms, in line with the vision and aims of the NPSE (e.g. % people annoyed/ highly sleep disturbed; % increased risk of cardiovascular disease). For example, both the synthesised evidence in the WHO 2018 ENG (and associated systematic reviews) and the evidence from SONA 2014 show that adverse population health effects are observed below the Applicant's choice for a LOAEL. Certain extracts from policy and guidance, such as those in Table 16.22 are presented out of context and can be misleading.				Community of the ES [TR020001/APP/5.01].	
NV.1.6 4	For road-transport noise UKHSA also recommends that the chosen LOAEL and SOAEL are expressed in health terms.	United Kingdom Health Security Agency		1		Yes
NV.1.6 5	UKHSA encourages the Applicant to provide further clarity on why it considered appropriate to apply the LOAELs/SOAELs for air noise to ground noise (PIER Table 16.11),	United Kingdom Health Security Agency		1	Although air and ground noise both originate from aircraft, it is recognised that the nature of noise is different. There is no specific guidance on how ground noise should be assessed;	No

Ref	Comment	PC	LA	No PILs	Response	Change
	given that the two sources of noise can be distinctly different				however, there is considered to be a sufficient link between air and ground noise due to the emissions originating from the same source. Consequently, in the absence of any specific guidance for ground noise, the LOAEL and SOAEL for air noise are considered applicable to ground noise.	
NV.1.6 6	The Applicant should provide further clarity on their methodology for defining significance of construction noise effects in [PIER] Section 16.5.20 to 21. It is unclear if significance was defined solely based on exceedance of LOAEL and SOAEL thresholds or if a change in noise level was additionally taken into account (PIER Table 16.9, Section 16.5.20-21).	United Kingdom Health Security Agency		1	Although a significant effect due to construction activities may be determined through an assessment based on exceedances of the defined SOAELs for construction noise, consideration of the significance of the effect for temporary construction activities exceeding the LOAEL is undertaken through qualitative consideration of the following: duration of activities; frequency of events; number of receptors; and sensitivity of receptors. Please refer to Section 16.5 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] for more information on the methodology	No

Ref	Comment	PC	LA	No PILs	Response	Change
					for defining the significance of construction noise effects.	
NV.1.6 7	Applicant is encouraged to reference any scientific evidence underpinning the choices in [PIER] Table 16.12. Whilst UKHSA agrees in principle that significance should be based on both absolute levels and the magnitude of change, we have concerns about some of the chosen criteria. For example, Table 16.12 suggests that households exposed to levels of noise exceeding the SOAEL as a result of the Scheme can experience an increase of nearly 2dB and the impact would still be classified as not significant. We have similar concerns for those who will be exposed to levels very close to, but not exceeding the chosen SOAEL. The population above the Applicant's choice for a SOAEL is exposed to high levels of noise. An increase in noise exposure as a result of the Scheme, however small, risks "locking-in" this population to high noise exposure for many years to come. These receptors would benefit	United Kingdom Health Security Agency		1	The change criteria in Table 16.14 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] (equivalent to Table 16.12 in the PEIR) are used to identify likely significant effects in EIA terms due to noise change. As there is no published guidance for identifying the significance of effect due to changes in air noise, the criteria are based upon the Institute of Environmental Management and Assessment's (IEMA) 'Guidelines for Environmental Noise Impact', Planning Practice Guidance Noise (PPGN) and professional judgement. UKHSA's concern about the 2dB change criteria above SOAEL that was used in the PEIR has been noted, and the change criteria for the assessment in the ES has been updated to identify significant effects for changes of 1dB or	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	most from improvement to health and quality of life through the effective management and control of noise, in line with the third aim of Airports NPS para. 5.68				more above the SOAEL (a more conservative approach). However, significant effects on health and quality of life are identified based on exceedance of the SOAEL (regardless of the magnitude of change) and are avoided through the Noise Insulation Schemes set out in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	
NV.1.6 8	With regard to road-traffic noise, Applicant states that they followed DMRB guidance (PIER Section 16.5.43). However long-term changes of road-traffic noise do not seem to have been taken into account (Section 16.5.43 – 45).	United Kingdom Health Security Agency		1	In line with DMRB, long-term changes of surface access noise (from 2027 without the Proposed Development to 2043 with the Proposed Development) have been assessed and are presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	Yes
NV.1.6 9	[Concerning PIER] UKHSA would welcome further clarity on how the study area was defined, and in particular which scenario was used for this purpose. A study area defined by the Applicant's choice for the LOAEL (51dB LAeq,16hr) would not	United Kingdom Health Security Agency		1	Justification for how study areas have been derived for each noise source is presented in Section 16.3 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The assessment of noise (amongst other factors) on the tranquillity of	No

Ref	Comment	PC	LA	No PILs	Response	Change
	capture areas that are valued for their tranquillity.				landscape receptors prized for their tranquillity (namely the Chilterns AONB) considers a wider study area of areas overflowed by aircraft up to 7,000ft.	
NV.1.70	UKHSA expects a more detailed analysis of non-residential receptors, including careful consideration of sensitivity and vulnerability on a case-by-case basis.	United Kingdom Health Security Agency		1	A detailed assessment of non-residential receptors is provided in Section 16.9 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	Yes
NV.1.71	UKHSA would welcome information showing the number of people exposed to a decrease/increase in noise (split into dB increments), in addition to number of overflights or aircraft noise events. Whilst there is ongoing debate on whether a change effect is primarily driven by an announcement of change or by the change itself the Applicant is encouraged to include in the final ES a consideration of the likely implications of changes in exposure on the annoyance assessment.	United Kingdom Health Security Agency		1	The noise assessment now presents and considers the number of people exposed to changes in noise in accordance with the change criteria defined for the assessment. This is presented in Section 16.9 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . Overflights are presented in a series of figures representing each scenario and assessment year (refer to Section 16.9 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]) and information on changes in overflights is presented in Section 7.6 of Appendix 16.1 Noise and Vibration Information of the ES	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					[TR020001/APP/5.02] . A consideration of the likely implications of changes in exposure on annoyance (and other health outcomes) in terms of Disability Adjusted Life Years is presented in Chapter 13 Health and Community of the ES [TR020001/APP/5.01] .	
NV.1.7 2	[PIER] UKHSA expects further consideration of the concurrence of different noise sources, their duration, additive effects, and whether the sources affect the same or different façades. There should also be stronger cross-referencing to Chapter 16. UKHSA encourages the Applicant to consider quantitative methods that could be used to inform such an assessment.	United Kingdom Health Security Agency		1	The potential for combined noise effects due to exposure to multiple sources of noise has been considered qualitatively as there is no reliable means of quantitatively assessing the overall noise effects resulting from combined exposure to multiple noise sources. This qualitative assessment is presented in Section 16.9 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . Further cross-referencing between Chapter 13 Health and Community and Chapter 16 Noise and Vibration has been added to the ES [TR020001/APP/5.01] .	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.7 3	[PIER Section 3.3.2 in Appendix 16.1] states that "... UK policy will be underpinned with recent UK specific evidence in the Civil Aviation Authorities Survey of Noise Attitudes (SoNA) (Ref. 30)). Consequently, dose-response relationship in the new WHO Guidelines is not currently considered directly applicable to the assessment." As UKHSA mentioned in its scoping response, published data from SoNA are only relevant to annoyance. UKHSA recommends that the Applicant carefully considers the much broader evidence in the WHO ENG Guidelines (2018) (and the accompanying systematic reviews) when assessing other health outcomes, including sleep disturbance and cardiovascular health outcomes.	United Kingdom Health Security Agency		1	Although the exposure-response relationship in the new WHO Guidelines is not currently adopted in UK policy, sensitivity testing using the relevant updated relationships in the WHO guidelines has been undertaken and is presented in Chapter 13 Health and Community of the ES [TR020001/APP/5.01].	Yes
NV.1.7 4	In [PIER] Section 16.5.15 applicant states that that the SOAEL is 'the average response level above which, as an average response, significant adverse effects on health and quality of life occur'. The Applicant should clarify which health outcomes it is referring to for an 'average response'. The epidemiological evidence shows	United Kingdom Health Security Agency		1	The terminology of "average response" is taken from Government noise policy (Planning Practice Guidance - Noise) (Ref 41). No further information is provided on the definition of "average response" and it is not considered appropriate for the Applicant to	No

Ref	Comment	PC	LA	No PILs	Response	Change
	that the magnitude of effects and the shape of the exposure response relationships between noise exposure and ill health varies considerably between health outcomes.				attempt to further define policy terms that are not defined in the policies themselves.	
NV.1.7 5	The Applicant should clarify that, with reference to the WHO Environmental Noise Guidelines for the European Region, 2018, the Aviation Strategy does not state that “UK policy will be underpinned with recent UK specific evidence in the Civil Aviation Authorities Survey of Noise Attitudes” (PEIR Table 16.4). The Aviation Strategy states that: “The government is considering the recent new environmental noise guidelines for the European region published by the WHO. It agrees with the ambition to reduce noise and to minimise adverse health effects, but it wants policy to be underpinned by the most robust evidence on these effects, including the total cost of action and recent UK specific evidence which the WHO report did not assess.”	United Kingdom Health Security Agency		1	Noted and corrected in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01].	Yes
NV.1.7 6	The Applicant should also clarify that the WHO ENG2018 supersedes the WHO Guidelines 1999 and 2009 for	United Kingdom Health		1	Noted and clarified in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], though the WHO Environmental Noise	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	assessments of transport noise based on external noise levels.	Security Agency			Guidelines (Ref 42) state that they “complement the NNG from 2019”. The NNG in the quote is referring to the Night Noise Guidelines (Ref 43).	
NV.1.7 7	In the first row of [PIER] Table 16.49 relating to an increase in heatwaves, and opening windows more often, the Applicant states that: “The noise assessment criteria assume windows are open when internal noise levels are considered. Consequently, there is no further impact on noise effects arising from the ICCI.” The Applicant should clarify this statement. The Applicant’s choice for a SOAEL appears to be based on legal precedent rather than recent epidemiological and behavioural scientific evidence related to external and internal noise levels. Furthermore, the Applicant should explain the likely implication of more frequent heatwaves on its main mitigation measure of providing noise insulation.	United Kingdom Health Security Agency		1	The assessment of in-combination climate change effects in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] has been updated to include the implications for noise insulation.	Yes
NV.1.7 8	Regarding [PIER] Tables 16.23/16.24/16.25 and the assessment of construction noise effects, it is not clear why some	United Kingdom Health		1	The equivalent tables in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] have been rearranged to clarify that	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	receptors with an LAeq,10h value of 65 dB or more are classified as being below LOAEL. The Applicant should also clarify whether evening and night-time construction works will be taken into account in the ES assessment.	Security Agency			exposure equal to, or above, 65dB is identified as exposure above the LOAEL. The potential for out of hours work has been assessed qualitatively and are addressed in the CoCP (provided as Appendix 4.2 of the ES [TR020001/APP/5.02]) through the section 61 process.	
NV.1.79	UKHSA was unable to find consideration within Chapter 16 (Noise and Vibration) in the PEIR on the impacts of noise on private amenity spaces, including gardens, balconies, and communal recreation areas (found in residential developments, for example). UKHSA expects consideration of the potential impact resulting from increased noise exposure in private amenity spaces.	United Kingdom Health Security Agency		1	The assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] has been updated to clarify that the identified noise effects on residential receptors represents the effects on people, primarily where they live in terms of individual households and on a wider community basis. This includes any shared community open areas (e.g. parks) as well as private open space (e.g. gardens).	Yes
NV.1.80	The Applicant should also clarify <ul style="list-style-type: none"> • Why night-time noise exposure contours and future noise awakening assessments do not appear to be taken into account in informing noise 	United Kingdom Health Security Agency		1	The Noise Insulation Scheme has been updated to include eligibility for the full cost of insulation of residential properties within the night-time air noise SOAEL contour. Details are provided in	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>insulation Tiers (PIER Section 16.8.7);</p> <ul style="list-style-type: none"> • How it will ensure that inequalities would not arise due to varying abilities to pay for unmet costs for noise insulation schemes in Tiers 2-4 (Section 7.1 in Draft Compensation and Policy Measures). 				<p>the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p> <p>The Equality Impact Assessment [TR020001/APP/7.11] considers the potential equalities impacts of the Proposed Development which includes the Noise Insulation Schemes.</p>	
NV.1.8 1	<p>With reference to [PIER] Table 16.48, the Applicant should clarify:</p> <ul style="list-style-type: none"> • whether the night-time quota period includes the full eight-hour night time period from 2300-0700 • why daytime noise limits are characterised by the 54 dB LAeq,16hr contour, rather than the 51 dB contour • why night-time noise limits are characterised by the 48 dB LAeq,8hr contour, rather than the 45 dB contour • what consideration will be given to future population growth within these contours. 	United Kingdom Health Security Agency		1	<p>The night-time quota period is set by the Department for Transport from 23:30 to 06:00. The choice of which contour band is used to set the Noise Envelope limits was informed by recommendations from the Noise Envelope Design Group (NEDG) (see GCG Explanatory Note [TR020001/APP/7.07] for details). Similarly, the limits are based on contour area rather than population based on recommendations from the NEDG as it is recognised that population within contours is not within the airport's control.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					However, the population within contour bands will be reported.	
NV.1.8 2	[PIER vol 3 Appendix 16.1] Having adjusted AEDT for the four of the aircraft types, it is not clear why the A321neo was not adjusted and treated differently.	Civil Aviation Authority			The A321neo was not adjusted in the PEIR noise model as it was based on 2017 radar track data which did not contain any A321neo aircraft. The validation for the ES noise model, described in detail in Section 6 of Appendix 16.1 Noise and Vibration Information of the ES [TR020001/APP/5.01] , has been updated to be based on 2019 radar track data and the flight profiles for the A321neo have been adjusted based on the radar track data.	Yes
NV.1.8 3	PEIR documentation has references throughout that “the next generation of aircraft” ... is likely to lead to noise reductions (e.g. PEIR Chapter 16 paragraph 16.6.6 and Section 16.9). The Applicant should consider the evidence that the contrary could happen, i.e. that new propulsion methods could lead to increased noise emissions, or make noise more annoying for a given level due to a	United Kingdom Health Security Agency		1	As a reasonable worst-case, the assumption in the core assessment scenario is that next-generation aircraft are no quieter than the new-generation aircraft that they will replace. A sensitivity test is provided to demonstrate how noise levels could be reduced in the future if noise levels of next-generation aircraft continue to reduce. Continued	No

Ref	Comment	PC	LA	No PILs	Response	Change
	change in the sound spectrum. Increased noise emissions may also occur if Net Zero commitments require that reducing energy use takes precedence over noise mitigation. UKHSA recommends additional sensitivity testing considering such scenarios in the ES.				reduction in noise levels is still considered an appropriate assumption for a sensitivity test based on the latest reviews from ICAO published in 2022 (Ref 44). However, since the Noise Envelope limits are based on the assumption that next-generation aircraft are no quieter than new-generation, if the next-generation aircraft do in fact result in increased noise emissions, then the legally binding limits will mean that growth would be constrained, or an alternative mitigation measure would need to be employed to offset the increase in noise emissions. As this effect would be controlled by the Noise Envelope a sensitivity test is not required.	
Baseline						
NV.1.8 4	Comments have already been made in relation to the incomplete baseline noise surveys, used as a basis for establishing a baseline for predicting future noise contours. The current planning condition 10, relating to the day and night-time contour limits (in		North Herts DC	1	Further detailed information on the derivation of the assessment baseline has been provided in Chapter 16 of the ES [TR020001/APP/5.01] . The baseline for predicting future noise contours is not derived from	No

Ref	Comment	PC	LA	No PILs	Response	Change
	terms of LAeq,16hour and LAeq,8hour, respectively) was exceeded for both day and night in 2019. The night-time noise contour limit was also exceeded in 2017 and 2018.				baseline noise surveys. Rather it is modelled using a recognised aircraft noise model which has been validated using extensive noise monitoring terminal measurements covering the 92-day summer period. Details of the noise model validation process are provided in Section 6 of Appendix 16.1 Noise and Vibration Methodology and Data of the ES [TR020001/APP/5.02] .	
NV.1.8 5	Noise contour plots will be used for future assessment of annoyance to health detriment and claims to Local Authorities for payments in relation to noise insulation. Therefore, the establishment of comprehensive baseline data is vital to the reliability of future contour modelling. As contour limits were exceeded in 2019, there is a question whether 2019 can be used as an acceptable baseline year. Overall, in terms of noise assessment there is a heavy reliance on the results of noise contour modelling, which currently use 2019 year as a baseline where contour		North Herts DC	1	With reference to The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) (Ref 29) (which refers to the baseline scenario as “a description of the relevant aspects of the current state of the environment”), it is considered appropriate to model the noise impact that occurred in 2019 using actual air traffic movement data to represent the ‘current baseline’. However, in response to the 2022 statutory consultation feedback, a sensitivity test has been	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	limits were exceeded, this must be addressed.				undertaken using a '2019 compliant' baseline modelled using a theoretical 2019 fleet that would have been compliant with the current consented short-term noise limit. This sensitivity test is presented in Section 12 of Appendix 16.1 of the ES [TR020001/APP/5.02] and summarised in Section 16.9 of Chapter 16 of the ES [TR020001/APP/5.01].	
NV.1.8 6	It is of concern the baseline noise measurements have not all been conducted within recommended periods.		North Herts DC	1	The aircraft noise model validation has been updated using extensive noise monitoring terminal measurements covering the 2019 92-day summer period reflected in Government aviation noise guidance (Ref 45). Details of the noise model validation process are provided in Section 6 of Appendix 16.1 of the ES [TR020001/APP/5.02].	Yes
NV.1.8 7	NHC asks LR to: - Undertake to take all baseline noise measurements for the EIA within recommended periods. - Confirm that the baseline used for contour modelling makes allowance for any exceedance of contour limits.		North Herts DC	1	The aircraft noise model validation has been updated using extensive noise monitoring terminal measurements covering the 2019 92-day summer period reflected in Government aviation noise guidance (Ref 46). Details	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>of the noise model validation process are provided in Section 6 of Appendix 16.1 of the ES [TR020001/APP/5.02].</p> <p>In response to statutory 2022 consultation feedback, a sensitivity test has been undertaken using a '2019 compliant' baseline modelled using a theoretical 2019 fleet that would have been compliant with the current consented short-term noise limit. This sensitivity test is presented in Section 12 of Appendix 16.1 of the ES [TR020001/APP/5.02] and summarised in Section 16.9 of Chapter 16 of the ES [TR020001/APP/5.01]</p>	
NV.1.8 8	<p>NHC asks LR to:</p> <ul style="list-style-type: none"> - Consider adding baseline noise monitoring sites to represent potential sensitive sites, such as schools, care homes, hospitals etc., including in areas that may be negatively affected by changes in future flight paths. - Continue to monitor noise levels in the future in order to validate (or adjust and recalibrate) noise contour models and monitoring sites. 		North Herts DC	1	<p>A commitment has been made within the Aircraft Noise Monitoring Plan of the GCG Framework [TR020001/APP/7.08] to maintain and improve, as needed for the expanded airport, the array of permanent and temporary aircraft noise monitoring stations currently in place at the time of the</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					application for development consent. Data from the noise monitoring terminals will be used to review, and update as required, the validation of the aircraft noise model as part of the five-year GCG review cycle.	
NV.1.89	The anticipated trajectory for passenger numbers for the 2012 application to expand London Luton Airport (LBC ref. 12/01400/FUL) was 18 million passengers per annum up to 2028 but due to unprecedented levels of growth in passenger numbers day and night noise levels breached Condition 10 in 2019. The noise contour baseline used to inform the PEIR has been set for 2019 but this is misleading, and the baseline should be from the existing permissible noise levels i.e. the existing contours, a point that has been raised by the CBC Pollution Officer and WSP.		Central Bedfordshire Council	1	Please refer to the response to Ref NV.1.85.	Yes
NV.1.90	A more fundamental issue underlies the entire consultation. The 2019 consultation used the 2017 data set as a baseline. The 2022 consultation uses 2019 data. 2019 represents the peak of flight numbers and passenger	Slip End Parish Council		1	Please refer to the response to Ref NV.1.85.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	throughput pre-covid, and using this data as a baseline normalises it (e.g. PEIR 2 16.5.4 states that 2019 was the last year of 'normal' operations and concedes that noise limits were breached in both day and night operations) - a 'new normal' which, by definition, becomes acceptable and/or desirable simply because it is the status quo.					
NV.1.9 1	There is no consideration here of the factors which led to this exceptional growth, which far exceeded the original estimates, or whether 2019 baseline is appropriate, particularly from an environmental viewpoint, as in 16.5.4 above. Thus, with an 'acceptable' scenario in place it has merely become a matter of ensuring that future scenarios remain comparable to the 2019 level to claim green kudos. For example, it is remarkable that the future Noise Envelope scenarios for 2027, 2039 and 2043 (PEIR 4 figures 16.7 to 16.24) look remarkably similar to each other, and to the 2019 scenario, even though aircraft numbers will have doubled by the end of the sequence.	Slip End Parish Council		1	Please refer to the response to Ref NV.1.85. The area of noise contour is dependent on the number of aircraft movements and the type of aircraft. As the Proposed Development progresses through time, the number of movements increases but the proportion of quieter new-generation aircraft also increases. By 2043, the summer average aircraft numbers are forecast to increase by approximately 50% (not double) by 2043 compared to 2019 numbers.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.9 2	Doubling the number of flights, with a takeoff every 90 seconds, will double the problem by 2043, no matter how much Fig 16.24 tries to persuade us otherwise.	Slip End Parish Council		1	By 2043, the summer average aircraft numbers are forecast to increase by approximately 50% (not double) by 2043 compared to 2019 numbers.	No
NV.1.9 3	UKHSA disagrees with the Applicant's approach of comparing future noise levels with a 2019 baseline. A 2019 baseline does not reflect reductions in noise due to aircraft fleet modernisation, which would take place irrespective of the Scheme. In UKHSA's view impacts because of the Scheme should be evaluated against the relevant "Do Nothing" future year scenario.	United Kingdom Health Security Agency		1	As UKHSA suggests, the assessment of likely significant effects uses the change from the relevant future year "Do Minimum" scenario to the "Do Something" scenario.	No
NV.1.9 4	The forecasted noise levels prepared by the applicant are flawed. They rely on an over-optimistic assessment of future demand for air travel, at a time when there are significant uncertainties around future demand and they do not assess other alternatives to growth, or to growth at this specific location in the light of the government's 'levelling up' agenda.		St Albans City and District Council		The demand forecasts are based on projections of future economic growth in the UK (refer to the Need Case [TR020001/APP/7.04] for more information) and taking into account the Government's decarbonisation agenda (Ref 47). Uncertainties are reflected in the faster and slower growth cases. Airports are encouraged by Government to make best use of existing runway capacity to meet the expectation of higher demand	No

Ref	Comment	PC	LA	No PILs	Response	Change
					for air travel in future (Ref 48). The Government does not seek to constrain this growth. Luton is an area identified as being in need of levelling up so the proposals would directly contribute to the 'levelling up' agenda.	
NV.1.9 5	[Baseline sound surveys] UKHSA recommends long-term noise monitoring in multiple locations for a period greater than seven days. This information should be used to test the robustness of any conversions between noise metrics (e.g. converting from LA10,18hr to LAeq,16hr, Lnight and Lden), and to test whether the proportionate traffic flow volumes within the study area between daytime and night-time can be considered as typical.	United Kingdom Health Security Agency		1	As the principal effects from the scheme are related to air noise, the long-term baseline sound monitoring has focused on data collection relevant to the air noise study area. However, short term baseline surveys have been used to validate the surface access noise model. Whilst the purpose of these surveys was not intended to test the robustness of conversions between noise metrics, the results show a good agreement with calculated LAeq values even on low flow roads in the Tea Green area where the calculated conversion from LA10 to LAeq may be less robust. As such, it is considered that calculated daytime LAeq,16h values relating to the roads in the traffic model are reliable. In line with DMRB	No

Ref	Comment	PC	LA	No PILs	Response	Change
					guidance, in the absence of hourly traffic flows throughout the night, night-time noise levels are calculated using TRL 'Method 3' (Ref 49), which is based on the typical diurnal pattern of traffic flows in the UK and provides reliable results for most UK roads.	
NV.1.9 6	[PIER vol 2 Para 16.6.1 h.] It is not clear why the noise modelling was adjusted for other aircraft to match measurements, but not for the A321neo. We would be grateful for clarification as to why the measured performance of the A321neo was not used as a baseline. We would also be grateful for clarification as to the basis for the assumption that the A321 neo's performance will be resolved by 2039.	Civil Aviation Authority			Please refer to the responses to Ref NV.1.50 and NV.1.82.	Yes
Noise mitigation and management						
NV.1.9 7	It is important that the limits and thresholds set out in the Noise Envelope are regularly reviewed particularly in relation to the potential benefits that could accrue from airspace change		Buckinghamshire County Council	1	The Noise Envelope contains a mechanism for the noise contour area Limit to be regularly reviewed reduced in future years (beyond the 2030s) if and when quieter 'next generation' aircraft enter the fleet, or an airspace	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					change is implemented that would enable lower noise levels to be achieved than that forecast in the reasonable worst-case assessment reported in the ES. Please see the GCG Explanatory Note [TR020001/APP/7.07] for details.	
NV.1.9 8	We would encourage Luton to investigate the possible benefits of adopting NADP1/NADP2 departure procedures. They should only become operational if there is a demonstrable noise benefit or the noise impact is neutral but there are efficiency benefits.		Buckingham shire County Council	1	Noted. There is a proposal by the Airport Operator, London Luton Airport Operations Limited (LLAOL), within their Noise Action Plan to undertake a review of Noise Abatement Departure Procedures (NADP) used at London Luton Airport to evaluate their effectiveness and work with their airline partners to identify and implement improvements. This is part of LLAOL's ongoing noise management and is not a DCO commitment. The noise assessment of the Proposed Development, as described in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , assumes no benefit from new departure procedures as a reasonable worst case.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.99	We welcome Luton's commitment to encourage the delay in deployment of landing gear if safety requirements allow		Buckinghamshire County Council	1	Noted. This is a proposal by the Airport Operator, London Luton Airport Operations Limited (LLAOL), within their Noise Action Plan and is not a DCO commitment. The noise assessment of the Proposed Development, as described in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , assumes no benefit from delayed landing gear as a reasonable worst case.	No
NV.1.100	Although no predicted noise levels for Huntingdonshire area have been provided, the flight height agreement is the best practical way of reducing the impact of noise.		Huntingdonshire District Council	1	Noted.	No
NV.1.101	The Council welcomes all of the commitments offered in relation to noise mitigation, particularly in maintaining the current limit on night flights, incentivising the adoption of quieter aircraft and reviewing the extent of the Noise Insulation Scheme.		Stevenage Borough Council	1	Noted.	No
NV.1.102	The Council will expect to see robust evidence and assessment of how these objectives will be achieved and also how they will be monitored and		Stevenage Borough Council	1	Details of how the limits in the Noise Envelope (which are the primary noise control mechanism) will be achieved, monitored and	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	enforced in the longer term. We note there is still no mention in the consultation document of noise violation limits and conditions that might be placed on the development to minimise noise impacts.				enforced are provided in the GCG Explanatory Note [TR020001/APP/7.07] .	
NV.1.1 03	Whilst UKHSA acknowledges that properly designed, installed, maintained and operated noise insulation measures are effective at reducing internal noise levels, there is insufficient good quality evidence which demonstrates that noise insulation is effective at reducing adverse psychological and physiological health outcomes . The Applicant should also acknowledge that any benefits associated with noise insulation relate to indoor noise only (with windows closed) and would not provide mitigation for noise in outdoor private and community amenity spaces.	United Kingdom Health Security Agency		1	Noted. It is acknowledged in Chapter 16 Noise and Vibration [TR020001/APP/5.01] of the ES that insulation provides a benefit to indoor noise only. The Applicant is not aware of evidence which demonstrates that noise insulation is effective at reducing adverse psychological and physiological health outcomes, however the approach of avoiding significant noise effects from noise through insulation has been used for many major infrastructure projects (Ref 50).	No
NV.1.1 04	With reference to the Noise Envelope, [PIER] paragraph 16.9.38 states that “The Noise Envelope is being designed to protect communities whilst enabling the airport to operate efficiently and allow it to grow in accordance with the	United Kingdom Health Security Agency		1	The mechanism through which the Noise Envelope will share the noise benefits of future technology between the industry and communities is described in detail in the GCG Explanatory Note [TR020001/APP/7.07] .	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	limits defined by the Noise Envelope.” The Applicant should acknowledge that these are very challenging and potentially contradictory requirements, and UKHSA is not aware of any successful implementation to date of a noise envelope in the UK that has achieved both these aims.					
NV.1.1 05	With regard to mitigation measures for ground and road traffic noise (which are still yet to be determined, [PIER] Section 16.10.16), UKHSA expects consideration of a broad range of measures, such as urban planning, traffic management, low-noise road surfaces, acoustic barriers, quiet facades and noise insulation schemes. Consideration should also be given to the emerging evidence regarding cross-modal perceptual interaction. For example evidence suggests that individuals may over-value the sound reduction provided by a noise barrier if it also provides visual screening of the sound source, and particularly if it includes trees and vegetation	United Kingdom Health Security Agency		1	Mitigation measures in the context of sustainable development have been considered for ground and road traffic noise. For example, existing airport perimeter barriers have been retained and reused and the Proposed Development is committed to improving accessibility to the airport, particularly by public transport, which will reduce surface access noise levels. Further information on the sustainable transport strategy is detailed in the Surface Access Strategy [TR020001/APP/7.12] and Framework Travel Plan [TR020001/APP/7.13] .	No
Noise monitoring						

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.1 06	We would encourage Luton to deploy further fixed noise monitors beyond the 6.5km start of roll distance in line with CAP 1691.		Buckingham shire County Council	1	A commitment has been made within the Noise Monitoring Plan of the GCG Framework [TR020001/APP/7.08] to maintain and improve, as needed for the expanded airport, the array of permanent and temporary aircraft noise monitoring stations currently in place at the time of the submission of the application for development consent. In line with CAA guidance (CAP 1691, Ref 51) and the recommendations of the NEDG, the airport operator will agree with the Noise Technical Panel the locations for additional permanent noise monitors on departure routes located at 2.5km and beyond 6.5 km from start-of-roll.	Yes
NV.1.1 07	Your proposals discuss fixed noise monitors being in place in certain villages after expansion. We feel a fixed noise monitor needs to be in place in Breachwood Green NOW, for Luton Rising to fully understand the impact of noise pollution that the village already experiences.	Kings Walden Parish Council		1	Please refer to the response to Ref NV.1.106.	No

Ref	Comment	PC	LA	No PILs	Response	Change
NV.1.1 08	While the PEIR states in Section 16.10.2 that ‘No significant construction noise or vibration effects have been identified. Consequently, no additional mitigation measures are recommended.’, UKHSA recommends that the Applicant continues to monitor the situation as construction activities take place and implement mitigation when and as needed to mitigate potential significant adverse impacts on human health.	United Kingdom Health Security Agency		1	Mitigation measures secured through the CoCP, including a commitment to monitor noise (provided as Appendix 4.2 of the ES [TR020001/APP/5.02]) are considered to represent appropriate best practicable means and will ensure that adverse effects from construction noise is minimised at all times throughout the construction programme.	No
NV.1.1 09	UKHSA welcomes the noise insulation scheme (NIS) “package of options” including acoustic glazing applied to windows... (Section 7.2 in Draft Compensation and Policy Measures). It is additionally very important to ascertain that such interventions perform as intended when installed as a system, mitigating risks from noise, overheating and poor indoor air quality. The best way to verify this is to monitor and assess the effectiveness of any noise insulation schemes in actual dwellings, such that occupant behaviours are factored in. UKHSA encourages the Applicant to put	United Kingdom Health Security Agency		1	The EIA Regulations (Ref 29) include a test of ‘proportionality’ for monitoring. Due to the complexity and cost of obtaining accurate health data for the study population, and of attributing any changes in health outcomes to the project, monitoring of health outcomes of noise insulation schemes is not proposed. Noise insulation schemes are common practice for mitigating aircraft noise and are effective at reducing indoor noise levels.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	forward proposals to monitor and assess the effectiveness of its NIS for protecting and improving health and quality of life, and not simply for the reduction of internal noise levels.					
NV.1.1 10	UKHSA encourages the Applicant to also consider opportunities for monitoring potential health and quality of life impacts on neighbouring communities.	United Kingdom Health Security Agency		1		No
NV.1.1 11	UKHSA also recommends that the Applicant considers the feasibility of carrying out monitoring of health outcomes attributable to noise. Guidance on best practices can be found in Brown and van Kamp 2017.	United Kingdom Health Security Agency		1		No
NV.1.1 12	The number of people experiencing an increase in road-traffic noise is unknown in the PEIR, and consideration of the feasibility of monitoring noise and health impacts of road-traffic noise is also recommended by UKHSA.	United Kingdom Health Security Agency		1	A detailed assessment of surface access noise including reporting of the number of people experiencing changes in road traffic noise is presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.02] . Please also refer to the response to Ref NV.1.110.	No

Ref	Comment	PC	LA	No PILs	Response	Change
Noise Policy						
NV.1.1 13	The application documentation does also indicate a substantial increase in the number of people in the 'adversely affected' noise contours (as opposed to the 'significantly adversely affected' levels) and also that there will be an increase in noise levels for existing properties that already experience some adverse noise effects (by 1-3dB). The proposal does not therefore comply with paragraph 185 of the NPPF or Policy LLP6 of the Luton Local Plan regarding noise impacts.		St Albans City and District Council		<p>The means through which the Proposed Development meets the aims of policy are presented in Table 16.2 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.02].</p> <p>The noise and vibration assessment in Chapter 16 of the ES [TR020001/APP/5.02] demonstrates how the Proposed Development will meet the aims of the National Planning Policy Framework (NPPF) and Policy LLP6 in the Luton Local Plan by mitigating and reducing to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life. No unacceptable adverse effects have been identified. An assessment of tranquillity in accordance with NPPF paragraph 185b has been undertaken and is presented in Chapter 16 Noise</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					and Vibration of the ES [TR020001/APP/5.02].	
NV.1.1 14	Government policy also acknowledges that noise contours are, in any event, not the only relevant measure of noise. They are based on an 'average' noise level being experienced and not on the number of individual noise events and the frequency and pattern of noise occurrence in itself. Whilst the applicants modelling indicates that properties in St Albans District would not fall within the noise contours of those properties most significantly affected by aircraft noise, it nevertheless remains a fact that there will be a significant increase in the number of flights to and from the airport and this will have a significant demonstrable impact on the quality of life of those residents. Whilst they may not experience average noise levels as shown on noise contour plans, residents will still be disturbed by the frequency of noise events, and the 'quiet time' between aircraft movements will be significantly		St Albans City and District Council		Please refer to the response to Ref NV.1.34. The means through which the Proposed Development meets the aims of Government noise policy in the Noise Policy Statement for England (Ref 36) are presented in Table 16.2 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.02].	No

Ref	Comment	PC	LA	No PILs	Response	Change
	eroded. This would be contrary to Government policy set out in the Noise Policy Statement for England.					
Breaching of existing noise conditions						
NV.1.1 15	<p>Since 2017 the approved noise contours have been exceeded by LLA and no enforcement action has been taken by Luton Borough Council in respect of the planning conditions. The consultation accepts that LLA cannot mandate airlines to use quieter aircraft. Many of the current fleets using LLA are relatively new and are unlikely to be replaced in the near future. It is therefore considered to be over optimistic that aircraft fleets will be replaced by quieter aircraft (which appear to be only marginally quieter) by given dates. Dacorum requires greater reassurance and more detail as to how the new proposed Environmental Scrutiny Group will improve on this state of affairs and how it will operate should further breaches occur.</p>		Dacorum BC	1	<p>Complaints about existing airport operations should be directed to the Airport Operator, LLAOL.</p> <p>In respect of the Proposed Development, the Applicant has developed GCG proposals. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the GCG Explanatory Note [TR020001/APP/7.07] submitted as part of this application for development consent.</p> <p>Further information on the Environmental Scrutiny Group and how the noise limits within the Noise Envelope will be monitored and enforced is presented in the GCG</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Explanatory Note [TR020001/APP/7.07].</p> <p>Please also refer to the response to Ref NV.1.10.</p>	
NV.1.1 16	Residents do not trust the airport. It has consistently broken agreed noise limits and agreed phased growth. In particular, the lack of restraint regarding night flights is a cause for concern.	Kings Walden Parish Council		1	<p>Complaints about existing airport operations should be directed to the Airport Operator, LLAOL.</p> <p>The Noise Envelope included as part of the Proposed</p>	No
NV.1.1 17	The existing expansion permission, granted in 2013, still has seven years to run and has not yet delivered on its promised noise mitigations; any further expansion is not warranted at this time.	Kings Walden Parish Council		1	<p>Development will include enforceable and legally binding noise limits, including a night-time noise contour area limit. Further information on how the noise limits within the Noise Envelope will be monitored and enforced is presented in the GCG Explanatory Note [TR020001/APP/7.07].</p>	No
Engagement						
NV.1.1 18	In terms of mitigation measures, a Noise Envelope is being designed and CBC Officers have been engaged in this process through the Noise Envelope Design Group		Central Bedfordshire Council	1	Noted. The Applicant has engagement with the NEDG throughout the project development and this engagement, and how it has been used to develop the Noise	No

Ref	Comment	PC	LA	No PILs	Response	Change
	(NEDG). It is imperative that this involvement continues.				Envelope proposals, is described in Appendix 16.2 Operational Noise Management (Explanatory Note) of the ES [TR020001/APP/5.02].	
NV.1.1 19	The use of noise envelopes to manage noise impacts from aviation operations is becoming common practice. Buckinghamshire welcomes this approach and will continue to engage with the Noise Envelope Design Group.		Buckinghamshire County Council	1	Noted. The Applicant has engagement with the NEDG throughout the project development and this engagement, and how it has been used to develop the Noise Envelope proposals, is described in Appendix 16.2 Operational Noise Management (Explanatory Note) of the ES [TR020001/APP/5.02].	No
NV.1.1 20	Environmental health team will contact you separately with their views on this matter [noise]		Stevenage Borough Council	1	Noted.	No
NV.1.1 21	It is not clear why the Noise Working Group only has representation from Local Authorities, whereas the Noise Envelope Design Group has a much broader stakeholder representation.	United Kingdom Health Security Agency		1	The primary purpose of the Noise Working Group is to discuss and agree where possible the noise assessment with the Host Authorities and neighbouring authorities. The NEDG relates to the Noise Envelope which is the process through which benefits of future aircraft technology are shared between communities and	No

Ref	Comment	PC	LA	No PILs	Response	Change
					industry and hence necessarily contains wider stakeholder representation including industry representatives.	

Table A6.2: Regard had to statutory consultation responses on Noise comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
Noise - General				
NV.2.1	Concern about the impact of future increases in levels of noise as a result of the Proposed Development.	90	Please refer to the response to Ref NV.1.13.	No
NV.2.2	We recognise the need to manage noise at the airport. DHL makes all efforts to minimise the environmental impact, including noise, of the flights we operate by using techniques such as continuous descent approach, reduced power take offs, re-equipping the air fleet with quieter engines and investing in air fleet improvements. Across the industry, aircraft in service today are typically 12 – 15dB quieter than those just a few decades ago.	1	Noise improvements for new generation aircraft have been taken into account in the assessment and a sensitivity test on potential performance of next-generation aircraft has been undertaken and presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No
Noise - Impact				
NV.2.3	Consider existing noise pollution and/or vibration from the Airport to be too high both during the day and at night. Specific areas cited include villages and countryside in and around Hertfordshire and Bedfordshire and under the flight paths.	53	Please refer to the response to Ref NV.1.13.	No

Ref	Comment	No. PILs	Response	Change
NV.2.4	Concern about the current impact of noise from night flights, including night time cargo flights.	19	Night-time noise impacts and effects from the Proposed Development including night-time cargo flights have been assessed and presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The Proposed Development will retain the limit of 9,650 movements over a rolling 12-month period during the period of 23:30 to 06:00. The Proposed Development will result in an increase in commercial aircraft only with no additional cargo flights forecast. Please also refer to the response to Ref NV.1.13.	No
NV.2.5	Concern about the future impact of noise from increased night flights.	33		No
NV.2.6	Concern about the impact of increased noise on health and well-being. With some respondents concerned about the detrimental impact of noise on quality of sleep and health due to night flights.	40		No
NV.2.7	Concern about the impact of noise on local communities and/or residential areas and the surrounding countryside. Specific locations of concern cited were: Caddington, Slip End, Luton, Breachwood Green, St Paul's Walden, Dagnall, Stevenage, Welwyn, St Albans, Sandridge, Hatfield, Chilterns AONB, Hemel Hempstead, Berkhamsted, Tring, Harpenden, Hitchin, Letchworth, a, Leighton Buzzard, Pitstone, Whipsnade, Kensworth, Studham, Flamstead, Markyate, Gaddesden, Redbourn, Preston, Knebworth and areas of countryside in Hertfordshire, Bedfordshire, Buckinghamshire and Cambridgeshire.	58	Please refer to the response to Ref NV.1.13. All the places identified are in the vicinity of the airport and have therefore been considered in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No

Ref	Comment	No. PILs	Response	Change
NV.2.8	Concern that the Applicant continues to ignore complaints and/or denies that there is an impact of noise from the Airport.	3	<p>Complaints about existing airport operations should be directed to the Airport Operator, LLAOL.</p> <p>In respect of the Proposed Development, the Applicant has developed GCG proposals. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the GCG Explanatory Note [TR020001/APP/7.07] submitted as part of this application for development consent.</p>	No
NV.2.9	Concern about noise pollution and/or vibration during construction including from: piling, excavation (particular reference was made to the excavation of Eaton Road Landfill), earthworks and roadworks.	11	Noise and vibration impacts and effects from construction of the Proposed Development have been assessed and presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . Mitigation to avoid and reduce the effects, including through Best Practicable Means outlined in the CoCP (provided as Appendix 4.2 of the ES [TR020001/APP/5.02]) are presented.	No
NV.2.10	Concern about the impact of noise as a result of an increase in road traffic.	10	Noise impacts and effects from changes in road traffic noise due to the Proposed Development have been assessed and presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . Where possible mitigation to avoid and reduce the effects including the sustainable transport strategy is detailed in the Surface Access Strategy [TR020001/APP/7.12] and Framework Travel Plan [TR020001/APP/7.13] .	No
Noise - Assessment				
NV.2.11	Concern that the noise map does not appear to be consistent with	1	The aircraft noise model validation has been updated using extensive noise monitoring terminal measurements. Details of	Yes

Ref	Comment	No. PILs	Response	Change
	measurements taken in Breachwood Green by LBC. Note that requests for noise insulation have been responded to by Solicitors working on behalf of the Airport. Suggest a review should be taken of how many noise insulation grants have been made in different areas and published.		<p>the noise model validation process are provided in Section 6 of Appendix 16.1 Operational Noise Management Plan of the ES [TR020001/APP/5.02].</p> <p>Historic updates on the rollout of the existing noise insulation scheme are provided in Luton's Annual Monitoring Reports (Ref 52). The Noise Insulation Scheme proposed as part of the Proposed Development will be reported in the same way.</p>	
Noise mitigation and management				
NV.2.12	Suggest noise reducing fencing once the Vauxhall Way is converted into a dual carriageway.	1	The dualling of the A505 Vauxhall Way is one of several road improvement schemes for which LBC are currently seeking funding. This is an LBC delivered scheme and is not being progressed by the Applicant. There will be consultation as the scheme is developed and any noise mitigation considered necessary will be proposed as part of the planning process. Current outline plans with respect to noise mitigation can be found under the FAQs section of the Council's website. No significant effects are predicted from changes in road traffic noise on Vauxhall Way as a result of the Proposed Development. For further information please see the assessment of surface access noise in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No
NV.2.13	Suggest the erection of noise barriers (such as noise reducing fencing) around the Airport.	2	A 4m high acoustic barrier is included in the Proposed Development to screen receptors from ground noise. The barrier is located to the east and north of proposed new infrastructure, please refer to the Scheme Layout Plans [TR020001/APP/4.02] and Works Plans [TR020001/APP/4.04] . The location of the barrier moves	No

Ref	Comment	No. PILs	Response	Change
			during construction as new airport infrastructure extends to the east. As construction progresses the barrier extends along the security fence approximately between the Terminal 2 building and the Engine Run Up Bay (ERUB). See Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	
NV.2.14	Suggest reducing current noise levels and abiding by existing noise limits rather than minimising increases in noise.	1	A new legally binding process for monitoring and enforcing noise limits is proposed in the Noise Envelope. Further information on how the noise limits within the Noise Envelope will be monitored and enforced is presented in the GCG Explanatory Note [TR020001/APP/7.07] .	No
NV.2.15	Suggest that noise from the Airport needs to be reduced.	2	Please refer to response to Ref NV.1.13.	No
NV.2.16	Consider the noise envelope to be an ineffective method of mitigating against the impact of noise. With some respondents citing that the noise envelope is based on optimistic assumptions and does not cover areas impacted by noise.	1	A robust and legally binding process for monitoring and enforcing noise limits is proposed in the Noise Envelope. Further information on how the noise limits within the Noise Envelope will be monitored and enforced is presented in the GCG Explanatory Note [TR020001/APP/7.07] .	No
Noise Monitoring				
NV.2.17	Suggest that the noise monitoring point for Caddington be relocated under the flight path.	1	Please refer to the response to Ref NV.1.88. There is no permanent airport noise monitoring terminal in Caddington, but LLAOL have six portable noise monitoring terminals which they use to measure noise in local communities. LLAOL have developed a protocol for determining a suitable location of their portable monitors. When deciding on a location their main aim is to achieve an	No

Ref	Comment	No. PILs	Response	Change
			equable geographical spread around the airport so that as many communities as possible are included in the monitoring programme. LLAOL also publish a schedule of community noise monitoring on their website which demonstrates that noise monitoring has been undertaken in Caddington underneath the easterly arrival flight path.	
NV.2.18	Suggest more noise monitoring.	1	Please refer to the response to Ref NV.2.17.	No
NV.2.19	Concern that the noise monitoring and modelling is inaccurate and/or not comprehensive.	5	Please refer to the following responses: Ref NV.1.34 in respect of the noise metrics used. Ref NV.1.87 the noise model validation and baseline year. Ref NV.1.88 in respect of future monitoring.	Yes
Breaching of existing noise conditions				
NV.2.20	Concern that the Applicant continues to breach noise conditions/limits without enforcement action being taken.	29	The Applicant is not responsible for existing airport operations. Complaints about existing airport operations should be directed to the Airport Operator, LLAOL. Please refer to the response to Ref NV.1.115.	No

Table A6.3: Regard had to statutory consultation responses on Noise comments - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
Noise - General				
NV.3.1	Concern about the impact of future increases in levels of noise as a result of the Proposed Development.	1090	Please refer to the response to Ref NV.1.13.	No
NV.3.2	Consider themselves not to be affected by noise from the Airport. With some respondents citing that newer aircraft will reduce any noise from the Airport.	13	The Noise Envelope provides a mechanism for the noise benefits of next-generation aircraft to be shared with the community. See the GCG Explanatory Note [TR020001/APP/7.07] for further details.	No
Noise - Impact				
NV.3.3	Consider existing noise pollution and/or vibration from the Airport to be too high both during the day and at night. Specific areas cited include villages and countryside in and around Hertfordshire and Bedfordshire and under the flight paths.	447	Please refer to the response to Ref NV.1.13. The noise assessment presented in Chapter 16 Noise and Vibration of the ES TR020001/APP/5.01] considers all areas in the vicinity of the airport affected by noise.	No
NV.3.4	Concern about the current impact of noise from night flights, including night time cargo flights.	208	Please refer to the response to Ref NV.2.4.	No
NV.3.5	Concern about the future impact of noise from increased night flights.	286		No
NV.3.6	Concern about the cumulative noise impact of flights from Heathrow, Stanstead and Luton.	1	Potential cumulative impacts for airspace outside the LOAEL and up to 7,000ft will be assessed through the Airspace Change Proposals if there are anticipated to be any cumulative impacts between London Luton Airport and Heathrow	No

Ref	Comment	No. CC	Response	Change
			Airport. This will be the subject of a separate consultation exercise by the airport operator, LLAOL, following the Civil Aviation Authority (CAA) airspace change procedure (CAP1616), in due course.	
NV.3.7	Concern about the impact of noise on habitats and/or wildlife. Some respondents cited specific concerns about the impact of noise on the tranquillity of the Chilterns AONB, SSSIs and SACs.	18	Likely significant effects of noise and vibration on protected species are assessed and presented in Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] . An assessment of tranquillity on human receptors in accordance with the NPPF (Ref 53) paragraph 185b has been undertaken and is presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The impact of noise (amongst other factors) on tranquillity for landscape receptors, including the Chilterns AONB is assessed in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] . The impact of noise (amongst other factors) on the setting and tranquillity of heritage receptors is assessed in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] .	No
NV.3.8	Concern about the impact of increased noise on health and well-being. With some respondents concerned about the detrimental impact of noise on quality of sleep and health due to night flights.	500	Please refer to the responses to Refs NV.1.13 and NV.1.24.	No
NV.3.9	Concern about the impact of noise on local communities and/or residential areas and the	494	Please refer to the responses to Refs NV.1.13 and NV.1.24.	No

Ref	Comment	No. CC	Response	Change
	surrounding countryside. Specific locations of concern cited were: Caddington, Slip End, Luton, Breachwood Green, St Paul's Walden, Dagnall, Stevenage, Welwyn, St Albans, Sandridge, Hatfield, Chilterns AONB, Hemel Hempstead, Berkhamsted, Tring, Harpenden, Hitchin, Letchworth, a, Leighton Buzzard, Pitstone, Whipsnade, Kensworth, Studham, Flamstead, Markyate, Gaddesden, Redbourn, Preston, Knebworth and areas of countryside in Hertfordshire, Bedfordshire, Buckinghamshire and Cambridgeshire.		The noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] considers all areas in the vicinity of the airport affected by noise.	
NV.3.10	Concern that the Applicant continues to ignore complaints and/or denies that there is an impact of noise from the Airport.	42	Please refer to the response to Ref NV.2.8.	No
NV.3.11	Concern that decision makers and/or the Applicant will not experience the noise impact as a result of the Proposed Development.	12	The Planning Inspectorate will consider the application for development consent before making a recommendation to the Secretary of State who will make the final decision. They will take into consideration the impacts of the Proposed Development as well as the benefits in making a decision.	No
NV.3.12	Concern about noise pollution and/or vibration during construction including from: piling, excavation (particular reference was made to the excavation of Eaton Road Landfill), earthworks and roadworks.	131	Noise and vibration impacts and effects from construction of the Proposed Development have been assessed and presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . Mitigation to avoid and reduce the effects, including through Best Practicable Means outlined in the CoCP (provided	No

Ref	Comment	No. CC	Response	Change
			as Appendix 4.2 of the ES [TR020001/APP/5.02]) are presented. The CoCP covers piling, excavation, earthworks and roadworks.	
NV.3.13	Concern about the impact of noise as a result of an increase in road traffic.	85	Please refer to the response to Ref NV.2.10.	No
NV.3.14	Note that the consultation material confirms that the Proposed Development will result in an increase in noise.	5	Though there will be an increase in air noise levels between the scenario with and without the Proposed Development in future years, the assessment demonstrates that there will be a reduction in noise with the Proposed Development compared to the 2019 Actuals baseline.	No
Noise Mitigation and Management				
NV.3.15	Concern that proposed noise mitigation will be ineffective.	1	A robust and legally binding process for monitoring and enforcing noise limits is proposed in the Noise Envelope. Further information on how the noise limits within the Noise Envelope will be monitored and enforced is presented in the GCG Explanatory Note [TR020001/APP/7.07] . The proposed Noise Insulation Scheme represents a substantial improvement to the current offering, see Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	No
NV.3.16	Suggest reducing current noise levels and abiding by existing noise limits rather than minimising increases in noise.	1	Please refer to the response to Ref NV.3.16.	No

Ref	Comment	No. CC	Response	Change
NV.3.17	Suggest that noise from the Airport needs to be reduced. With some respondents suggesting further noise mitigation to reduce noise, including planting trees, producing a strategy to reduce noise contours, and a day-time cap on ATMs.	69	<p>The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise pollution, including Noise Insulation Scheme and a Noise Envelope. Further details can be found in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. Information about the Noise Insulation Schemes can be found in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p> <p>The effect of trees and vegetation on noise reduction is limited. Any noise reduction from a tree canopy will be primarily through scattering of noise, which primarily affects high frequency and is unlikely to affect low frequency dominated aircraft noise.</p> <p>A strategy for reducing noise effects through a reduction in noise contour area limits is contained within the Noise Envelope. The Limit is based on noise contour areas, rather than a limit on aircraft movements, as it is the noise contour area that is an appropriate measure of the noise effects on people. A limit on aircraft movements is not an effective noise control measure, as the airport operator could operate noisier aircraft up to the number of movements and there would be no</p>	No

Ref	Comment	No. CC	Response	Change
			<p>incentive for the airlines to replace their aircraft fleet with newer, cleaner and quieter aircraft.</p> <p>Please refer to the response to Ref NV.1.13.</p>	
NV.3.18	Suggest that the Applicant demonstrates reduction in noise prior to expanding.	2	Please refer to the response to Ref NV.1.13. The assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] demonstrates that there will be a reduction in noise with the Proposed Development compared to the 2019 Actuals baseline. The Applicant has developed GCG proposals to ensure that growth at the airport will only be delivered where limits on aircraft noise are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the GCG Explanatory Note [TR020001/APP/7.07] submitted as part of this application for development consent.	No
NV.3.19	Consider the noise envelope to be an ineffective method of mitigating against the impact of noise. With some respondents citing that the noise envelope is based on optimistic assumptions and does not cover areas impacted by noise.	23	Please refer to the response to Ref NV.2.16.	No
NV.3.20	Suggest consideration of maximum noise (LA _{max}).	3	Please refer to the response to Ref NV.1.34.	Yes
NV.3.21	Suggest the use of N65 and N60 metrics to better represent noise impacts rather than LA _{eq} .	1	Please refer to the response to Ref NV.1.34.	Yes

Ref	Comment	No. CC	Response	Change
Noise Monitoring				
NV.3.22	Suggest that an independent body monitors noise from the Airport.	11	Information on the independent Environmental Scrutiny Group and how the noise limits within the Noise Envelope will be monitored and enforced is presented in the GCG Explanatory Note [TR020001/APP/7.07] .	Yes
NV.3.23	Suggest more noise monitoring, including more noise monitors in St Albans and Breachwood Green. With some respondents suggesting that noise monitoring data be made publicly available; and noise monitoring equipment be made available to individuals in surrounding areas upon request to enable measurement of local noise levels.	14	Please refer to the response to Ref NV.2.17. Noise monitoring is undertaken by the airport operator, LLAOL. LLAOL have three fixed noise monitoring terminals and six portable noise monitoring terminals which they use to measure noise in local communities. LLAOL have developed a protocol for determining a suitable location of their portable monitors. When deciding on a location their main aim is to achieve an equitable geographical spread around the airport so that as many communities as possible are included in the monitoring programme. Whilst it is not practicable to provide noise monitoring equipment to individuals, LLAOL consider all requests for the positioning of the portable monitors in community areas and requests can be emailed to noise.enquiries@ltn.aero . Noise monitoring data is made publicly available through Community Noise Reports on the airport's website. LLAOL also publish a schedule of community noise monitoring on their website	Yes

Ref	Comment	No. CC	Response	Change
			which demonstrates that noise monitoring has been undertaken in St Albans and Breachwood Green.	
NV.3.24	Suggest that the Applicant provides monthly noise pollution and aircraft tracking graphs.	1	The airport operator LLAOL produces annual and quarterly monitoring reports that provide details of the airport noise performance, available on the airport's website.	No
NV.3.25	Concern that the noise monitoring and modelling is inaccurate and/or not comprehensive. Some respondents cited concern that: on ground aircraft movement is not monitored; the use of 2019 as a noise baseline year is inappropriate; average noise levels are used in assessing impact; noise monitors are purposefully not positioned under flight paths; there is no noise monitoring beneath departure routes when acceleration altitude is reached; and monitoring equipment does not conform to ISO standards.	92	<p>Please refer to the response to the following responses:</p> <p>Ref NV.1.34 in respect of the noise metrics used.</p> <p>Ref NV.1.87 the noise model validation and baseline year.</p> <p>Ref NV.1.88 in respect of future monitoring.</p> <p>Noise monitoring is undertaken by the airport operator, LLAOL. LLAOL have three fixed noise monitoring terminals and six portable noise monitoring terminals which they use to measure noise in local communities. LLAOL have developed a protocol for determining a suitable location of their portable monitors. When deciding on a location their main aim is to achieve an equitable geographical spread around the airport so that as many communities as possible are included in the monitoring programme. The distribution of permanent and portable noise monitoring terminals provides a good coverage of areas affected by aircraft noise under the various</p>	No

Ref	Comment	No. CC	Response	Change
			<p>flight paths and departure routes where acceleration altitude is reached.</p> <p>LLAOL's noise monitors were installed in 2004, prior to the publication of the ISO standard on unattended airport noise monitoring in 2009 (Ref 54). Guidance from the CAA (Ref 55) notes that compliance with the ISO standard is only required for what they define as 'Category A' airports (Luton is 'Category C'). However, a commitment has been made within the Noise Monitoring Plan of GCG that, as the airport expands, the airport operator will improve the noise monitoring stations in line with ISO standards (see Appendix C of GCG Explanatory Note [TR020001/APP/7.07]).</p>	
NV.3.26	Request clarity on where noise monitors are positioned and why.	2	<p>Noise monitoring is undertaken by the airport operator LLAOL. For information on noise monitoring, see the airport website. LLAOL have three fixed noise monitoring terminals and six portable noise monitoring terminals which they use to measure noise in local communities. LLAOL have developed a protocol for determining a suitable location of their portable monitors. When deciding on a location their main aim is to achieve an equitable geographical spread around the airport so that as many communities as possible are included in the monitoring programme. Whilst it is not practicable to provide noise monitoring equipment to individuals. LLAOL</p>	No

Ref	Comment	No. CC	Response	Change
			also publish a schedule of community noise monitoring on their website.	
NV.3.27	Concern that outdoor recreational sites, including those within the AONB are not set out as non-residential receptors in the consultation material. Particular reference was made to Ashridge and Dunstable Downs.	1	The assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] has been updated to clarify that the identified noise effects on residential receptors represents the effects on people, primarily where they live in terms of individual households and on a wider community basis. This includes any shared community open areas (e.g. parks) as well as private open space (e.g. gardens). Please also refer to the response to Ref NV.3.25.	No
NV.3.28	Suggest that a noise monitoring plan be submitted as part of the Application than being a requirement/condition of any future consent.	2	A Noise Monitoring Plan is submitted as part of the GCG Framework [TR020001/APP/7.08] .	Yes
NV.3.29	Suggest further noise monitoring locations outside the expected noise contour in order to demonstrate that limits are not being breached.	1	Please refer to the response to Ref NV.1.88.	No
NV.3.30	Suggest noise monitoring during the winter months when there is less vegetation available to absorb noise.	1	Noise monitoring is undertaken by LLAOL at three permanent locations and using six temporary noise monitors that are moved every three months. Monitoring is undertaken throughout the year and are set up to avoid overhanging vegetation. Although overhanging vegetation is avoided, any noise reduction from a tree canopy will be primarily through scattering of noise, which primarily affects high frequency and is unlikely to	No

Ref	Comment	No. CC	Response	Change
			affect low frequency dominated aircraft noise. Flora would need to be dense and of significant depth before a perceivable change in noise is noted. For example, research indicates that vegetation of between 10 and 20 m deep may reduce road traffic noise by between 2 and 3 dB (Ref 56).	
NV.3.31	Suggest that the noise modelling assesses the situation using the A321 Neo's actual performance, rather than undertaking this assessment as a sensitivity test.	1	Please refer to the response to Ref NV.1.50.	No
Noise Policy				
NV.3.32	Support the proposed noise limits.	1	Noted.	No
Breaching of existing noise conditions				
NV.3.33	Concern that the Applicant continues to breach noise conditions/limits without enforcement action being taken.	303	Please refer to the response to Ref NV.1.115.	Yes
NV.3.34	Suggest that an independent body or third party is responsible for taking enforcement action when noise limits are breached. Some respondents suggested at the Department for Transport undertake this enforcement role.	1	Information on the independent Environmental Scrutiny Group and how the noise limits within the Noise Envelope will be monitored and enforced is presented in the GCG Explanatory Note [TR020001/APP/7.07] .	Yes
Consultation - credibility				
NV.3.35	Suggest noise and air quality predictions should be revised, to present less optimistic scenarios.	1	In line with Planning Inspectorate Advice Note Nine: Rochdale Envelope (Ref 37) the	No

Ref	Comment	No. CC	Response	Change
			<p>assessment is undertaken based on a reasonable worst case. The assumptions in the noise and vibration assessment that led to the assessment of a reasonable worst case are outlined in Section 16.6 of Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. Uncertainties related to the uptake of new and next-generation aircraft and updates to health evidence are dealt with through sensitivity tests presented in Chapter 16 and Chapter 13 Health and Community of the ES [TR020001/APP/5.01].</p> <p>Air quality impacts have been assessed following best practices, as presented in Chapter 7 Air Quality of the ES [TR020001/APP/5.01], and the assessment found no significant impacts. This includes sensitivity scenarios around next generation aircraft. Conservative assumptions have also been included in the assessment and are detailed in the ES.</p>	

A7: FLIGHTPATHS

Table A7.1: Regard had to statutory consultation responses on Flightpaths - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
Current flightpaths						
FP. 1.1	Settlements in [Dacorum] are overflowed by flights operating out of a number of airports including London Heathrow in addition to LLA. For example, Markyate and Flamstead villages are both less than a kilometre from the Westerly flight path from LLA which bears approximately 70% of outgoing flights.		Dacorum Borough Council	1	Noted.	No
FP. 1.2	A section of Aylesbury Vale to the east of Aylesbury is also overflowed, at relatively low level, by northbound traffic from Heathrow. The Wendover area has both these outbound Heathrow flights and inbound Heathrow traffic exiting the “Bovingdon stack” as well as westerly departures on the Compton SID from Luton. Heathrow traffic has an impact on Luton traffic and its ability to gain altitude and Luton’s future airspace change options.		Buckinghamshire County Council	1	The current position is noted. Potential changes are subject to the broader airspace change process which is aimed at resolving interface issues between airports. This will be the subject of a separate consultation exercise by the airport operator, LLAOL, following the CAA airspace change procedure (CAP1616), in due course. The assessments for this application for development	No

Ref	Comment	PC	LA	No PILs	Response	Change
					consent assume that there are no changes to these interfaces in order to represent a reasonable worst case.	
FP. 1.3	The Luton Rising consultation proposals increase the number of overflights by around 45% (increasing traffic movements from approximately 145,000 annually (the 2019 baseline assumed to be reached following Covid Restrictions in 2024) to around 205,000 annual movements in 2043. Peak two way movements in a peak summer hour will rise from 34 to 44 and the difference in movements between a busy summer day and quieter 'off peak' day will reduce. However, there is a degree of uncertainty over how these changes will impact residents of Buckinghamshire due to the current redesign of south east airspace which could reduce the level of impacts at more distant locations (Luton's FASI-S Airspace Change Proposal is currently at "gateway 2").		Buckinghamshire County Council	1	Any changes to flightpaths are the subject of a separate airspace change process, which will be consulted on in due course. The application for development consent does not assume any changes to flightpaths and is being assessed based on the existing flightpaths continuing in order to represent a reasonable worst case. Airspace change is intended to reduce noise nuisance, and this is expected to deliver some benefits that cannot currently be quantified. There are also ongoing noise improvements expected through modernisation of the aircraft fleet and this will deliver benefits to local residents.	No

Ref	Comment	PC	LA	No PILs	Response	Change
FP. 1.4	As set out in section 3.2(e) of the Air Navigation Guidance 2017, where practicable, it is desirable that airspace routes below 7,000 feet should seek to avoid flying over AONBs and National Parks. In line with CAA expectations this must be considered by the applicant during the remainder of the DCO process.		Buckinghamshire County Council	1	Airspace change is being managed through a separate process sponsored by the Department of Transport and NATS. It will be subject to separate consultation process under CAA procedures. This process will take into account the desirability of avoiding overflying the AONB amongst other factors.	No
FP. 1.5	We welcome the commitment to carry out an assessment of the viability of employing steeper or segmented approach angles and the commitment to report on them this year. Such procedures should only be adopted if a beneficial reduction in noise impacts occurs.		Buckinghamshire County Council	1	This appears to be a comment on the proposed airspace change not the Proposed Development.	No
FP. 1.6	As you are aware, the flight paths for arrivals and departures, for Luton Airport, operate over Stevenage (easterly operations depart over Stevenage, and westerly operations arrive over Stevenage). An increase in capacity at Luton Airport would directly result in the number of aircrafts operating over Stevenage		Stevenage Borough Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	in both an easterly and westerly directions.					
FP. 1.7	The Council would like confirmation that this has been discussed with the aircraft operators who tend to lease the engines from the manufacturer. These lease agreements normally include restrictions on the angle of take-off and landing due to the additional stress on the engines. The Council would like confirmation the aircraft operators are aware of this proposal and this is a viable and feasible option. It should also be noted that while an increased angle will reduce the size of the noise envelope, the additional stress on the engines will increase emissions which will potentially have an impact on air quality in Stevenage.		Stevenage Borough Council	1	This comment relates to the airspace change process more generally. It is recognised that there is a process by which the airspace change masterplan must be approved. It is for this reason that the assessments made of the impact of the Proposed Development do not pre-suppose any particular airspace change outcome.	No
FP. 1.8	The Parish is directly under the flight path, so all our residents are affected by any changes at the airport.	Slip End Parish Council		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
Airspace change						
FP. 1.9	It is recognised that the ACP will change flight approaches, and therefore change the populations exposed. It is important that future changes to flight approach patterns are considered within future assessments and accounted for within baseline measurements.		North Hertfordshire District Council	1	At the present time, there is insufficient information regarding the coordinated airspace change proposals to allow specific potential changes to be assessed, however in a change to its approach, the Applicant has undertaken sensitivity testing to examine the sensitivity of noise contours to potential impacts of airspace change to inform the application for development consent. This is described in Chapter 5 Approach to the Assessment in the ES [TR020001/APP/5.01] . The consequences of any future changes to airspace will be the subject of a separate consultation by LLAOL under CAA procedures, in due course. The Applicant is unaware of any comment from the CAA regarding noise benefits from airspace change as the requirement to deliver noise	Yes
FP. 1.10	The final details of the ACP for Luton cannot be known until neighbouring airports in the South East have also reevaluated their future airspace changes. This leaves a significant degree of uncertainty in relation to future flight patterns and noise impacts. The CAA do not agree with the PEIR statement in para 16.1.4 that assumes the ACP will only result in noise benefits and suggest there could be some negative impacts. This raises further questions in relation to the robustness of the current noise modelling carried out in support of the PEIR, unless modelling can be based on the outcome of decisions yet to be made for ACP proposals in the SE region.		North Hertfordshire District Council	1		Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					improvement is clearly set out in CAP1616 setting out the airspace change process.	
FP. 1.11	Note that the UK is undergoing a redesign of airspace which expects to allow aircraft from the airport to climb more quickly due to the lifting constraints imposed on aircraft from neighbouring airports. We note, however, that these changes have not been accounted for within the modelling of the PEIR.		Stevenage Borough Council	1	The potential for faster climb due to lifting of constraints has not been included in the modelling to date in order to represent a reasonable worst case as the precise details of the future airspace change are not yet known.	No
FP. 1.12	The PEIR assessment is based on the impacts that would occur if no changes occur to the current airspace and flight paths, which is a valid assumption.		Buckinghamshire County Council	1	This is correct.	No
FP. 1.13	It is worth noting that the flight path changes being introduced under the Airspace Modernisation Strategy will have no impact in the parish as immediate takeoff and landing paths cannot be changed.	Slip End Parish Council		1	Noted.	No
FP. 1.14	Luton Rising will need to ensure in conjunction with the Airport Operator and NATS that suitable airspace is deployed under the FASI and LAMP programmes to support future aspirations on runway movement rates.	NATS		1	Noted. It is recognised that the FASI and LAMP programmes are aimed at ensuring that there is sufficient capacity across the South East of England to ensure that future growth	No

Ref	Comment	PC	LA	No PILs	Response	Change
					in aircraft movements can be accommodated across all airports. Luton Rising will continue to work with airport operator and NATS in support of the FASI and LAMP programmes.	
FP. 1.15	In order to confirm that the masterplan is consistent with government policy and the CAA's own statutory airspace functions, the co-sponsors must assess ACOG's progress. Based on that assessment, and before the masterplan can be implemented, the CAA must decide to formally accept the masterplan into its AMS (Airspace Modernisation Strategy), having consulted the Secretary of State.	Civil Aviation Authority			Please refer to the response to Ref FP.1.7.	No
FP. 1.16	On 27 January 2022, the CAA published its decision to accept Iteration 2 of the masterplan into the AMS. Iteration 2 of the masterplan includes an airspace change proposal sponsored by Luton airport's operator LLAOL, which is part of a cluster of strategically important changes to modernise upper airspace and lower airspace in the South of the UK. ACOG's	Civil Aviation Authority			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	current implementation plan suggests that, subject to a CAA decision to approve the ACP, this is not expected to be implemented until 2027 at the earliest.					
FP. 1.17	Draft Need Case footnote 25 states, in relation to runway capacity modelling, that "It was also assumed that in the longer term, operations at LTN would not be constrained by the operations at other airports as this is an overarching objective of the government's Airspace Modernisation programme". The CAA considers that there is some tension between these statements as on the one hand LLAL states that the DCO itself does not "directly require" changes to flightpaths over the ground but LLAL also appears to indicate that airspace modernisation will, to some extent, enable the growth envisaged through this scheme. The CAA is not aware of any evidence within the consultation documents to conclude that the projected increase in air traffic movements as proposed by the DCO can be accommodated within the existing airspace structure, and the CAA is not yet in a position to	Civil Aviation Authority			This matter has been further discussed with the CAA.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	comment on or verify, or otherwise, the assertions outlined above in the absence of any evidence from LLAL to support these statements.					
FP. 1.18	The airspace modernisation programme is at an early stage and it is not possible at this stage to say with any certainty what trade-offs might be needed to resolve a conflict between the sponsors of separate airspace changes, or between different objectives ... and therefore what benefits individual airports might achieve from airspace modernisation. In addition, any airspace change proposals intended to deliver airspace modernisation will be subject to the CAA's separate regulatory decision-making process for individual airspace change decisions under CAP 1616.	Civil Aviation Authority			Noted.	No
FP. 1.19	[Concerning p.149 of the Consultation Brochure Document where LLAL discusses second draft of Masterplan and future proposals for airspace change] It should be clarified that on 27 January 2022, the CAA published its decision to accept the latest iteration of ACOG's masterplan (Iteration 2) into the	Civil Aviation Authority			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	AMS, and relevant individual sponsors have been allowed to proceed to their CAP1616 Stage 2 gateway assessment, including LLAOL.					
FP. 1.20	We note the proposed use of a noise envelope in the DCO process which will establish the maximum parameters within which any future changes to flight paths will have to be delivered as part of the CAP 1616 process. LLAL should ensure that the noise envelopes proposed as part of the DCO process enable LLAOL, and where relevant LLAL, to comply with the requirements of the CAP 1616 process and do not unduly restrict scope for development of airspace options in any future ACPs or the ability to coordinate with other airspace change sponsors as part of the UK's airspace modernisation programme.	Civil Aviation Authority			Please refer to the response to Ref FP.1.9.	Yes
FP. 1.21	We note LLAL's view that its DCO application does not require a change to the design of the airport's airspace, as it is not considered a requirement by LLAL. However, the airspace design around Luton airport may change in the future due to the modernisation of airspace in	Civil Aviation Authority			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the south of the UK. This currently involves proposed changes to upper airspace and lower airspace at up to 16 airports, including a proposal by Luton airport's operator LLAOL.					
FP. 1.22	Future Airspace Change Processes may alter the environmental impacts of the proposal from those presented in the PEIR and subsequent Environmental Statement (ES). LLAL will need to ensure the noise envelope secured through the DCO does not unduly fetter the airspace modernisation programme that is underway and the subsequent Airspace Change Process.	Civil Aviation Authority			Please refer to the response to Ref FP.1.9.	Yes
FP. 1.23	(A) PINS Scoping Opinion - Clearly this is a material planning consideration. It helpfully confirms that airspace change is a separate process (2.2.22) and assessments should be made against confirmed flightpaths (2.2.23).	Chilterns Conservation Board			Please refer to the response to Ref RP.1.9. Assessments are being made based on the current flightpaths in accordance with the Scoping Opinion and Scoping Response [TR020001/APP/5.05] .	Yes
FP. 1.24	Noise and air quality –assessments should consider the impact on the Borough from the identified increase in activity, any resulting change in approaches/departure routes and	Welwyn Hatfield Borough Council		1	Assessments are being carried out based on existing flightpaths. In the event that changes are proposed as a consequence	No

Ref	Comment	PC	LA	No PILs	Response	Change
	holding patters, and changes to operational hours.				of the broader airspace change process, these will be subject to separate environmental assessment and consultation by LLAOL in accordance with CAA procedure, in due course.	
FP. 1.25	It is noted that future airspace changes are planned for the airport, both locally and as part of emerging wider FASI-S proposals. As the potential impact of these on East Herts is, as yet, unknown, it is considered appropriate that any permission granted in respect of the forthcoming Luton Rising application to expand to 32mppa, should include mechanisms to assess the effects and provide suitable mitigations should such airspace change have any negative impacts on the district.		East Hertfordshire District Council	1	Please refer to the response to Ref FP.1.9.	Yes
Night flights						
FP. 1.26	Moreover, as we stated at first Statutory Consultation, we question why consideration has not been given to the possibility of a night-flight ban as mitigation.		Host Authorities	4	Due to the economic value of express freight which generally operates at night, a ban on night time operations is not proposed. Night time movements however will need to fit within the night noise quota	No

Ref	Comment	PC	LA	No PILs	Response	Change
					system and GCG limits. This is set out further in the Need Case [TR020001/APP/7.04] and GCG Explanatory Note [TR020001/APP/7.07] submitted as part of the application for development consent.	
FP. 1.27	In addition to the noise insulation scheme, the Airport NPS includes an expectation by government that there will be a ban on scheduled flights within a 6.5h period between 23h00 and 07h00. 8.5.6. The consultation document references the current annual Quota Count limit that is set between 23:30 and 06:00s. LLAL may wish to provide further clarification on whether it considered a ban on night flights and its reason for discounting this approach.		Host Authorities	4	The reference in the ANPS is specific to Heathrow and not a general requirement. Consideration of a night-flight ban is set out in the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent.	No
FP. 1.28	Luton Rising plans to significantly increase the number of flights scheduled between 6:00 and 07:00 and between 23:00 and 23:30. This is a substantial increase in night flights (11pm-7am).	Kings Walden Parish Council		1	Noted.	No
FP. 1.29	Why are night time landing charges lower than daytime charges, surely this would encourage operators to		Buckinghamshire County Council	1	Landing charges are not set by the Applicant and not part of the Proposed	No

Ref	Comment	PC	LA	No PILs	Response	Change
	schedule flights to land in the night time period?				Development. This question should be directed to the airport operator.	

Table A7.2: Regard had to statutory consultation responses on Flightpaths - Planning Act 2008: Section 42 – PILs

Ref	Comment	No PILs	Response	Change
General				
FP.2.1	Concern that airlines do not adhere to flight paths.	5	This is a matter for the airport operator which has in place measures to ensure that aircraft adhere to the flightpaths up to the relevant altitude.	No
Impact				
FP.2.2	Concern that there will be an increase in flights. Some respondents were concerned about a 70 per cent increase in flights over Harpenden.	1	The Proposed Development seeks to increase number of flights by around 70% overall but aircraft are becoming quieter as new generation types replace older generation aircraft. There may be changes to how flightpaths are used in future as the airspace is modernised and this will be the subject of separate consultation undertaken by LLAOL in accordance with CAA procedure, in due course.	No
FP.2.3	Concern about the continuing impact of concentrated flight paths. Some respondents cited concern about the cumulative impact of flights from; Heathrow, Gatwick, Stansted and other airports. With some respondents specifically citing concern about concentrated flight paths over Wheathampstead; Gustard Wood; Blackmore End; Markyate; Flamstead; Harpenden; Knebworth; Woolmer Green; Welwyn Village; Sandridge; Jersey Farm; Cottered; and Ardeley.	1	The application for development consent is being assessed on the basis of the continuation of the existing flightpaths as there is a separate process of airspace change that is being coordinated across all airports in the Southeast of England. Options being considered include less concentrated flightpaths or alternative respite routes. Any changes to flightpaths will be the subject of environmental assessment and a separate consultation process by LLAOL in accordance with CAA procedure, in due course.	No
FP.2.4	Concern that aircraft altitude is too low, particularly on landing and/or take-off. With some respondents citing concern about low flying aircraft over	4	Aircraft fly according to the currently approved flightpaths. Any changes to these flightpaths are subject to a separate airspace change process and will	No

Ref	Comment	No PILs	Response	Change
	Hertfordshire; Harpenden; Ivinghoe Beacon; Dagnall; Dacorum; St Albans; Tring; the Chilterns; Markyate; Cordicote; Pepperstock; Sandridge; Slip End; Stockwood Park; Studham; Wheathampstead.		be the subject of a separate consultation by LLAOL in accordance with CAA procedure, in due course.	
FP.2.5	Concern about the impact of flight paths over towns and villages. Some respondents cited concern about the impact of flight paths over Leighton Buzzard, Luton, Knebworth, Hitchin, Stevenage, Harpenden, Chilterns AONB, Tring, Welwyn, Hertfordshire, Dagnall, St Albans, Sandridge, Caddington, Hatfield, Slip End and Woodside.	16	This concern is noted. Any changes to future flight paths is the subject of a future airspace change process being sponsored by Government and which will be subject to a separate consultation exercise by LLAOL in accordance with CAA procedure, in due course.	No
FP.2.6	Concern that the Proposed Development will result in more air traffic as there will be an increase in turn rounds.	1	The expected increase in the number of aircraft movements was set out in the Draft Need Case as part of the 2022 statutory consultation and is set out in the Need Case [TR020001/APP/7.04] , submitted as part of the application for Development Consent.	No
Airspace change				
FP.2.7	Suggest a change in flight paths. Some respondents suggest that flight paths avoid the Chilterns AONB and/or towns (including Caddington, Dagnall, Flamstead, Harpenden, Hemel Hempstead, Knebworth, Slip End, Stevenage, St Albans); flight paths should fly over major roads (such as motorways); flight paths should be narrower; flight paths should alternate to allow for respite; flight paths should return to their original course; flight paths should be at higher altitudes; flight paths should allow for continuous	5	Any changes to flightpaths are the subject of a separate airspace change process, which will be subject of a separate consultation by LLAOL in accordance with CAA procedure, in due course. A range of options is being considered as part of the airspace change process, including wider or narrower flight paths and also increased rates of climb. The application for development consent does not assume any changes to flightpaths and is being assessed based on the existing flightpaths continuing in order to represent the reasonable worst case	No

Ref	Comment	No PILs	Response	Change
	climb and descent; and/or flight paths should be directed over Bedfordshire.		scenario. However consideration has been given to the possible impact of future changes to flightpaths in future as a consequence of FASI-S on the size of the noise contours, further information can be found in Chapter 5 Approach to Assessment of the ES [TR020001/APP/5.01] .	
Night flights				
FP.2.8	DHL continues to engage with the Noise Envelope Design Group who are developing the Noise Envelope for an expanded airport and will feed into the Green Controlled Growth controls. For DHL, it is critical that the Green Controlled Growth approach provides clarity and certainty for stakeholders, recognising the differences in operations. In recent years the additional Peak Summer Night restrictions at LTN have hampered cargo operations. The restrictions, introduced following a breach of the noise contour (due to the growth of passenger traffic) has seen cargo operators unable to secure additional slots despite much lower levels of flying in 2020-2021. Going forward we believe a more nuanced approach should be applied, recognising the economic value of express cargo as well as the strategic importance of air freight in supporting UK trade.	1	This comment is noted and DHL's position needs to be reconciled with that of other consultees that have suggested reduced flight operations at night. The economic value of express freight is noted and it is for this reason that a ban on such operations is not proposed but movements will have to fit within the night noise quota system and GCG limits. This is set out further in the Need Case TR020001/APP/7.04] and the GCG Framework [TR020001/APP/7.08] submitted as part of the application for development consent.	No
FP.2.9	The decision to retain the night movement cap raises concerns for DHL in the later phases of the project as cargo is squeezed out. The proposals	1	This concern is recognised but the actual night operations will be required to fit within the noise quota system and GCG limits.	No

Ref	Comment	No PILs	Response	Change
	indicate 500 cargo movements in the night period will be displaced annually by passenger movements. Given the critical nature of the night period to express freight operators and the wider impact on productive and economic growth we would encourage Luton Rising to rethink this aspect of the proposals.			

Table A7.3: Regard had to statutory consultation responses on Flightpaths - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
General				
FP.3.1	Concern that there is a bias in selected flight paths. Some respondents cited concern that flight paths avoid Luton and/or flights disproportionately fly over Hertfordshire.	7	The flightpaths close to the airport are necessarily aligned to the direction of the runway and then are selected to minimise overflying of densely populated areas.	No
FP.3.2	Consider themselves not to be affected by existing flight paths.	2	Noted.	No
FP.3.3	Suggest that the number of flights per route over time be monitored.	1	These are monitored and reported in the Airport's Annual Monitoring Report.	No
FP.3.4	Suggest that an experiment be conducted to compare the noise effects of stepped climb and continuous climb and the locations they effect.	1	Consideration of such options is part of the airspace change process, which is proceeding independently of and in parallel with the DCO process.	No
FP.3.5	Concern that there is a lack of information on flight paths. Some respondents cited concern that no details of flight paths, their impact on the surrounding area or details of mitigation were provided.	14	The application for development consent assumes that, pending the wider airspace change process, the flightpaths will remain as existing. Full details of the current flightpaths are available on the airport operator's website.	No
FP.3.6	Suggest that airlines adhere to flight paths.	2	Please see response to Ref FP.2.1.	No
FP.3.7	Suggest more performance beacons to monitor aircraft adherence to flight paths.	1	Aircraft track keeping is already monitored by the airport operator.	No
FP.3.8	Concern regarding the nature of flights and destinations that the airport will offer following the Proposed Development. Some respondents believe	15	The demand forecasts are based primarily on the scope for growth in short haul services. It is assumed that a small number of longer haul services would be	No

Ref	Comment	No. CC	Response	Change
	that the airport should continue to focus on short-haul flights, especially in light of previous attempts to provide long-haul flights. Others believe that the airport is missing out on business by not offering long-haul flights		viable once Terminal 2 is operational but these would account for only around 5% of all flights by the time that the airport reaches 32 mppa. Further details are provided in the Need Case TR020001/APP/7.04] submitted as part of the application for development consent.	
FP.3.9	Suggest there is a need to anticipate changing customer behaviour with emphasis placed on customer profiling based on the popularity of certain destinations, flying frequency, trip duration and trip frequency, as they provide a firmer understanding of the cyclical nature of parking demand throughout the year.	1	The demand forecasting has taken account of the potential markets and catchment for passengers and how travel patterns may change as the airport grows. The Need Case TR020001/APP/7.04] , submitted as part of the application for development consent, is based on a busy month which provides a robust assessment, and ensures that the travel demands of passengers throughout the year, when demand is lower, is accounted for.	No
FP.3.10	Concern that airlines do not adhere to flight paths.	50	Please refer to response to Ref FP.2.1.	No
Impact				
FP.3.11	Concern that there will be an increase in flights. Some respondents were concerned about a 70 per cent increase in flights over Harpenden.	19	Please refer to response to Ref FP.2.2.	No
FP.3.12	Concern about the continuing impact of concentrated flight paths. Some respondents cited concern about the cumulative impact of flights from	30	Please refer to response to Ref FP.2.3.	No

Ref	Comment	No. CC	Response	Change
	Heathrow, Gatwick, Stansted and other airports. With some respondents specifically citing concern about concentrated flight paths over Wheathampstead; Gustard Wood; Blackmore End; Markyate; Flamstead; Harpenden; Knebworth; Woolmer Green; Welwyn Village; Sandridge; Jersey Farm; Cottered; and Ardeley.			
FP.3.13	Concern about an increase in concentrated flights in the early mornings and late evenings.	2	The concern is noted but the majority of aircraft using London Luton Airport are based at the airport and that means that there is a concentration of movements early in the morning when the aircraft first depart and when they return in the evening. This pattern is expected to continue as the airport grows.	No
FP.3.14	Concern that aircraft altitude is too low, particularly on landing and/or take-off. With some respondents citing concern about low flying aircraft over Hertfordshire; Harpenden; Ivinghoe Beacon; Dagnall; Dacorum; St Albans; Tring; the Chilterns; Markyate; Cordicote; Pepperstock; Sandridge; Slip End; Stockwood Park; Studham; Wheathampstead.	82	Please refer to response to Ref FP.2.4.	No
FP.3.15	Concern about the impact of air traffic on communication networks.	1	The Applicant is not aware of any specific impacts on communication networks currently. This issue should be addressed to the airport operator.	No
FP.3.16	Concern about the impact of flight paths over towns and villages. Some respondents cited concern about the impact of flight paths over Leighton Buzzard, Luton, Knebworth, Hitchin, Stevenage, Harpenden, Chilterns AONB, Tring, Welwyn,	187	Please refer to the response to Ref FM.2.5.	No

Ref	Comment	No. CC	Response	Change
	Hertfordshire, Dagnall, St Albans, Sandridge, Caddington, Hatfield, Slip End and Woodside.			
FP.3.17	Consider that a consequence of increasing aircraft movements will be the prevention of expedited climbs and that air traffic movements will be less random.	1	The ability to achieve expedited climbs is linked to the wider airspace change across the Southeast of England and not related to the number of aircraft using London Luton Airport.	No
Airspace change				
FP.3.18	Suggest there should be no expansion until airspace change has been approved.	5	Airspace change is being managed through a separate process sponsored by the Department of Transport and NATS. It will be subject to separate consultation exercise, undertaken by LLAOL in accordance with CAA procedure, in due course. Nonetheless, it is expected that any changes to airspace across the Southeast of England will have been implemented before the major expansion of capacity at London Luton Airport in the 2030s.	No
FP.3.19	Concern that the airspace is already crowded (comprising aircrafts flying from Stansted, Heathrow and Luton).	4	This is being addressed through the Government sponsored airspace modernisation programme, which is aimed at reducing delays and congestion as well as delivering environmental improvement.	No
FP.3.20	Concern that future flight paths are unknown as airspace redesign is underway and furthermore the Applicant has no control over airspace redesign. With some respondents citing concern that the benefits of airspace redesign are unknown and/or uncertain.	53	The assessments for this application for development consent are being carried out based on the existing flightpaths and do not rely on airspace change, in order to represent a reasonable worst case. It is widely anticipated that the airspace modernisation programme will reduce the impact of aircraft overflying people on the ground.	No

Ref	Comment	No. CC	Response	Change
FP.3.21	Suggest a change in flight paths. Some respondents suggest that flight paths avoid the Chilterns AONB and/or towns (including Caddington, Dagnall, Flamstead, Harpenden, Hemel Hempstead, Knebworth, Slip End, Stevenage, St Albans); flight paths should fly over major roads (such as motorways); flight paths should be narrower; flight paths should alternate to allow for respite; flight paths should return to their original course; flight paths should be at higher altitudes; flight paths should allow for continuous climb and descent; and/or flight paths should be directed over Bedfordshire.	84	Please refer to the response to Ref FP.2.7.	No
FP.3.22	Support airspace redesign and/or current flightpath changes. With some respondents citing that this will allow steeper climb and reduce noise.	8	Support noted. The airspace change process is independent of this application for development consent.	No

GLOSSARY AND ABBREVIATIONS

Term	Definition
ACOG	Airspace Change Organising Group
ACP	Airspace Change Proposal
AD6	Airspace change process concerning alterations to the arrival flight path to London Luton Airport
AEDT	Aviation Environmental Design Tool
AMSL	Above Mean Sea Level
ANPS	Airport National Policy Statement
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
ARN	Affected Road Network
ASMGCS	Advanced Surface Movement and Guidance Control System
ATC	Air Traffic Control
ATM	Air Transport Movement
BNG	Biodiversity Net Gain
BPM	Best Practicable Means
BREEAM	Building Research Establishment's Environmental Assessment Method

Term	Definition
C	Change. Used in Appendices L and M to describe whether there has been a change to the project in response to the comment (Y = Yes / N= No).
CAA	Civil Aviation Authority
CAP1616	CAP1616: Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information
CAP771	CAP 771: Connecting the Continents: Long Haul Passenger Operations from the UK
CBC	Central Bedfordshire Council
CC	Community Consultee - Community Consultees with whom we have a duty to consult as prescribed under Section 47 of the Planning Act 2008
CCB	Chilterns Conservation Board
CCG	Chilterns Countryside Group
CDEW	Construction Demolition and Excavation waste
CHMP	Cultural Heritage Management Plan
CIL	Community Infrastructure Levy
CIRIA	Construction Industry Research and Information Association
CL:AIRE	Independent organisation established to stimulate the regeneration of contaminated land in the UK
CoCP	Code of Construction Practice
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation

Term	Definition
CO2	Carbon dioxide
CPO	Compulsory Purchase Order
CROW	Countryside Right of Way
CTMP	Construction Traffic Management Plan
CWS	County Wildlife Sites
dB	Decibel
DBA	Desk-based Assessment
DBC	Dacorum Borough Council
DCO	Development Consent Order
DfT	Department for Transport
DIV	Document Inspection Venue
DMRB	Design Manual for Roads and Bridges
DN	Do-Nothing
DoWCoP	Definition of Waste: Code of Practice
DS	Do-Something
ECC	Essex County Council
EEAST	East of England Ambulance Service

Term	Definition
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERUB	Engine Run-Up Bay
ES	Environmental Statement
ES NTS	Environmental Statement – Non-technical Summary
ETS	Employment and Training Strategy
EU	European Union
EWR	East West Rail
FASI-S	Modernisation of airspace across the South East of England
FIRST	Future LuToN Impact Reduction Scheme for the Three Counties which was consulted on in 2019. It has since been updated to become Community First.
FTG	Fire Training Ground
FWRA	Foundations Works Risk Assessment
FTP	Framework Travel Plan
GCG	Green Controlled Growth
GDP	Gross Domestic Product
GHG	Greenhouse Gases

Term	Definition
GVA	Gross Value Added
HAWRAT	Highways Agency Water Risk Assessment Tool
HA	Host Authorities
HE	Highways England
HEWART	Highways England Water Risk Assessment Tool
HFOV	Horizontal Field of View
HIA	Health Impact Assessment
HRA	Habitat Regulation Assessment
HRA NSER	Habitat Regulations Assessment No Significant Effects Report
HS2	High Speed 2
HSE	Health and Safety Executive
ICAO	International Civil Aviation Organisation
LA	Local Authority
LAeq	A-weighted, equivalent continuous sound level
LBC	Luton Borough Council
LBMP	Landscape and Biodiversity Management Plan
LCA	Landscape Character Area

Term	Definition
LIR	Local Impact Report
LLAL	London Luton Airport Limited (the airport owner). LLAL has been rebranded as Luton Rising.
LLAOL	London Luton Airport Operations Limited (the airport operator)
LLFA	(Luton, Central Bedfordshire and Hertfordshire) Lead Local Flood Authority
LLP	Luton Local Plan
Lmax	The maximum sound level measured during a single noise event
LOAEL	Lowest Observed Adverse Effect Level
LPA	Local Planning Authority
Luton DART	Luton Direct Air Rail Transport
LVIA	Landscape and Visual Impact Assessment
mppa	Million passengers per annum
MA&D	Major Accidents and Disasters
MSCP	Multi-Storey Car Park
MTOW	Maximum Take-off Weight
NAEI	National Atmospheric Emissions Inventory
NATS	National Air Traffic Services
NEDG	Noise Envelope Design Group

Term	Definition
NHDC	North Hertfordshire District Council
NMP	Noise Mitigation Plan
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
OBR	Office of Budget Responsibility
ONS	Office for National Statistics
OSWMP	Outline Site Waste Management Plan
PC	Prescribed Consultee
PEIR	Preliminary Environmental Information Report
POCG	Planning Officers Coordination Group
POS	Public Open Space
Persons of Restricted Mobility	A physical or mental impairment that has a substantial and long term adverse effect on a person's ability to carry out normal day-to-day activities
PHE	Public Health England
PIL	Persons with Interest in the Land as prescribed under Section 44 of the Planning Act 2008
PINS	The Planning Inspectorate
PPG	Planning Practice Guidance

Term	Definition
PRoW	Public Rights of Way
RICS	The Royal Institute of Chartered Surveyors
RNAV	Area Navigation
ROA	Remediation Options Appraisal
RPG	Registered Park and Garden
RVAA	Residential Visual Amenity Assessment
S106	Section 106
SAC	Special Area of Conservation
SAETS	Getting to and from the Airport - Our Emerging Transport Strategy
SAFs	Sustainable Aviation Fuels
SAS	Surface Access Strategy
SIA	Simple Index Approach
SOAEL	Significant Observed Adverse Effect Level
SoCC	Statement of Community Consultation
SMP	Soil Management Plan
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System

Term	Definition
SWMP	Site Waste Management Plan
The Act	Planning Act 2008
Proposed Development	A new terminal and associated infrastructure to increase the number of flights and passengers the airport can handle, from 18 to 32 million passengers per annum by the mid-2040s.
T1	Terminal 1, the existing terminal
T2	Terminal 2
TA	Transport Assessment
TP	Travel Plan
UK HSA	UK Health Security Agency
UXO	Unexploded Ordnance
WCHs	Walkers, cyclists and horseriders
WDR	Works Description Report
WFD	Water Framework Directive
WHO	World Health Organisation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

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- ¹ Department for Transport (2022) *Jet Zero Strategy Delivering net zero aviation by 2050*. London: OGL.
- ² England's Economic Heartland Strategic Alliance (2021) *Connecting People, Transforming Journeys: Regional Transport Strategy*. Aylesbury.
- ³ Host Authority refers to the joint response prepared by WSP and submitted on behalf of Hertfordshire County Council, North Hertfordshire District Council, Central Bedfordshire Council and Luton Borough Council. Dacorum Borough Council was identified as a host authority shortly before the 2022 statutory consultation but was not part of this response. Dacorum Borough Council submitted their own response identified as 'Dacorum BC' in the LA column in the following tables.
- ⁴ Secretary of State for Transport (2013) Aviation Policy Framework. Cm 8584. London: TSO
- ⁵ Department for Transport, 2013, Aviation Policy Framework.
- ⁶ Department for Transport (2022) *Jet Zero Strategy: delivering net zero aviation by 2050*. London: OGL.
- ⁷ Luton Rising (2022) *A Net Zero Strategy for Luton Rising*. Available at <https://lutonrising.org.uk/wp-content/uploads/2022/02/Net-Zero-Strategy-1.pdf>.
- ⁸ IPCC, 2018: Summary for Policymakers. In: *Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty* [Masson-Delmotte, V., P. Zhai, H.-O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R. Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, and T. Waterfield (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA, pp. 3-24,
- ⁹ British Standards Institution (2022) *Achieving Net Zero Emissions*. Available at <https://www.bsigroup.com/en-GB/topics/sustainable-resilience/net-zero/>.
- ¹⁰ Department for Transport (2022) *Jet Zero Strategy Delivering net zero aviation by 2050*. London: OGL.
- ¹¹ Committee on Climate Change (2020) *The Sixth Carbon Budget The UK's path to Net Zero*.
- ¹² Institute of Environmental Management and Assessment (IEMA) (2022) Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance
- ¹³ Committee on Climate Change (2020) *The Sixth Carbon Budget The UK's path to Net Zero*.
- ¹⁴ The Tyndall Centre for Climate Change Research (2022) *Carbon Budget Reports*. Available at <https://carbonbudget.manchester.ac.uk/reports/>
- ¹⁵ Committee on Climate Change (2020) *The Sixth Carbon Budget The UK's path to Net Zero*.
- ¹⁶ Institute of Environmental Management and Assessment (IEMA) (2022) Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance
- ¹⁷ CCC(2020) Policies for the Sixth Carbon Budget and Net Zero. Available at: www.theccc.org.uk
- ¹⁸ Department for Transport (2018) *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England*. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/858533/airports-nps-new-runway-capacity-and-infrastructure-at-airports-in-the-south-east-of-england-web-version.pdf
- ¹⁹ Intergovernmental Panel on Climate Change (IPCC) (2022) *Climate Change 2022 mitigation of Climate Change Working Group III contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*. UNEP.
- ²⁰ HM Government (2022) *UK Climate Change Risk Assessment 2022* London: OGL
- ²¹ Met office. (2022) UK climate Projections (UKCP). Available at: <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp>.
- ²² London Luton Airport Operations Limited (LLAOL) (2019) *Climate Change Adaptation Report (CCAR)*. Available at: <https://www.london-luton.co.uk/LondonLuton/files/5a/5a611fd0-11af-4e1c-acf3-52df0ab4a240.pdf>
- ²³ Department for Transport (2021) *Decarbonising Transport A Better, Greener Britain*
- ²⁴ Department for Transport (2013) *Guidance on the Protection of Regional Air Access to London*. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918791/ps0-policy-guidance-optimized-version.pdf
- ²⁵ Department for Transport (2021) *Decarbonising Transport: A Better, Greener Britain*. London: OGL.

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- 26 Department for Transport, June 2018, The future of UK aviation: making best use of existing runways
 - 27 London Luton Airport Operations Ltd (2019), Environmental Noise Directive Noise Action Plan 2019 – 2023
 - 28 Highways England (2020); Design Manual for Road and Bridges LA111: Noise and Vibration, Revision 2
 - 29 Department for Communities and Local Government (2019), Planning Practice Guidance: Noise
 - 30 World Health Organisation (2018) Environmental Noise Guidelines for the European Region
 - 31 Ministry of Housing, Communities & Local Government (2021), National Planning Policy Framework
 - 32 Her Majesty's Stationery Office (2017), The Town and Country Planning (Environmental Impact Assessment) Regulations 2017
 - 33 Department for Transport (2017), Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace
 - 34 Civil Aviation Authority (2021), CAP1506: Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition
 - 35 Her Majesty's Stationery Office (1982), Civil Aviation Act.
 - 36 Department for Transport (2017), Air Navigation Guidance.
 - 37 Department for Transport (2017), Air Navigation Guidance.
 - 38 Eurocontrol, Aircraft Noise and Performance (ANP) Database, <https://www.aircraftnoisemodel.org/>
 - 39 Department for Environment Food and Rural Affairs (2010), Noise Policy Statement for England
 - 40 Planning Inspectorate (2018), Advice Note Nine: Rochdale Envelope
 - 41 HM Government, Planning practice Guidance, Noise. Last updated 22 July 201
 - 42 World Health Organisation (2018), Environmental Noise Guidelines for the European Region
 - 43 World Health Organisation (2009), Night Noise Guidelines for Europe.
 - 44 International Civil Aviation Organization (2022), Environmental Trends in Aviation to 2050
 - 45 Department for Transport (2017), Air Navigation Guidance
 - 46 Department for Transport (2017), Air Navigation Guidance
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