

February 2023

# London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 6 Consultation Report

## **6.01 Consultation Report**

Application Document Ref: TR020001/APP/6.01

Planning Act 2008

APFP Regulation: 5(2)(q)

**The Planning Act 2008****The Infrastructure Planning (Applications: Prescribed Forms and Procedure)  
Regulations 2009****London Luton Airport Expansion Development Consent Order  
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**6.01 CONSULTATION REPORT**

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## Executive Summary

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Luton Rising (a trading name of London Luton Airport Limited, hereafter referred to as the Applicant) is a business and social enterprise owned by a sole shareholder, Luton Borough Council, for community benefit. Luton Rising is at the heart of a movement for positive change in the Luton community.

The Applicant is seeking to make best use of the existing runway at London Luton Airport (the airport) by constructing a new terminal and associated infrastructure to increase the number of flights and passengers the airport can handle (the Proposed Development), increasing its current permitted capacity from 18 million passengers per annum (mppa) to 32 mppa by the mid 2040s.

The evolution of the Proposed Development has been informed by extensive consultation and engagement between the Applicant and the local community, local authorities, Persons with an Interest in the Land (PILs) and Prescribed Consultees. This Consultation Report sets out the consultation process, the feedback received and how the Applicant has had regard to responses received, including how feedback has influenced or been incorporated into the Proposed Development.

The pre-application consultation process comprised the following main stages:

- a. non-statutory consultation (25 June 2018 to 31 August 2018);
- b. 2019 statutory consultation (16 October 2019 to 16 December 2019); and
- c. 2022 statutory consultation (8 February 2022 to 4 April 2022).

Informal stakeholder engagement has also been undertaken throughout the pre-application stage. Responses to all rounds of consultation have been carefully considered and used to inform the Proposed Development.

The 2019 and 2022 statutory consultations were undertaken in accordance with the requirements of the Planning Act 2008 (Ref <sup>1</sup>).

Statements of Community Consultations (SoCC) were produced for both statutory consultations setting out how the Applicant proposed to consult about the proposed application for development consent with people living in the vicinity of the land. The host and neighbouring authorities were consulted on the draft SoCCs, with comments being addressed in the published versions as appropriate. Consultation was undertaken in accordance with the SoCCs for both rounds of statutory consultation.

At the start of each round of statutory consultation Prescribed Consultees, local authorities and PILs were notified of the consultation by letter. Newsletters were posted to properties in the vicinity of the airport to notify the community about the consultations. This was supplemented by a broad range of publicity including posters, newspaper notices (statutory notices and advertisements), radio advertisements and social media. The approach to engaging hard-to-reach groups was agreed with the host authorities in advance of the statutory consultations.

A range of engagement methods were used to ensure the consultations were inclusive and accessible to all, including a website, phonenumber, consultation events methods and Document Inspection Venues.

In total, 892 responses were received for the 2018 non-statutory consultation, with 3,501 and 3,790 responses received to the 2019 and 2022 statutory consultations, respectively.

Key changes to the Proposed Development following the 2018 non-statutory consultation included:

- a. reducing the scale of expansion from 36-38 mppa to 32 mppa;
- b. the preferred configuration of the Proposed Development;
- c. the introduction of a legally enforceable Noise Envelope;
- d. changes to the area of Wigmore Valley Park to be used for the Proposed Development as well as a commitment to increasing public open space by 10%;
- e. a new stream of community funding called FIRST to help better share the resources created by the growth of the airport between Luton and the surrounding local authorities in perpetuity;
- f. changes to construction, ensuring greater use of on-site earthworks material, rather than importing vast quantities of earth; and
- g. the introduction of a commitment of at least 45% of all passenger journeys to and from the airport being made by public transport and other sustainable travel methods.

Key changes to the Proposed Development following the 2019 statutory consultation included:

- a. the introduction of the Green Controlled Growth (GCG) framework to better manage the potential effects of the Proposed Development;
- b. changes to FIRST, renamed to Community First, ensuring more direct beneficial use of available funds, by targeting areas of high deprivation in the region and by helping to finance local decarbonisation projects;
- c. additional sustainability measures incorporated into the new terminal, including solar and geothermal renewable energy production and rainwater harvesting;
- d. a commitment to designing the new terminal to BREEAM Excellent principles;
- e. construction changes to reduce the size of the airfield platform and landside remediation works; and
- f. general changes to design including reconfiguration of taxiways, realigning the position of the new stands, reducing the size of hardstanding, moving the fuel storage facility further away from the runway and a new access road to the Fire Training Ground.

Key changes to the Proposed Development following the 2022 statutory consultation included:

- a. the design of Terminal 1 was changed to include an extension to the baggage hall and departure lounge as well as the introduction of a new boarding pier;

- b. updated approach to noise compensation to include a Noise Insulation Scheme for those properties within the night-time Significant Observed Adverse Effect Level contour;
- c. surface access changes included the Applicant setting out a process for identifying more ambitious surface access targets, and greater certainty and transparency as to how environmental effects, including surface access, would be measured and reported;
- d. a new 33kV substation to cater for an early increase in electric demand, ahead of and to supplement the second 33kV substation proposed to support Terminal 2; and
- e. additional sensitivity testing to ensure that the assessment of the impacts of the Proposed Development takes account of different scenarios.

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# 1 INTRODUCTION

## 1.1 The Proposed Development

1.1.1 Luton Rising (a trading name of London Luton Airport Limited, hereafter referred to as the Applicant) is a business and social enterprise owned by a sole shareholder, Luton Borough Council, for community benefit. Luton Rising is at the heart of a movement for positive change in the Luton community.

1.1.2 The Applicant is seeking to make best use of the existing runway at London Luton Airport (the airport) by constructing a new terminal and associated infrastructure to increase the number of flights and passengers the airport can handle (the Proposed Development). The current permitted capacity of the airport is 18 million passengers per annum (mppa), and the Proposed Development seeks to increase this to 32 mppa by the mid 2040s.

## 1.2 Project background

1.2.1 In December 2017, Luton Rising published the 'Vision for Sustainable Growth 2020-2050' (Ref 2). The Vision outlines the intention:

*“to make best use of the existing runway at LTN (London Luton Airport) to provide the maximum benefit to the local and sub-regional economy; to deliver good levels of service; and to actively manage environmental impacts at the local and wider levels in line with our wider commitment to responsible and sustainable development.”*

1.2.2 In early 2020, the airport was the fifth largest airport in the UK, handling almost 18 mppa prior to the Covid-19 pandemic. In 2017, it sustained around 27,000 jobs across the UK, strongly supporting the sub-regional economy, and contributed approximately £1.8 billion to the UK economy. In 2018/19, the airport contributed more than £8 million in community investment funding. Passenger growth trends to 2019 showed the airport to be one of the fastest growing airports in the UK.

## 1.3 Overview of pre-application process

1.3.1 The pre-application consultation process comprised the following main stages:

- a. non-statutory consultation (25 June 2018 to 31 August 2018);
- b. 2019 statutory consultation (16 October 2019 to 16 December 2019); and
- c. 2022 statutory consultation (8 February 2022 to 4 April 2022).

1.3.2 Informal stakeholder engagement has also been undertaken throughout the pre-application stage. Responses to all rounds of consultation have been carefully considered and used to inform the Proposed Development.

### ***2018 non-statutory consultation***

1.3.3 The 2018 non-statutory consultation presented options to expand the airport by making best use of the existing runway. Information on a long list of potential options was presented, and a description of the sifting process the Applicant

went through to reach a short list of four options was provided. The non-statutory consultation sought views on these four options.

- 1.3.4 Information about each of the options was presented, and the option appraisal process was described in two reports, the Sift 1 and Sift 2 Reports which are available in Appendix B of the **Design and Access Statement [TR020001/APP/7.03]**.
- 1.3.5 The four options identified for non-statutory consultation comprised three options that focused development to the north of the runway, and a fourth option that focused development to the south of the runway. Of these options, Option 1a, which focused development to the north of the runway and had two terminals, was identified as the emerging preferred option prior to the consultation commencing.
- 1.3.6 Feedback from the 2018 non-statutory consultation was carefully considered after the consultation had closed, and the options appraisal work was updated to take the responses into account. One of the themes which emerged in comments by stakeholders and the public regarding the options proposed for the north-side of the runway was the impact on Wigmore Valley Park.
- 1.3.7 In response to these concerns a new option was developed as part of the 'northern' option family, which accommodated expansion north of the existing runway whilst retaining Wigmore Valley Park. This was called Option 1d. This option performed poorly when assessed against the sift criteria.
- 1.3.8 Feedback suggested that, of the proposals presented, the emerging preferred option (1a) did have the support of respondents when compared to the other possible options for expansion. The feedback received for this option was one of the factors which contributed to Option 1a progressing to the next stage.
- 1.3.9 A consultation report summarising the 2018 consultation feedback and how it had informed the scheme was published after the consultation, alongside the Sift 3 report summarising the updated options appraisal. A copy of the 2018 consultation feedback report can be found in **Appendix A** and the Sift 3 report is appended to the **Design and Access Statement [TR020001/APP/7.03]**.

### ***2019 statutory consultation***

- 1.3.10 The purpose of the 2019 statutory consultation was to seek views on the preferred option which had been developed in response to feedback from the 2018 non-statutory consultation.
- 1.3.11 Information about the preferred option was presented, including detailed information about potential impacts as set out in technical documents, including the Preliminary Environmental Information Report (PEIR), Surface Access Strategy Report, Scheme Development and Construction Report and Compensation Proposals.
- 1.3.12 After the 2019 statutory consultation period had closed, all feedback was carefully considered and changes were made to the Proposed Development in response to comments received and other factors. The key changes were as follows:

- a. the introduction of the GCG framework to better manage the potential effects of the Proposed Development;
- b. changes to FIRST, renamed to Community First, ensuring more direct beneficial use of available funds, by targeting areas of high deprivation in the region and by helping to finance local decarbonisation projects;
- c. additional sustainability measures incorporated into the new terminal, including solar and geothermal renewable energy production and rainwater harvesting;
- d. a commitment to designing the new terminal to BREEAM Excellent principles;
- e. construction changes to reduce the size of the airfield platform and landside remediation works; and
- f. general changes to design including reconfiguration of taxiways, realigning the position of the new stands, reducing the size of hardstanding, moving the fuel storage facility further away from the runway and a new access road to the Fire Training Ground.

1.3.13 After the 2019 statutory consultation had closed there were significant changes to the context in which the application for development consent was being developed, most notably the Covid-19 pandemic. The impact of the Covid-19 pandemic, and reduction in international aviation was felt by all UK airports. These unforeseen circumstances led the Applicant to re-evaluate the trajectory of future growth at the airport and review the Proposed Development. Despite the pandemic, a continued opportunity to further expand the offering at the airport to continue meeting the long-term demand for air travel in south east England was identified, in turn helping the Government to meet its ambitions to increase freight and passenger movement capacity.

1.3.14 The changes to the Proposed Development combined with the new context in which the application for development consent was being brought forward led the Applicant to determine that an additional round of statutory consultation should be held so that everyone had an opportunity to comment on the updated proposals. This second round of statutory consultation took place in early 2022.

1.3.15 A consultation report summarising the 2019 statutory consultation feedback and how it had informed the scheme was published as part of the 2022 statutory consultation.

### ***2022 statutory consultation***

1.3.16 The 2022 statutory consultation sought views on the Proposed Development as updated to reflect the 2019 feedback and wider context changes. As for the 2019 statutory consultation, detailed information about the potential impact of the Proposed Development was presented in a suite of technical reports including for example the PEIR, the draft surface access report entitled “Getting to and from the airport – our emerging transport strategy” and the Draft Need Case.

- 1.3.17 Feedback to the 2022 statutory consultation was carefully considered and changes were made to the Proposed Development in response. The key changes were as follows:
- a. the design of Terminal 1 was changed to include an extension to the baggage hall and departure lounge as well as the introduction of a new boarding pier;
  - b. updated approach to noise compensation to include a Noise Insulation Scheme for those properties within the night-time Significant Observed Adverse Effect Level contour;
  - c. surface access changes included the Applicant setting out a process for identifying more ambitious surface access targets, and greater certainty and transparency as to how environmental effects, including surface access, would be measured and reported;
  - d. a new 33kV substation to cater for an early increase in electric demand, ahead of and to supplement the second 33kV substation proposed to support Terminal 2;
  - e. and additional sensitivity testing to ensure that the assessment of the impacts of the Proposed Development takes account of different scenarios.

## 1.4 Local authority engagement

### *Planning Officers Coordination Group*

- 1.4.1 The Applicant has carried out extensive engagement with the planning officers from the host authorities (Luton Borough Council (LBC), Central Bedfordshire Council, North Hertfordshire District Council, Dacorum Borough Council and Hertfordshire County Council) throughout the pre-application period.
- 1.4.2 The 'Planning Officers Coordination Group' (POCG) was set up by the Applicant in 2018 following the non-statutory consultation. The first meeting was held on 3 October 2018. Before this, regular meetings with the same group of officers also took place. Since 2021 the POCG has met approximately monthly.
- 1.4.3 The POCG comprises officers from the following host authorities (as defined under Section 43(1) of the Act):
- a. Central Bedfordshire Council;
  - b. Hertfordshire County Council;
  - c. LBC; and
  - d. North Hertfordshire District Council.
- 1.4.4 These meetings have covered a range of topics which have allowed the host authorities to be informed about, and engaged in, the development of the proposals. The initial meetings included a review of the Planning Performance Agreement and the development of the working arrangements between the Applicant and the host authorities.

- 1.4.5 Later meetings have included discussions of various aspects of the proposals, including the EIA methodology and cumulative effects assessments, GCG (including a discussion on the approach to limits), aviation demand forecasts, and updates regarding the development of the Community First fund. The host authorities have also been provided with regular updates regarding the key issues which have been discussed across the various Technical Working Groups (TWGs), and the Noise Envelope Design Group (NEDG) in particular.
- 1.4.6 There have also been opportunities for the host authorities to discuss and provide their feedback on the proposals for engaging with hard-to-reach groups and the Statement of Community Consultation for both the 2019 and 2022 statutory consultations. Prior to the launch of each statutory consultation, the host authorities were provided with regular updates about the plans for the consultation, and were given the opportunity to comment on these.
- 1.4.7 Following the close of the 2022 statutory consultation, the meetings with the host authorities have been focused on agreeing the format and content of the Statement of Common Ground (SoCG) and the process for progressing this. As part of this, topic specific workshops have been held to discuss specific matters that will be covered within the SoCG.
- 1.4.8 In recognition that the Proposed Development would have a wider impact than just the host local authority areas, the Applicant also established a group of wider planning officers, initially called the Technical Stakeholder Group. The group was made up of officers from the host authorities involved in the POCG, in addition to officers from the neighbouring authorities. The group meetings provided the authorities with an update on the project in general, alongside updates about the statutory consultations, surface access, EIA, and GCG.
- 1.4.9 This wider group comprises officers from the “neighbouring” local authorities as defined by Section 43(2) of the Act, as follows:
- a. Barnet Council;
  - b. Bedford Borough Council;
  - c. Buckinghamshire Council;
  - d. Cambridgeshire County Council;
  - e. Dacorum Borough Council;
  - f. East Hertfordshire District Council;
  - g. Enfield Council;
  - h. Essex County Council;
  - i. Harrow Council;
  - j. Hillingdon Council;
  - k. Huntingdonshire District Council;
  - l. Milton Keynes Council;
  - m. South Cambridgeshire District Council;
  - n. St Albans City & District Council;

- o. Stevenage Borough Council;
- p. Uttlesford District Council; and
- q. Welwyn Hatfield Borough Council.

- 1.4.10 This wider group met periodically as necessary. The first meeting of the wider group was held on 3 October 2018. Before the 2019 statutory consultation the wider group were invited to meetings/briefings on 13 February 2019, 17 April 2019, 19 June 2019, 7 August 2019 and 9 October 2019. Before the start of the 2022 statutory consultation the wider group were invited to two briefing sessions on 26 January and 2 February 2022. These sessions provided an overview of the consultation documents, as well as information about the document architecture and wayfinding. The local authorities were also given a tour of the virtual consultation room. There was also a meeting held with the wider group on 29 September 2021.
- 1.4.11 Shortly before the 2022 consultation, in January 2022, following a review of draft Order Limits for the Proposed Development it was identified that a small area of highway works within the draft Order Limits was located inside Dacorum Borough Council. The draft Order Limit red line was not amended between 2019 and 2022 and as such Dacorum Borough Council should have been consulted as a host authority, rather than neighbouring authority, in 2019.
- 1.4.12 From January 2022 onwards Dacorum Borough Council were therefore treated as a host authority and included in the POCG. This in turn meant that Three Rivers became a neighbouring authority, and they were subsequently included in the wider group.
- 1.4.13 In addition to this, engagement has also been carried out with the emergency resilience and planning officers from LBC, Central Bedfordshire Council and North Hertfordshire District Council, to discuss matters related to major accidents and disasters, including the major accidents and disasters assessment methodology and results.
- 1.4.14 More detailed information on engagement with local authorities specifically undertaken for each round of consultation can be found throughout this report.

## 1.5 Purpose of this Report

- 1.5.1 Under Section 31 of the Planning Act 2008 (as amended) (the Act) (Ref 1), where a project is deemed a Nationally Significant Infrastructure Project (NSIP) a Development Consent Order (DCO) is required. The Proposed Development is considered an NSIP under Section 23(1)(b) and 23(1)(c) of the Act and therefore requires a DCO.
- 1.5.2 Under Section 37(3)(c) of the Act, a DCO application is required to be accompanied by a Consultation Report. Section 37(7) of the Act requires a Consultation Report to document:
- a. what has been done in accordance with Sections 37, 47, 48 and 49 of the Act;
  - b. responses to the consultation undertaken; and



c. the consideration given to the responses.

- 1.5.3 In addition to the Act, paragraph 80 of statutory guidance issued by the formerly known Department of Communities and Local Government (DCLG) entitled '*Planning Act 2008: Guidance on the pre-application process*' (March 2015) (Ref 3) requires consultation reports to set out what the Applicant has done to comply with the requirements of the Act with regards to relevant secondary legislation, guidance and any relevant policies or advice published by Government or the Planning Inspectorate. Paragraph 80 also states that where the Applicant has not followed the advice of the local authority or not complied with statutory guidance or any relevant advice note, it must provide an explanation for the action taken or not taken.
- 1.5.4 Consultation on the Proposed Development has been undertaken in compliance with all applicable requirements of the Act and with relevant secondary legislation, the statutory guidance and relevant policies, guidance or advice published by Government or the Planning Inspectorate.
- 1.5.5 This Consultation Report has been compiled in accordance with the statutory requirements outlined in Section 37(7) of the Act. It details the consultation process undertaken by the Applicant, the feedback received and how the Applicant has had regard to responses received including how feedback has influenced or been incorporated into the Proposed Development in the application for development consent.
- 1.5.6 This report forms part of a suite of documents accompanying the application for development consent submitted in accordance with the requirements set out in Section 55 of the Act and regulations 5, 6 and 7 of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (APFP Regulations 2009) (Ref 4) and should be read alongside those documents.
- 1.5.7 This report is based on the analysis of responses received, in relation to consultation activities undertaken by the Applicant.

## **1.6 Structure of this report**

- 1.6.1 The first part of this report focusses on the process for the three main stages of consultation along with informal stakeholder engagement. The second part focuses on the key findings from each round of statutory and non-statutory consultation and how they have informed the Proposed Development. It includes the following sections:
- a. Introduction;
  - b. 2018 non-statutory consultation process;
  - c. 2019 Statement of Community Consultation;
  - d. 2019 statutory consultation process;
  - e. 2022 Statement of Community Consultation;
  - f. 2022 statutory consultation process;

- g. Informal stakeholder engagement;
- h. Overview of responses;
- i. Quantitative analysis of closed questions;
- j. Scheme changes in response to 2018 non-statutory consultation;
- k. Scheme changes in response to 2019 statutory consultation; and
- l. Scheme changes in response to 2022 statutory consultation.

- 1.6.2 The document includes the following Appendices (which are separately bound):
- a. **Appendix A** contains the 2018 non-statutory consultation materials;
  - b. **Appendix B** contains the published 2019 Statement of Community Consultation and associated documents;
  - c. **Appendix C** contains the 2019 statutory consultation notices;
  - d. **Appendix D** contains a list of the 2019 Prescribed Consultees;
  - e. **Appendix E** contains the 2019 statutory consultation materials;
  - f. **Appendix F** contains copies of publicity for the 2019 statutory consultation;
  - g. **Appendix G** contains the published 2022 Statement of Community Consultation and associated documents;
  - h. **Appendix H** contains the 2022 statutory consultation notices;
  - i. **Appendix I** contains a list of the 2022 Prescribed Consultees;
  - j. **Appendix J** contains the 2022 statutory consultation materials;
  - k. **Appendix K** contains copies of publicity for the 2022 statutory consultation;
  - l. **Appendix L** contains the 2019 statutory consultation due regard tables;
  - m. **Appendix M** contains the 2022 statutory consultation due regard tables; and
  - n. **Appendix N** contains information related to additional PILs not consulted.
- 1.6.3 **Table 1.1** below sets out the full list of appendix files.

Table 1.1: Schedule of Appendix files

<b>Appendix A Non-Statutory Consultation Materials and Feedback Report</b>		
A	1	Non-Statutory Consultation Feedback Report February 2019
A	2	List of stakeholders contacted
A	3	Newspaper advertisements
A	4	Photo of newspaper advertisements in newspaper
A	5	Example posters
A	6	Example letters sent to residents
A	7	Flyer sent to residents
A	8	Example email sent at start of consultation
A	9	Example email sent at end of consultation
A	10	Letter to landowners
A	11	Notes of POCG meeting 22 June 2018
A	12	2018 press release
<b>Appendix B 2019 Statutory Consultation Statement of Community Consultation</b>		
B	1	Draft Statement of Community Consultation
B	2	Example cover letter to host authorities
B	3	Example cover letter to additional authorities
B	4	Statement of Community Consultation Errata Statement
B	5	Published Statement of Community Consultation
<b>Appendix C 2019 Notices</b>		
C	1	Copies of statutory notices
C	2	Section 42 notification letter
C	3	Section 44 notification letter (Cat 1, 2 and 3)
C	4	Section 47 and 48 Notice
C	5	Section 46 letter notifying Secretary of State
C	6	Site notice photos
C	7	Letter notifying Secretary of State of intention to provide an Environmental Statement
C	8	Section 46 notification acknowledgement letter from PINS 2019
<b>Appendix D 2019 Prescribed Consultees</b>		
D	1	List of Prescribed Consultees identified and consulted
<b>Appendix E 2019 Statutory Consultation Materials</b>		
E	1	Information booklet
E	2	Guide to Statutory Consultation
E	3	Feedback form
E	4	Consultation boards

### Appendix F 2019 Publicity

F	1	Newspaper advert highlighting additional Leighton Buzzard DIV
F	2	Newsletter
F	3	Leighton Buzzard event newsletter
F	4	List of locations sent posters
F	5	Poster - A3
F	6	Poster - A4
F	7	Photos of poster in situ
F	8	Newspaper adverts - example of early advert
F	9	Newspaper adverts - example of later advert
F	10	Example photos of advertisements in newspapers
F	11	List of stakeholders contacted including hard to reach groups

### Appendix G 2022 Statutory Consultation Statement of Community Consultation

G	1	Draft Statement of Community Consultation and cover letter
G	2	Note sent to local authorities responding to their comments on the Draft Statement of Community Consultation (SoCC)
G	3	Addendum - responses to comments
G	4	Published Statement of Community Consultation

### Appendix H 2022 Notices

H	1	Email to Dacorum notifying them as host authority
H	2	Email to Three Rivers District Council notifying them as neighbouring authority
H	3	Section 42 notification letters
H	4	Section 47 (6) and 48 Notice
H	5	Letter to additional PILS in May 2022 - Cat 1 and 2
H	6	Letter to additional PILS in May 2022 - Cat 3
H	7	Section 46 letter notifying Secretary of State
H	8	Letter to S42 notifying of update to compensation and need case
H	9	Copies of statutory notices
H	10	Photos of site notices
H	11	Section 44 notification letter (Cat 1 and 2)
H	12	Section 44 notification letter (Cat 3)

### Appendix I 2022 Prescribed Consultees

I	1	List of Prescribed Consultees identified and consulted
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### Appendix J 2022 Statutory Consultation Materials

J	1	Consultation brochure
J	2	Summary and FAQ
J	3	Consultation response form
J	4	Consultation boards

<b>Appendix K 2022 Publicity</b>		
K	1	Newsletter
K	2	List of locations sent posters
K	3	Example poster
K	4	Newspaper advertisement and web banners
K	5	Examples of newspaper advertisements - photos of papers examples
K	6	Newspaper advertisement with new Stevenage date
K	7	Press releases
K	8	Email to stakeholders
K	9	List of stakeholders contacted including hard to reach groups
K	10	Hard to Reach Strategy
K	11	Email to hard to reach groups
<b>Appendix L 2019 Due Regard tables</b>		
L	1	Due regard tables for need case and forecasts; climate change and carbon; noise; flightpaths and fleetmix; air quality; natural environment and landscape; historic environment; and water and drainage
L	2	Due regard tables for employment and economics; design; Wigmore Valley Park; impacts on local communities; passenger experience; surface access; land and compensation; construction and phasing; planning; and consultation
L	3	Due regard tables in response to comments on the PEIR from WSP on behalf of host authorities
<b>Appendix M 2022 Due regard tables</b>		
M	1	Due regard tables for general; need case, economics and employment; GCG; climate change; noise and flight paths
M	2	Due regard tables for fleetmix; air quality; local environment; design; open space/Wigmore Valley Park; and impact on local communities
M	3	Due regard tables for surface access; compensation; construction; planning and consultation and stakeholder engagement
M	4	Due regard tables in response to comments from WSP on behalf of host authorities
<b>Appendix N Additional PILs not consulted</b>		
N	1	Letter to PILs not consulted - Cat 1 & 2
N	2	Letter to PILS not consulted - Cat 3
N	3	List of parties not consulted

## 2 2018 NON-STATUTORY CONSULTATION PROCESS

### 2.1 Introduction

2.1.1 This section describes the process that the Applicant undertook in respect of the 2018 non-statutory consultation.

### 2.2 Purpose of the consultation

2.2.1 The purpose of the 2018 non-statutory consultation was to engage members of the public, stakeholders and local organisations on the Proposed Development. The consultation sought views on:

- a. the potential benefits of expanding the airport;
- b. the options to expand the airport, including:
  - i. the strategy of making best use of the existing runway rather than pursuing an extended, realigned or second runway; and
  - ii. the options for making best use of the existing runway, including the proposal to focus development to the north of the runway and the emerging preference of a two terminal solution (Option 1a);
- c. the key impacts of expansion and how they could be managed and mitigated, including in particular:
  - i. earthworks;
  - ii. public open space;
  - iii. noise;
  - iv. surface access;
  - v. air quality;
  - vi. landscape and visual;
  - vii. heritage; and
  - viii. biodiversity.
- d. many other comments on the expansion proposals and the approach to consultation.

### 2.3 When did the consultation take place?

2.3.1 The 2018 non-statutory consultation ran for nine weeks and five days, from Monday 25 June 2018 to Friday 31 August 2018 inclusive.

### 2.4 Who was consulted?

2.4.1 The local community, host authorities, parish councils in the host authority area, local businesses, landowners and other key stakeholders were consulted. A list of the organisations consulted can be found in **Appendix A**.

## 2.5 Consultation methods

### Consultation materials

2.5.1 Documents published as part of the 2018 non-statutory consultation are described in **Table 2.1** below.

Table 2.1: 2018 non-statutory consultation documents

Consultation document	Overview
London Luton Airport Expansion Project Future LuToN: Consultation Brochure	Explains the proposals which were consulted on, including the four options.
London Luton Airport Expansion Project Consultation Brochure Summary	A summary of the Consultation Brochure.
London Luton Airport Expansion Project Sift 1 Report (draft dated June 2018)	Describes the first stage of the sift process which was an initial appraisal of the long list of options to produce a short list.
London Luton Airport Expansion Project Sift 2 Report (draft dated June 2018)	Describes the second stage of the sift process to appraise the options which remained under consideration after Sift 1.
London Luton Airport Expansion Project Draft Sustainability Strategy – Vision for Sustainable Growth 2020-2050	Describes the vision for sustainable growth at the airport.
Consultation Feedback Form	Contain a series of open and closed questions to capture views.

2.5.2 The materials were available to access at <https://futureluton.llal.org.uk/>.

2.5.3 The Consultation Feedback Form included a combination of questions that asked respondents whether they agreed or disagreed with the proposals, and asked respondents to rank issues in order of importance. It also included text boxes to enable respondents to share in more detail their thoughts on the proposals.

## 2.6 Engagement methods

### Website

2.6.1 A dedicated website was set up for the consultation ([www.futureluton.llal.org.uk](http://www.futureluton.llal.org.uk), this has subsequently been replaced with the Luton Rising website). Members of the public and other interested parties were able to read or download all consultation documents free of charge, complete an electronic Consultation Feedback Form, and find out ways to engage with the consultation process.

2.6.2 The website was promoted by the Applicant via social media, with Facebook being the most viewed method.

## Consultation events

- 2.6.3 Initially, 17 public consultation events over a four-week period were organised across the region. These consultation events enabled members of the public to view and engage with the proposals and meet and ask questions of the project team.
- 2.6.4 Once the consultation was launched, three extra consultation events were added to the programme. Two of these events (in Pitstone and Tring) were organised in response to requests from District Councillors to hold events in their areas following the publication of the consultation timetable. The third additional event was specifically aimed at young people and organised jointly with National Citizen Service.
- 2.6.5 **Table 2.2** lists the events that were held during the consultation period, and the number of attendees. Information on the proposals was displayed on consultation boards. Consultation materials were available to take away in paper form and were also available online.

Table 2.2: 2018 consultation events

Number	Event	Date/time	No. of Attendees
1	University of Bedfordshire, Luton Campus, Vicarage St, Luton LU1 3JU	Monday 9 July, 13:00-20:00	103
2	Oaklands College, The Campus Welwyn Garden City, AL8 6AH	Tuesday 10 July, 14:00-20:00	31
3	Eaton Bray Village Hall, Church Lane, Eaton Bray Dunstable, Bedfordshire, LU6 2DJ	Wednesday 11 July, 14:00-20:00	25
4	Jubilee Centre, Catherine Street, St Albans Hertfordshire AL3 5BU	Friday 13 July, 14:00-20:00	111
5	Hitchin Town Hall, Brand Street, SG5 1HX	Monday 16 July, 14:00-20:00	78
6	The Old Town Hall, High St, Hemel Hempstead, HP1 3AE	Tuesday 17 July, 14:00-20:00	39
7	Southdown Room, Harpenden Public Halls, Southdown Road, AL5 1PD	Wednesday 18 July, 14:00-20:00	225
8	Raynham Community Centre, 66 Eaton Green Road, Luton LU2 9JE	Saturday 21 July, 13:30-16:00	171
9	Ellen Terry Room, 2 <sup>nd</sup> Floor, Stevenage Arts and Leisure Centre, Lytton Way SG1 1LZ	Monday 23 July, 14:00-20:00	66
10	Mead Hall, East Ln, Wheathampstead, St Albans AL4 8BP	Wednesday 25 July, 14:00-20:00	84



Number	Event	Date/time	No. of Attendees
11	The Incuba, 1 Brewers Hill Rd, Dunstable LU6 1AA	Thursday 26 July, 14:00-20:00	20
12	Breachwood Green Village Hall, Chapel Road, SG4 8NX	Friday 27 July, 14:00-20:00	92
13	Flamstead Village Hall, Church Road, AL3 8BN	Saturday 28 July, 13:00-16:30	57
14	Stockwood Discovery Centre, London Road, LU1 7HA	Monday 30 July, 14:00-20:00	241
15	Pitstone Memorial Hall, Vicarage Rd, Pitstone, Leighton Buzzard LU7 9EY*	Tuesday 31 July, 16:00-20:00	58
16	Caddington Sports and Social Club LU1 4HH	Wednesday 1 August, 14:00-20:00	202
17	Whitwell New Fellowship Hall, Bendish Lane, SG4 8HT	Thursday 2 August, 14:00-20:00	52
18	Linslade Community Hall, Waterloo Road, Leighton Buzzard, LU7 2NR	Saturday 4 August, 12:00-16:00	11
19	Nora Grace Hall, Faversham Close, Tring HP23 5BA*	Wednesday 8 August, 16:00-20:00	50
20	Young people's workshop facilitated through the National Citizen Service summer programme*	Thursday 16 August, 10:00-12:30	45

\* Additional event.

## 2.7 Document Inspection Venues

2.7.1 Consultation materials were placed at Document Inspection Venues in the vicinity of the airport. These venues held copies of all consultation documents throughout the consultation period so that members of the public could view them. These venues included libraries and council offices, and are listed in **Table 2.3** below.

Table 2.3: 2018 Document Inspection Venues

Venue	Address
Luton Borough Council	Luton Council, Town Hall, George Street, Luton LU1 2BQ
Central Bedfordshire Council	Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford SG17 5TQ

Venue	Address
North Hertfordshire District Council	North Hertfordshire District Council, Council Offices, Gernon Road, Letchworth Garden City SG6 3JF
Hertfordshire County Council	Hertfordshire County Council, County Hall, Pegs Lane, Hertford SG13 8DQ
Luton Central Library	Luton Central Library, St George's Square, Luton LU1 2NG
St Albans Library	St Albans Library, The Maltings, St Albans AL1 3JQ
Stevenage Library	Stevenage Library, Southgate, Stevenage SG1 1HD
Dunstable Library	Dunstable Library, Vernon Place, Dunstable LU5 4HA
Hitchin Library	Hitchin Library, Paynes Park, Hitchin SG5 1EW
Stopsley Library	Stopsley Library, 598 Hitchin Road, Luton LU2 7UN
Leagrave Library	Leagrave Library, Marsh Road, Luton LU3 2NL
Harpenden Library	Harpenden Library, 27 High Street, Harpenden AL5 2RU
Welwyn Library	Welwyn Library, Civic Centre, Prospect Place, Welwyn AL6 9ER
Hemel Hempstead Library	Hemel Hempstead Library, The Forum, Marlowes, Hemel Hempstead HP1 1DN

## 2.8 Publicity

2.8.1 The following measures were used to promote the non-statutory consultation.

### Local media coverage

2.8.2 Adverts promoting the non-statutory consultation were placed in local and regional newspapers throughout the consultation period, including on digital editions where possible. These newspapers were:

- a. Bedford Times and Citizen;
- b. Bucks Free Press;
- c. Bucks Herald;
- d. Dunstable Today;
- e. Hemel Hempstead Gazette;
- f. Herts Advertiser;
- g. Hitchin Comet;
- h. Leighton Buzzard Observer;
- i. Letchworth Comet;
- j. Luton Herald and Post;
- k. Luton News;
- l. Milton Keynes Citizen;

- m. Stevenage Comet;
- n. St Albans and Harpenden Review; and
- o. Welwyn and Hatfield Time.

2.8.3 The adverts detailed the timetable and location of events and contact details. A copy of the advert and photographs of examples of the adverts in newspapers can be found in **Appendix A**. A later version of the advert publicised the additional events in Pitstone and Tring. The third additional event was organised by National Citizen Service and as such there was no need for additional publicity by the Applicant.

### **Posters**

2.8.4 Posters that described the consultation and the events were distributed to local authorities and organisations ahead of the consultation events. The posters included the same detail as the advert as well as how to provide feedback on the proposals. A copy of the poster can be found in **Appendix A**.

2.8.5 During the first week of the event programme, in response to feedback from attendees, additional posters were placed in public spaces, including on Parish Council noticeboards in neighbouring areas.

### **Direct mail and email**

2.8.6 Flyers and letters were used to raise awareness of the consultation including the event programme and how to get involved. These included:

- a. a double sided A5 flyer that was hand-delivered to 39,029 addresses; and
- b. 39,783 letters that were sent via Royal Mail.

2.8.7 A copy of the letter and flyer can be found in **Appendix A**. **Figure 2.1** below illustrates the area sent a flyer or letter.

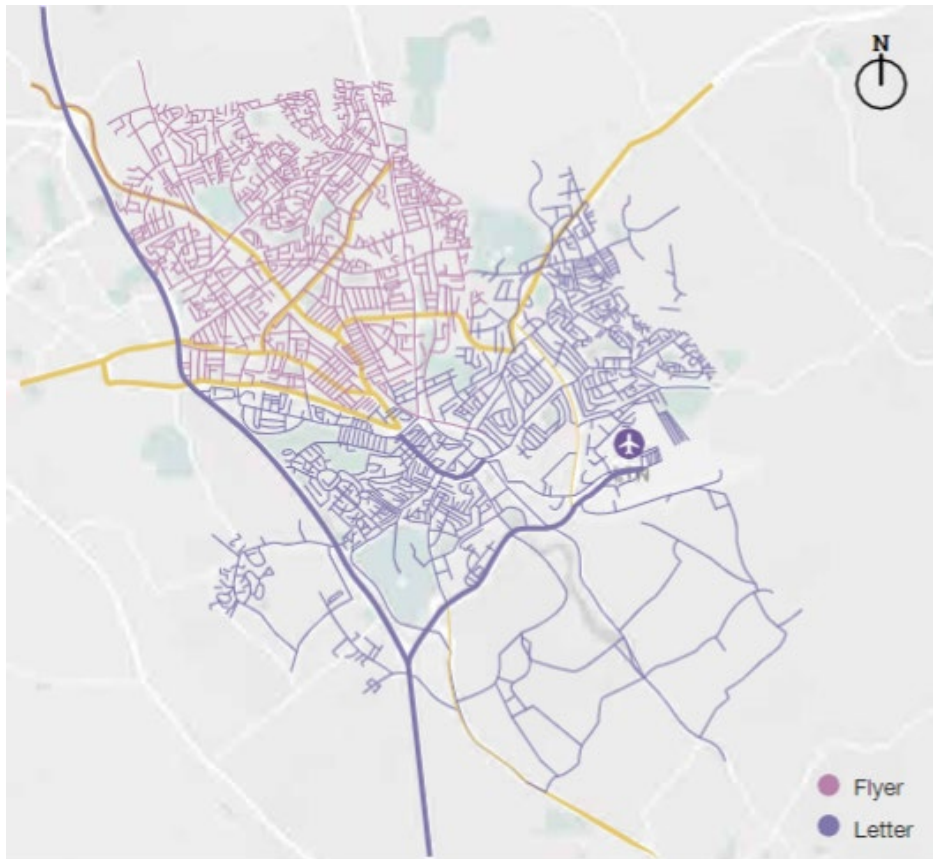


Figure 2.1: Area sent a flyer or letter

2.8.8 Over 600 organisations were sent an email at the start of consultation informing them of the consultation and how they could engage. An email was also sent to the same list towards the end of the consultation period reminding them of the deadline for responding. Emails were sent to host authorities, parish councils in the host authority area, regional Members of Parliament, local businesses, local and regional community groups and other key stakeholders. A list of the organisations emailed, along with a copy of the emails sent at the start and end of consultation, can be found in **Appendix A**.

2.8.9 People with a land interest inside the Order Limits were also sent a letter informing them of the consultation and how they can engage. In total 138 letters were sent to landowners. A copy of the letter sent to landowners can be found in **Appendix A**.

**Ad van**

An advert was placed on an ‘ad van’ which spent seven days during the first week of the consultation period touring the locations listed within **Table 2.4**.

Table 2.4: Location of ‘ad van’

Date	Location
Wednesday 27 June 2018	Luton
Thursday 28 June 2018	St Albans/Hemel Hempstead

Friday 29 June 2018	Leighton Buzzard
Saturday 30 June 2018	Stevenage
Sunday 1 July 2018	Dunstable
Monday 2 July 2018	Harpenden/Welwyn
Tuesday 3 July 2018	Luton

## 2.9 Local authority engagement

2.9.1 The POCG and wider group had not been established formally at the start of the 2018 non-statutory consultation, however regular meetings with officers from each of the organisations in the wider group did take place. Officers from local authorities included in the subsequent wider group were invited to attend a briefing on 22 June 2018 explaining the purpose and scope of the 2018 non-statutory consultation and how they could engage. This meeting was attended by representatives from the following local authorities:

- a. East Hertfordshire District Council;
- b. Central Bedfordshire District Council
- c. Hertfordshire County Council;
- d. LBC;
- e. North Hertfordshire District Council; and
- f. St Albans District Council.

2.9.2 A copy of the notes from this meeting can be found in **Appendix A**.

## 2.10 Feedback

2.10.1 A variety of feedback channels were available to encourage participation. Feedback could be provided by completing the Consultation Feedback Form in hard copy at one of the events or by post, and the form could also be completed online. Comments were also accepted in letter and email form.

## 3 2019 STATEMENT OF COMMUNITY CONSULTATION

### 3.1 Introduction

3.1.1 In accordance with s.47 of the Act, Statements of Community Consultation (SoCC) were prepared for the 2019 and 2022 statutory consultations. This section sets out the process for the 2019 SoCC. Equivalent information for the 2022 SoCC can be found in **Section 5**.

### 3.2 Consultation on the SoCC

3.2.1 The objective of the SoCC was to set out how the Applicant proposed to consult about the proposed application for development consent with people living in the vicinity of the land. The SoCC described a range of engagement methods.

3.2.2 The Proposed Development is located within the geographical boundaries of five host authorities (as defined under Section 43(1) of the Act) who were all consulted on the draft SoCC:

- a. Central Bedfordshire Council
- b. Hertfordshire County Council;
- c. LBC;
- d. Dacorum Borough Council<sup>1</sup>; and
- e. North Hertfordshire District Council.

3.2.3 Since the nature of airport expansion proposals generate issues of more than a local significance, the Applicant also consulted a wider group of “neighbouring” local authorities on the SoCC as defined by Section 43(2). This included:

- a. Barnet Council;
- b. Bedford Borough Council;
- c. Buckinghamshire Council;
- d. Cambridgeshire County Council;
- e. East Hertfordshire District Council;
- f. Enfield Council;
- g. Essex County Council;
- h. Harrow Council;
- i. Hillingdon Council;
- j. Huntingdonshire District Council;
- k. Milton Keynes Council;

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<sup>1</sup> Dacorum Borough Council were identified as a host authority shortly before the 2022 statutory consultation. They were consulted on the 2019 SoCC as a neighbouring authority rather than a host authority, however the approach to consultation did not vary between host and neighbouring authorities and all responses were considered.

- l. South Cambridgeshire District Council;
- m. St Albans City & District Council;
- n. Stevenage Borough Council;
- o. Uttlesford District Council; and
- p. Welwyn Hatfield Borough Council.

3.2.4 Consultation on the draft SoCC took place between 13 June 2019 and 17 July 2019 (34 days in total). A copy of the draft SoCC and its covering letter is contained in **Appendix B**.

3.2.5 The draft SoCC issued to local authorities for consultation erroneously omitted two planned consultation events at Breachwood Green and Redbourn. A draft SoCC errata statement was therefore issued to all local authorities on 19 June 2019. A copy of the errata statement can be found in **Appendix B**.

### 3.3 Outcomes of the SoCC consultation

3.3.1 In total 11 local authorities responded to the consultation on the SoCC. This included responses from all five host authorities. All comments were carefully considered and responses to each point raised are presented in **Table 3.1** below.

3.3.2 The following key changes were made to the draft SoCC in response to consultation responses received:

- a. the number of consultation events was increased from 28 to 36;
- b. the number of Document Inspection Venues was increased from 22 to 31;
- c. the consultation period was extended by five days with the end date changing from 11 December 2019 to 16 December 2019; and
- d. the newsletter mailing zone was expanded so that it better reflected noise contours that would likely arise from the Proposed Development and include areas within a 1km radius of the consultation events.

3.3.3 A summary of the responses received and how they were taken into account is set out in **Table 3.1**.

3.3.4 A copy of the final SoCC can be found in **Appendix B**.

Table 3.1: Summary of consultation on 2019 draft SoCC and regard had to responses received

Local Authority	Summary of responses received	Regard had to the responses
Buckinghamshire County Council and Aylesbury Vale District Council	Suggestion to clarify the level of influence respondents will have on the Proposed Development.	Text re-drafted to clarify level of influence, with the SoCC stating <i>“this is a consultation on the proposals that we will put</i>

Local Authority	Summary of responses received	Regard had to the responses
		<p><i>forward to PINS for consideration, and how we will avoid and mitigate any impacts.”</i> The consultation material and Consultation Feedback Form sought to make it clear what people could and could not influence by responding.</p>
	<p>The heat map illustrating responses to the non-statutory consultation shows a high concentration of respondents located to the south east of Aylesbury Vale, which is likely to correspond with the existing westerly flightpaths. Therefore, additional consultation events should be included here, e.g. in Aston Clinton and Wendover.</p>	<p>An additional event was included in Wendover to cover this area.</p>
	<p>Suggestion to increase the proposed leaflet distribution area radius from consultation venues.</p>	<p>The radius of the newsletter delivery around consultation venues was increased to 1km.</p>
	<p>Suggest that only one of the council offices in Aylesbury used as an inspection location. Propose a second inspection location in the South of the Vale, with suggested venue being Wendover Library.</p>	<p>Both Council offices remained as Document Inspection Venues, but Wendover Library was added as an additional Document Inspection Venue.</p>
	<p>Suggestion to hold joint briefings between Aylesbury Vale District Council/Buckinghamshire County Council members and officers to streamline engagement and enable a collective briefing of all relevant members.</p>	<p>It was not necessary to prescribe local authority briefings within the SoCC. Nevertheless, engagement with the local authorities was undertaken in advance of, and during, the consultation period.</p>
	<p>Open-ended questions alone may not assist the residents feeling that their responses to questions have been appropriately considered against the trade-offs of expansion.</p>	<p>This comment was taken on board in the design of the consultation material and Consultation Feedback Form.</p>



Local Authority	Summary of responses received	Regard had to the responses
	<p>Wider relevant stakeholders who may be impacted by the expansion should be identified within the SoCC, such as the Chilterns Conservation Board and National Trust properties.</p>	<p>It was not necessary to identify stakeholders in the SoCC. Nevertheless these organisations were consulted in accordance with the requirements of the Act.</p>
	<p>Suggestion to include the offer of audio formats, as well as alternative print formats.</p>	<p>The suggestion to provide audio formats was considered, however was considered to be unfeasible. Alternative print formats were available upon request.</p>
<p>Buckinghamshire County Council</p>	<p>Suggestion to include an additional Document Inspection Venue at Beacon Villages Library in Ivinghoe.</p>	<p>Beacon Villages Library in Ivinghoe was added as a Document Inspection Venue.</p>
<p>Central Bedfordshire Council</p>	<p>Clarify the meaning of 'Host Authority'.</p>	<p>Text was re-drafted to clarify this.</p>
	<p>Shortlist options for the expansion should be clarified to demonstrate the process of developing the proposals.</p>	<p>Text was re-drafted to clarify the process for developing the Proposed Development including the consultation. Further information on the options was included in the consultation materials.</p>
	<p>Extend consultation period from 8 weeks to 10 weeks to match previous early engagement [this is assumed to be the 2018 non-statutory consultation which ran for nine weeks and five days.</p>	<p>The consultation period was extended by five days; it closed on 16 December 2019 rather than 11 December 2019. The Act requires the consultation period to run for a minimum of 28 days. The 2019 statutory consultation ran for 62 days, which was considered to be ample time for the public to consider the Proposed Development.</p>

Local Authority	Summary of responses received	Regard had to the responses
	Correct the reference of Document Inspection Venues.	Text was re-drafted to amend this.
	Expand on Wigmore Valley Park proposals, including the process if, and when the DCO is made (i.e. how the next stage is dealt with, and who by).	The draft and published SoCC both included links and information about the DCO process. However, it was not appropriate to provide detailed information about the scheme itself in the SoCC. This information was available as part of the materials published for consultation.
	Include costs for the documents available for purchase, as well as timescales for delivery.	The cost of having a full set of documents printed was added to the SoCC (£260). Timescales were not included as this was considered to be detailed information which would be dependent on the nature of any request.
	Improve clarity of maps of event locations.	All maps included within the published SoCC were re-designed to ensure clarity.
	The event listed as Dunstable is actually located within Houghton Regis which is supported, however, the text needs to be amended. Also propose an additional consultation event in Dunstable.	Text was re-drafted to correct this, and an additional consultation event was added at Dunstable Conference Centre.
	An additional event should be held in Leighton Buzzard to attract residents from surrounding villages.	An additional consultation event was held in Leighton Buzzard. However, this was not organised until after the publication of the final SoCC. An additional newsletter was sent to 17,690 addresses on 14 November 2019 providing information on the

Local Authority	Summary of responses received	Regard had to the responses
		additional Leighton Buzzard event.
	Request that the consultation events held in Caddington and Slip End are staggered, to enable as many people in the area to attend one of the events as possible.	As requested, the Caddington event was held towards the start of the consultation period (31 October 2019) and the Slip End event was held at the end (7 December 2019).
	The address of the consultation event proposed to be held at Dunstable Library will need to be amended as this has recently changed.	Text was re-drafted to correct the address.
	Proposals for an additional Document Inspection Venue at Central Bedfordshire Council offices.	This additional Document Inspection Venue was added.
	There should be additional public notices included in the Biggleswade Comet and Leighton Buzzard Observer.	The Leighton Buzzard Observer was added to the list of publications to include a public notice. The Biggleswade Comet ceased in December 2018. However, the Biggleswade Chronicle was included.
	There should be an Appendix which states the Parishes which will receive packs of posters to put on their local noticeboards.	This was not included, as all parishes within the Host Authorities received posters.
	Studham, Hyde and Kensworth should be added to the leaflet distribution areas to more appropriately reflect the noise contour and ensure those most affected are directly consulted.	The newsletter mailing zone was increased to better reflect the noise contours and as a result these three locations were included.
	Suggestion to tailor some engagement efforts on the traveller communities, with suggestion that face-to-face engagement has been successful in the past.	The SoCC was updated to include a section on engagement with traveller communities.

Local Authority	Summary of responses received	Regard had to the responses
	Suggestion to include the Central Bedfordshire Home Library Service as a Document Inspection Venue.	This was added an additional Document Inspection Venue.
	Suggestion for detail to be included around timescales for delivery of requests for the SoCC in alternative document formats, to ensure no individual is disadvantaged if delays are experienced.	Timescales were not included as this was considered to be detailed information which would be dependent on the nature of any request.
	Include blank copies of the feedback forms alongside the consultation material within Document Inspection Venues.	The SoCC was updated to confirm that copies of all consultation documents, which includes the Feedback Form, would be available at the Document Inspection Venues.
	Suggestion of an extension to the leaflet distribution area, further to the West of Luton, to include more of Central Bedfordshire, particularly Studham.	The leaflet distribution area was extended to include this area.
	Suggestion for text to be amended on Page 20 to refer to Unitary Authorities.	Text was amended.
	Suggestion for text to be amended on Page 22 to refer to the Equalities Act 2010.	It was not necessary to refer to this within the SoCC.
Dacorum Borough Council	There are a number of duplications within the list of newspapers which will include public notices.	Text was amended.
Hertfordshire County Council	Suggestion to redraft text with more accessible, user-friendly language, to be able to be understood by all, as well as the provision of a glossary.	Text was re-drafted throughout the SoCC to use less technical language.
	Suggestion to refer to the Scheme Boundary within Appendix 1.	Text was amended.
	Suggestion to expand on and explain what the 'statutory criteria' for consultation are.	Text was re-drafted.
	Clarify the meaning of 'Host Authority'.	Text was re-drafted to clarify this.

Local Authority	Summary of responses received	Regard had to the responses
	Suggestion to be more specific than 'given the nature of the scheme' and highlight why the scheme generates issues of more than local significance, e.g. noise, surface access, employment, and the economy etc.	Text was re-drafted.
	There will be a substantial amount of material available as part of the consultation, and the scale of which will make it challenging to many parties wishing to engage in the process. Suggestions to extend the proposed 8-week period to 10 or even 12 weeks.	The consultation period was extended by five days, closing on 16 December 2019 rather than 11 December 2019. The Act requires the consultation period to run for a minimum of 28 days. The 2019 statutory consultation ran for 62 days, which was considered to be ample time for the public to consider the Proposed Development.
	Suggestion to re-word section on purpose of consultation to encourage people to respond, whether or not they support the Proposed Development.	Text was re-drafted.
	'Due to the size of these documents, copies can be purchased on request'. This statement would benefit from clarification – this presumably being that providing documents free of charge would represent an unreasonable cost to the Applicant.	Text was re-drafted, to include the cost of having the full set of documents printed (£260). Some consultation documents (the Guide to Statutory Consultation, Information Booklet, SoCC and Feedback Form) were available free of charge at the events and on request.
	Suggestion to include an additional Document Inspection Venue at Marshalswick Library.	Marshalswick Library was added as an additional Document Inspection Venue.
	Include a commitment to actively engage with representative	It was not necessary to include reference to these

Local Authority	Summary of responses received	Regard had to the responses
	<p>organisations, such as Harpenden Sky, Luton And District Association for the Control of Aircraft Noise, St Albans Quieter Skies, Stop Low Flights from Luton, Stop Luton Airport Expansion, St Albans Aircraft Noise Defence, etc.</p>	<p>specific organisations in the SoCC, however, each of these organisations were contacted at the start of consultation.</p>
	<p>Suggestion to allow for feedback by e-mail, writing, and Freepost.</p>	<p>These were all included as methods to receive feedback.</p>
	<p>It would be helpful if the SoCC could make a commitment to explain to consultees through all consultation/feedback mechanisms how responses are to be analysed and the results of the analysis presented.</p>	<p>The Next Steps section of the SoCC was updated to set out how feedback would be analysed and reported.</p>
LB Barnet	<p>Provide information on the impact of flights and flightpaths on Barnet.</p>	<p>This additional information was not published within the SoCC. However, it was part of the materials made available within consultation.</p>
LB Hillingdon	<p>Add consultation event within Hillingdon.</p>	<p>No additional consultation event was included because this area was outside the area likely to be directly affected by the Proposed Development. This was confirmed in writing to LB Hillingdon prior to the publication of the SoCC.</p>
	<p>Flightpath information and subsequent impacts on Hillingdon, RAF Northolt, and cumulative effects with current and proposed effects of Heathrow to be published.</p>	<p>This additional information was not published within the SoCC. However, it was part of the materials made available within consultation.</p>
LBC	<p>Formal consultation should be for ten weeks, rather than the minimum eight weeks.</p>	<p>The consultation period was extended by five days, closing on 16 December 2019 rather than 11 December 2019.</p>

Local Authority	Summary of responses received	Regard had to the responses
		<p>The Act requires the consultation period to run for a minimum of 28 days. The 2019 statutory consultation ran for 62 days, which was considered to be ample time for the public to consider the Proposed Development.</p>
	<p>There should be an appendix that shows the project as a whole with the various elements of the Proposed Development annotated.</p>	<p>The purpose of the SoCC was to publicise the consultation methodology. The requested information was provided in the consultation material.</p>
	<p>Set out London Luton Airport Limited’s objectives for expansion, but there is no indication in this consultation how the proposed expansion will result in the airport becoming a better neighbour for local communities.</p>	<p>The purpose of the SoCC was to publicise the consultation methodology. The requested information was provided in the consultation material.</p>
	<p>The description of the DCO process may be too technical for the lay person and we suggest that more thought is given to how this is set out within the document.</p>	<p>Text was re-drafted throughout the SoCC to use less technical language.</p>
	<p>Explain what the ‘statutory criteria’ are that the pre-application consultation needs to meet.</p>	<p>Text was re-drafted.</p>
	<p>The term ‘decision makers’ is not clear, replace it with Secretary of State.</p>	<p>Text was re-drafted.</p>
	<p>State when the PEIR will be produced, publicised, and made available for comment.</p>	<p>Text was re-drafted to clarify that the PEIR was part of the consultation material.</p>
	<p>Include text to state how the Proposed Development took non-statutory consultation into account.</p>	<p>The purpose of the SoCC was to publicise the consultation methodology. This information was</p>
	<p>Suggestion to include a brief summary of the feedback to the 2018</p>	

Local Authority	Summary of responses received	Regard had to the responses
	<p>non-statutory consultation and not rely on the reader having to look elsewhere.</p>	<p>included in the consultation material.</p>
	<p>The Council’s Communications team was concerned that the ‘layered set-up’ will put people off engaging, could lead to them considering that the proposed expansion is a given and therefore any comments they make will be ignored, and if no alternatives are put forward in the consultation this will again reinforce the opinion that a decision has been made and their engagement is meaningless.</p>	<p>Text was re-drafted to clarify level of influence, with the SoCC stating “<i>this is a consultation on the proposals that we will put forward to PINS for consideration, and how we will avoid and mitigate any impacts.</i>” The consultation material and feedback form sought to make it clear what people could and could not influence by responding</p>
	<p>Make clear that the materials that address issues and topics will be both at the exhibitions and in the formal consultation documents.</p>	<p>Text was re-drafted.</p>
	<p>SoCC should indicate the key issues in the feedback form.</p>	<p>The SoCC covered the main issues and topics in the consultation material.</p>
	<p>Feedback form should include opportunities to provide general comments that are not constrained by pre-set questions.</p>	<p>This comment was taken on board in the design of the consultation material and feedback form.</p>
	<p>Expand on how those who make representations may participate in the examination process, including potential chronology of events.</p>	<p>SoCC signposts people to this information on the Planning Inspectorate website.</p>
<p>North Hertfordshire District Council</p>	<p>The Mrs Howard Memorial Hall would be a more suitable location than the Broadway Hotel.</p>	<p>This was considered but the venue was not changed due to availability and cost.</p>
	<p>Leaflets should also be distributed in the following Parishes; Offley &amp; Cockernhoe; Liley; Hexton; Kings Walden; St Pauls Walden; Preston; Langley; St Ippolyts; Kimpton; Knebworth and Wymondley.</p>	<p>All parishes identified by North Hertfordshire District Council were included within the amended newsletter mailing zone</p>



Local Authority	Summary of responses received	Regard had to the responses
	Appendix 2 should reflect the addition of consultation events at Breachwood Green and Redbourn and the listed event at Whitwell should be updated to show where leaflets will be distributed in these locations.	The published SoCC included Breachwood Green and Redbourn events. Leaflets were distributed across the newsletter mailing zone which was expanded to include 1km area around each event.
St Albans City & District Council	Suggestion to increase the leaflet distribution area.	The radius of the newsletter delivery around consultation venues was increased to 1km.
	Suggestion to commit to more public surgeries and community engagement events, with public surgeries and workshops be held at times outside the working day to allow all those affected to attend.	The number of consultation events was increased from 28 to 36. At each event project team members were available to answer questions from members of the31his31oc. Some events were held at weekends and others in the evening.
Stevenage Borough Council	The Council is concerned that the venue chosen does not allow for maximum accessibility by all members of the community. A venue within the town centre (accessible from the train and bus stations) would be significantly more accessible, which would hopefully enable more people to get involved. We would request that the choice of venue is reconsidered. The Arts and Leisure Centre has worked well for previous consultation events.	The venue was changed to the Stevenage Arts and Leisure Centre and this was reflected in the SoCC.
	Suggestion for Stevenage Old Town Library to be added as a Document Inspection Venue.	Stevenage Old Town Library was added as an additional Document Inspection Venue.
	Suggestion for further detail to be provided on which locations will be targeted for leaflet distribution areas, and for Stevenage Borough Council	Leaflets were distributed to the newsletter zone which was described in the SoCC. Engagement

Local Authority	Summary of responses received	Regard had to the responses
	to be given the opportunity to review the list of locations in advance of the consultation start date.	with Stevenage Borough Council continued after the consultation on the SoCC and they were therefore able to provide comments on the mailing zone included in the updated SoCC.

### 3.4 Publicising the SoCC

3.4.1 In accordance with Section 47(6)(a) of the Act newspaper notices were published setting out where and when the SoCC could be inspected. In addition to meeting the requirements of Section 47 of the Act, the same notice was used to publicise the proposed application for development consent in accordance with Section 48 of the Act and Regulation 4 of APFP Regulations 2009.

3.4.2 **Table 3.2** sets out the newspapers and dates on which the notices were published. Notices were published in accordance with the approach set out in the SoCC. Copies of the notices can be found in **Appendix C**.

Table 3.2: Newspapers with published notices of 2019 statutory consultation

Newspaper	Date of notification publication
The Times	8 October 2019
The London Gazette	8 October 2019
Barnet Borough Times	17 October 2019 and 24 October 2019
Biggleswade Chronicle	11 October 2019 and 18 October 2019
Bucks Free Press	11 October 2019 and 18 October 2019
Bucks Herald	9 October 2019 and 16 October 2019
Cambridge News	8 October 2019 and 15 October 2019
Dunstable Gazette	9 October 2019 and 16 October 2019
Harrow Times	10 October 2019 and 17 October 2019
Hemel Hempstead Gazette	9 October 2019 and 16 October 2019
Hertfordshire Mercury	10 October 2019 and 17 October 2019
Herts Advertiser	10 October 2019 and 17 October 2019
Hitchin Comet	10 October 2019 and 17 October 2019
Hunts Post	9 October 2019 and 16 October 2019
Leighton Buzzard Observer	8 October 2019 and 15 October 2019
Letchworth & Baldock Comet	10 October 2019 and 17 October 2019

Newspaper	Date of notification publication
Luton & Dunstable Herald & Post	10 October 2019 and 17 October 2019
Luton News	9 October 2019 and 16 October 2019
Milton Keynes Citizen	10 October 2019 and 17 October 2019
Royston Crow	10 October 2019 and 17 October 2019
Stevenage Comet	10 October 2019 and 17 October 2019
Watford Observer	11 October 2019 and 18 October 2019
Welwyn & Hatfield Times	9 October 2019 and 16 October 2019

3.4.3 The SoCC was published at the start of the consultation period on 16 October 2019 and was made available for the duration of the consultation period. It was available free of charge on the dedicated consultation website ([www.futureluton.llal.org.uk](http://www.futureluton.llal.org.uk)) and hard copies or USB sticks were available upon request. It was also available to view at the Document Inspection Venues and at the consultation events.

### 3.5 Compliance with the SoCC

3.5.1 Section 47(7) of the Act requires the Applicant to carry out consultation in accordance with the proposals set out in the SoCC. The SoCC outlined how the Applicant was going to consult those living in the vicinity of the Proposed Development including residents, interest groups, businesses and airport users.

3.5.2 Consultation was undertaken in accordance with the SoCC, however some additional activities were undertaken, as described below:

- a. in response to requests during consultation, an additional event was held at Leighton Buzzard on 22 November 2019. This event took the same format as all other events. Refer to **Section 4** for further information on how the 2019 consultation was undertaken. Additional pop-up events were also held at The Mall in Luton, the University of Bedfordshire, Inspire Luton (leisure centre), the EasyJet hangar, Luton Town Hall and the airport terminal.
- b. the 2019 SoCC stated that the Applicant would share press releases with journalists and facilitate coverage in national and local media – print, radio, and television. The press release can be found in **Appendix B**. This was undertaken in accordance with the SoCC. Additionally during the consultation, radio adverts were produced and played on local radio stations, this was therefore over and above the approach set out the SoCC.
- c. postcards containing a short overview of the Proposed Development with a space to provide comments were distributed to places of worship, council buildings, community centres and children’s centres during the consultation to facilitate participation from underrepresented groups.

## **4 2019 STATUTORY CONSULTATION PROCESS**

### **4.1 Introduction**

4.1.1 This section describes the process that the Applicant undertook in respect of the 2019 statutory consultation.

### **4.2 Purpose of the consultation**

4.2.1 The aim of the 2019 statutory consultation was to gather views from the local community, Prescribed Consultees, local authorities, Persons with an Interest in the Land (PILs), the wider public and anyone else with an interest in the Proposed Development in order to inform the development of proposals.

4.2.2 Views were specifically sought on:

- a. the reasons the airport needs to expand;
- b. the proposed layout of the expanded airport;
- c. the proposed new airfield infrastructure;
- d. the proposed new terminal and supporting infrastructure;
- e. the proposals for how people will access the airport by public transport and road;
- f. the proposed phasing of construction;
- g. proposals for how the Applicant will be a good neighbour during the construction process;
- h. proposals for managing and mitigating the effects of the Proposed Development; and
- i. proposals for land acquisition and compensation.

### **4.3 When did the consultation take place?**

4.3.1 The 2019 statutory consultation took place for a period of just over eight weeks, between 16 October 2019 and 16 December 2019 inclusive.

### **4.4 Newsletter mailing zone**

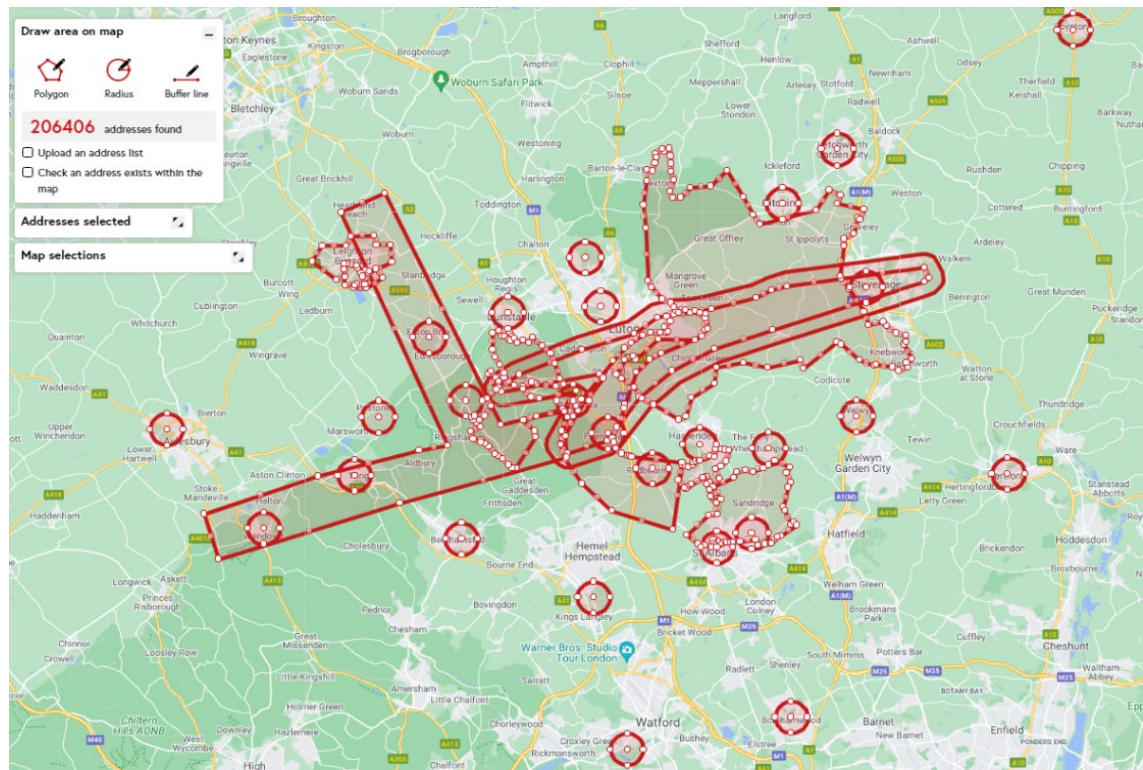
4.4.1 Consultation was not geographically restricted to a specific area, with the consultation open to anyone who wanted to respond.

4.4.2 However, a newsletter mailing zone was established in a defined area around the airport to notify those likely to be directly affected by the Proposed Development. The newsletter mailing zone was based on:

- a. a pre-defined mailing area around the airport with a 1km buffer;
- b. an additional noise route which aligns with the westerly noise preferential route;
- c. an additional area to include specific wards close to the airport;

- d. areas within 1km of a 2019 event location (refer to Section 4.6 for more information on consultation events).

4.4.3 The spatial extent of the newsletter mailing zone, is in accordance with the 2019 SoCC, and shown on Figure 4.1. All properties within the red areas were sent a newsletter notifying them about the consultation.



Source: Lbox mailing company

Figure 4.1: 2019 newsletter mailing zone

## 4.5 Who was consulted?

4.5.1 Under the requirements of the Act, consultation was held with particular stakeholders and groups, as outlined in Sections 42 and 47. Under Section 42 of the Act, the following groups were consulted:

- a. Prescribed Consultees (Section 42(1)(a));
- b. Local Authorities (Section 42(1)(b)); and
- c. PILs (Section 42(1)(d)).

### *Prescribed Consultees (Section 42)*

4.5.2 Prescribed Consultees are listed in Schedule 1 of APFP Regulations 2009, **Table 4.1** and **Table 4.2** below provides a list of the Prescribed Consultees and relevant statutory undertakers consulted as part of the 2019 statutory consultation. Further information about these organisations including why they were consulted and contact information can be found in **Appendix D**.

Table 4.1: 2019 Prescribed Consultees

<b>Schedule 1 Description (Ref 5)</b>	<b>Organisation</b>
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS East and North Hertfordshire Clinical Commissioning Group
	NHS Luton Clinical Commissioning Group
	NHS Bedfordshire Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Hertfordshire Fire and Rescue Service
	Bedfordshire and Luton Fire and Rescue Service
The relevant police and crime commissioner	Police and Crime Commissioner for Bedfordshire
	Police and Crime Commissioner for Hertfordshire
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	King's Walden Parish Council
	Offley Parish Council
	St Ippolyts Parish Council
	Hyde Parish Council
	Slip End Parish Council
The Environment Agency	The Environment Agency
The relevant Area of Outstanding Natural Beauty (AONB) Conservation Boards	Chilterns Conservation Board
Homes and Communities Agency	Homes England
The Civil Aviation Authority	Civil Aviation Authority
Secretary of State for Transport	Secretary of State for Transport
Integrated Transport Authorities	Transport Focus
The Relevant Highways Authority	LBC
	Central Bedfordshire Council
	Hertfordshire County Council
	Bedford Borough Council
	Milton Keynes Council
	Cambridgeshire County Council
	Essex County Council
	Buckinghamshire Council

<b>Schedule 1 Description (Ref 5)</b>	<b>Organisation</b>
	Harrow London Borough Council
	Hillingdon London Borough Council
	Barnet London Borough Council
	Enfield London Borough Council
	Mayor of London
The relevant strategic highways company	Highways England – East
Transport for London	Transport for London
The relevant internal drainage board	Bedford Group of Internal Drainage Boards
Public Health England, an executive agency of the Department of Health	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission – East and East Midlands
The Secretary of State for Defence	Ministry of Defence

Table 4.2: 2019 relevant statutory undertakers

<b>Statutory Undertaker (Ref 6)</b>	<b>Organisation</b>
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
The relevant water and sewage undertaker	Affinity Water
	Thames Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
Murphy Gas Networks limited	

Statutory Undertaker (Ref 6)	Organisation
	Quadrant Pipelines Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
The relevant electricity distributor with Compulsory Purchase Order (CPO) Powers	Eclipse Power Network Limited
	Energetics Electricity Limited
	Energy Assets Networks Limited
	Energy Assets Power Networks Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
UK Power Networks Limited	

### ***Local authorities***

4.5.3 The Proposed Development is located within the geographical boundaries of five host authorities (as defined under Section 43(1) of the Act) who were all notified of the consultation:

- a. Central Bedfordshire Council
- b. Hertfordshire County Council;
- c. LBC;
- d. Dacorum Borough Council<sup>2</sup>; and
- e. North Hertfordshire District Council.

4.5.4 In addition, in accordance with Section 43(1) of the Act the following neighbouring authorities were also notified of the consultation:

- a. Aylesbury Vale District Council;
- b. London Borough of Barnet;
- c. Bedford Borough Council;

<sup>2</sup> Dacorum Borough Council were consulted as a neighbouring authority in 2019, however a very small area of highway works was located within the local authority boundary and they should therefore have been consulted as a host authority. This consequently means that Three Rivers District Council should have been consulted as a neighbouring authority, however they were not consulted in 2019.



- d. Buckinghamshire County Council;
- e. Cambridgeshire County Council;
- f. East Hertfordshire District Council;
- g. London Borough of Enfield;
- h. Essex County Council;
- i. London Borough of Harrow;
- j. London Borough of Hillingdon;
- k. Huntingdonshire District Council;
- l. Milton Keynes Council;
- m. South Cambridgeshire District Council;
- n. St Albans City and District Council;
- o. Stevenage Borough Council;
- p. Uttlesford District Council; and
- q. Welwyn Hatfield Borough Council.

### ***Persons with Interest in the Land***

4.5.5 Under Section 42(1)(d) of the Act, an applicant must consult each person who is within one or more of the following categories set out in Section 44 of the Act. These PILs are defined as the following:

- a. Category 1 includes all owners, lessees, tenants (whatever the tenancy period) and occupiers of the land within the Proposed Development area (“Order limits”);
- b. Category 2 includes all persons with an interest in the land or have the power to sell, convey or release the land within the Order limits; and
- c. Category 3 includes all persons that the applicant thinks that, if the order sought by the application for development consent were made and fully implemented, the person would or might be entitled to make a relevant claim for compensation under Section 10 of the Compulsory Purchase Act 1965 (Ref 7), Part 1 of the Land Compensation Act 1973 (Ref 8) or Section 152 of the Act. This comprises persons with land interests within and outside the Order limits.

4.5.6 Due to the absence of final Order Limits, or survey information identifying where any significant effects might be felt, land referencing limits for the Proposed Development were set to the widest extent that the Applicant considered parties may have a relevant claim for compensation.

4.5.7 The land referencing limits for consultation by the Applicant were identified as follows:

- a. all interests in the draft Order limits (freeholders, leaseholders, tenants, occupiers, rights, beneficiaries, mortgagees etc. of all land and property). The Land Referencing Limits were determined with reference to the land

interests that may be directly affected by the exercise of the compulsory acquisition powers sought in the **draft DCO [TR020001/APP/2.01]**.

- b. All relevant interests identified as having a potential claim for compensation under Section 10 of the Compulsory Purchase Act 1965 or Section 152 of the Act.
- c. All relevant interests identified as having a potential claim for compensation under Part 1 of the Land Compensation Act 1973. These were identified as being owner occupiers of all residential, commercial and agricultural units within a calculated noise contour for operational airport activity in 2043. The contours representing a noise impact of 51dB during the night were used, with a 200m buffer added to include adjacent properties and receptors. These were considered by the Applicant's noise specialist and agreed with the Applicant's compensation advisors as incorporating the widest extent of receptors that may have a potential compensation claim as a result of operational noise under Part 1 of the Land Compensation Act 1973.
- d. All receptors identified as being likely to be significantly affected by operational vibration, smell, fumes, smoke, artificial lighting and/or discharge of any solid or liquid substances from the Proposed Development. On the basis of professional judgement from the Applicant's specialists, all receptors affected by these environmental factors were considered to fall within the wider limits of the noise contour above.

- 4.5.8 A precautionary approach (e.g. the 200m buffer referred to above) was taken in determining Category 3 parties on the basis of information available ahead of the consultation.
- 4.5.9 The process of identifying persons who own or have a known interest in land, impacted by the Proposed Development, consisted of two methods of inquiry: desktop referencing and contact referencing.
- 4.5.10 Land Registry data was received in the form of a digital shape file (a GIS layer) and digital copies of the Official Copy Registers and Title Plans. All relevant freehold, leasehold, mortgagee, beneficiary, other charges, private rights and restrictive covenant information was reviewed, extracted and stored in a land referencing database. The GIS layer obtained from Land Registry was manually compared to the Official Copy Title Plans to confirm the extent of ownership of registered land.
- 4.5.11 From this data the landownership parcels were created. The land ownership parcels were drawn to reflect unique ownership information and were stored spatially on a GIS application.
- 4.5.12 Where land was not registered, additional parcels to complete these gaps were created based on OS mapping and site data. As a result, all land within the Land Referencing Limits was parcelled and given unique reference numbers.
- 4.5.13 Updates were requested from Land Registry on a biannual basis and prior to consultation and submission of the application for development consent to capture any land interest changes.

- 4.5.14 All changes were incorporated into the land referencing database. Any newly identified parties following the conclusion of the consultation period ascertained through Land Registry updates were sent a late consultation letter and Land Interest Questionnaire (explained further below). An ongoing refresh will continue to be maintained during the examination of the application, so that any updates and changes are monitored, accounted for and recorded.
- 4.5.15 Additional desktop activities were undertaken to confirm information received through site enquiries and Land Registry. Electoral roll checks, foreign companies registers, the Charity Commission, Google Maps, 192.com and searches of phone books were carried out where no other information has been received for an occupier of a property. Searches for statutory undertaker and council held information were also undertaken.
- 4.5.16 Companies House searches were undertaken to ensure registered companies' details were verified and the registered office was appropriate for the service of notices and other correspondence. Online data sources such as 192.com were also investigated to identify further potential occupiers and interests.
- 4.5.17 Where the identity of interest holders were unconfirmed on conclusion of these desktop activities, "The Occupier" of that address was added to the database to ensure the property was contacted in order to confirm interests and they received notification of consultation.
- 4.5.18 Further contact referencing activities were undertaken to ensure the information in the project specific database, based on the information provided from HM Land Registry, was as accurate as possible. These activities included:
- a. Land Interest Questionnaires (LIQs) were sent to all parties to confirm their interest and request further information;
  - b. Major Land Owners (MLOs), including local authorities, statutory undertakers and other landowners with multiple land ownerships, were contacted through letter and email, requesting further land interest information;
  - c. site visits were undertaken over all land within the Order Limits to gain an understanding of the physical attributes on the ground such as occupation, use and potential likely ownership; and
  - d. contact site visits to all land parcels were undertaken where LIQs have not been returned in order to speak to interest holders at their properties and identify and confirm the ownership and occupation details.
- 4.5.19 In order to confirm the accuracy of information held in the land referencing database, confirmation schedules were issued to all interested parties identified. These consisted of a pre-populated questionnaire per land interest. The request for confirmation was sent alongside land ownership boundary plans and posted by first class mail.
- 4.5.20 In the case of unregistered land, where information could not be obtained from HM Land Registry and other referencing processes, site notices were affixed on or adjacent to the land inviting persons with an interest in this land to come forward. Site notices were checked regularly and replaced as necessary.

Further research was undertaken through enquiries with adjacent landowners, council enquiries and further desktop research to identify potential lines of investigation and historic interests. Where an interest remained unknown, a notice was placed on or near the land, and the entry “Unknown” was listed in the **Book of Reference [TR020001/APP/3.02]**. Further site notices will be placed on the land if the application is accepted under Section 56 of the Act.

- 4.5.21 Letters were issued to 10,037 PILs during the 2019 statutory consultation, a copy of which can be found in **Appendix C**. The vast majority of these were sent at the start of consultation, however some additional PILs were identified during the consultation period and so were sent letters slightly later. The number of PILs contacted by date is as follows:
- a. 9,580 PILs were issued letters at the start of consultation on 14 October 2019;
  - b. 218 PILs were issued letters on 1 November 2019; and
  - c. 239 PILs were issued letters on 12 November 2019.
- 4.5.22 The date for responding to consultation was the close of consultation on 16 December 2019, all PILs therefore had at least of 33 days to respond.
- 4.5.23 These 10,037 PILs were categorised as follows:
- a. Category 1 and 2: 527; and
  - b. Category 3: 9,510.

### ***Section 47 consultees***

- 4.5.24 Under Section 47 of the Act, Applicants are required to consult with people “living in the vicinity of the land”. This includes local community consultees, residents, interest groups, businesses, and airport users. The Applicant carried out such consultation in accordance with the SoCC, as set out in **Sections 4.6 – 4.8** below.

## **4.6 Consultation methods**

- 4.6.1 In accordance with the requirements of the Act and the SoCC, a range of methods and materials were employed to ensure that all consultees could take part in the consultation.

### **Consultation materials**

#### ***Written information***

- 4.6.2 Information was provided during the consultation electronically via the project’s consultation website, and in hard copy at the Document Inspection Venues and at consultation events. To ensure accessibility the documents were written in plain English. The SoCC also set out that requests for documents in alternative formats (such as translations, easy read, large print, or braille) would be considered where it was reasonably practical to do so. No such requests were received.

- 4.6.3 In accordance with the SoCC, documents were also made available upon request on USB memory stick. These USB memory sticks were provided to host and neighbouring authorities, and were available free of charge at the consultation events.
- 4.6.4 Additionally, those without computer access could request a printed copy of the Guide to Statutory Consultation and Consultation Feedback Form free of charge.
- 4.6.5 The full suite of printed consultation documents was made available for purchase. No such requests were received.
- 4.6.6 The Guide to Statutory Consultation included an overview of all the written materials available to help signpost consultees. A complete list of the consultation documents provided online (and via other means), and a brief explanation of their content is provided in **Table 4.3**. These documents are still available to view on the project website at: [www.lutonrising.org.uk/our-airport/future-luton/](http://www.lutonrising.org.uk/our-airport/future-luton/). Copies of the Information Booklet, Guide to Statutory Consultation, Consultation Feedback Form and Consultation Boards can also be found in **Appendix E**.

Table 4.3: 2019 consultation documents

<b>Consultation documents</b>	
<b>Main statutory consultation documents</b>	
Information Booklet	The Information Booklet provided a high-level summary of the Proposed Development and the information contained within the Guide to Statutory Consultation (the Guide). The Information Booklet explained the rationale for growth and detailed the proposed expansion and mitigation measures. The Information Booklet also provided details of how the community could engage with the consultation process.
Guide to Statutory Consultation	The Guide provided a detailed explanation of the Proposed Development. The Guide provided a detailed summary of the statutory consultation requirements of the Act and provided readers with descriptions of the consultation documents.
Consultation Feedback Form	The Consultation Feedback Form had 12 questions, with some broken down further into sub-questions. It contained a mixture of open and closed questions relating to the Proposed Development.
Statement of Community Consultation	The SoCC set out the approach to consultation. It included details of where and when consultation events were undertaken and where consultation material could be physically reviewed at Document Inspection Venues. The SoCC also provided publicity details of the

<b>Consultation documents</b>	
	consultation, as well as a high-level summary of proposed engagement with particular communities.
Consultation Boards	Consultation Boards provided consultees with visual and technical information concerning the Proposed Development. The Consultation Boards visually presented information contained in other consultation documents.
<b>Detailed technical documents supporting statutory consultation</b>	
Preliminary Environmental Information Report (PEIR) <ul style="list-style-type: none"> <li>• Non-Technical Summary</li> <li>• Volume 1</li> <li>• Volume 2, Part A</li> <li>• Volume 2, Part B</li> <li>• Volume 3, Contents</li> <li>• Volume 3, Appendices</li> </ul>	The PEIR described the environmental considerations relevant to the Proposed Development. It detailed the methodology undertaken in assessing the potential environmental impacts and set out the preliminary findings of the impact assessment for the Proposed Development, including the proposed environmental mitigation measures. The PEIR also included a Draft Code of Construction Practice (CoCP).
Outline Need Case	The Outline Need Case described the case for the Proposed Development. It assessed the demand forecasts against current and future required capacity whilst highlighting the economic implications of growth.
Surface Access Strategy Report	The Surface Assess Strategy provided a summary of the Proposed Development in respect of surface access. It included analysis on surface access matters including public transport strategy, transport modelling approach and key findings and proposed mitigation measures.
Scheme Development and Construction Report	The Scheme Development and Construction Report documented the key features of the Proposed Development. It explained the parameters of the individual elements that the Applicant was proposing to seek consent for, documenting development considerations and providing details on proposed delivery.
Explanatory Note on Airspace	The Explanatory Note on Airspace provided more information on the process of airspace change, which is subject to an ongoing process as part of a wider Government initiative, separate from the Proposed Development. As it was recognised that this process is of interest to many consultees, this document sought to provide the necessary background information on the airspace change that is taking place. In addition to explaining the broader context of the airspace change, this Note explained what this could mean for the airport and the interaction with the DCO process.

<b>Consultation documents</b>	
Compensation Policies, Measures and Community First	The Compensation Policies, Measures and Community First document explained the legal compensation framework requirements and provided a summary of the proposed compensation scheme. The Compensation Proposals document also outlined the Community First fund, an additional fund to ensure a greater share of community funding goes to neighbouring authorities.
Draft Land Assembly Plans	The Draft Land Assembly Plans spatially displayed the land required for the Proposed Development, including offsite developments.
Outline Employment and Training Strategy	The Outline Employment and Training Strategy explained how the economic and employment benefits associated with the Proposed Development would be maximised for Luton and the three counties of Hertfordshire, Bedfordshire, and Buckinghamshire.

4.6.7 In addition to the documents listed in **Table 4.3**, previously published documents from the earlier 2018 consultation remained accessible on the project's consultation website.

### ***Consultation Feedback Form***

4.6.8 A Consultation Feedback Form was provided for anyone wishing to respond to the consultation. It could be completed online via the website or in hard copy. Consultees were able to complete and submit hard copy forms at the consultation events or via the FREEPOST address.

4.6.9 Consultees were asked to state whether they were an individual or responding on behalf of an organisation and to confirm their status as an employee, commercial or business partner or travelling customer (of varying frequencies), where relevant. The Consultation Feedback Form also asked consultees to state what negative impacts from the airport they had been subject to before seeking open comments on the Proposed Development.

4.6.10 Feedback was also accepted via postcards as well as in the form of freeform letter or email.

## **4.7 Engagement methods**

4.7.1 To ensure the 2019 statutory consultation was inclusive and accessible to all, several communication channels were used as set out below. These were consistent with the 2019 SoCC.

### ***Website***

4.7.2 A dedicated website was available from the start of the consultation period: [www.futureluton.lal.org.uk](http://www.futureluton.lal.org.uk). This remained live for the duration of the consultation. It contained the written information described above, details of the consultation events, contact information and details of how to respond to the

consultation. Consultation documents were available to download free of charge from the website.

- 4.7.3 The website was promoted through the notification methods, such as letters, leaflets and advertisements, discussed further in **Section 4.9** of this document.

### ***Phoneline***

- 4.7.4 At the start of the consultation a helpline was launched which was available Monday to Friday 09:00 – 17:00. The phoneline was available for consultees to leave a message, ask questions relating to the Proposed Development and ask for hard copies of consultation materials.

- 4.7.5 Formal consultation feedback was received by exception via the phoneline. A total of three consultation responses were recorded in this manner.

### ***Project email address***

- 4.7.6 A project specific email address ([futureluton@lla1.org.uk](mailto:futureluton@lla1.org.uk)) was available throughout the consultation period. It was available for consultees to request further information, submit consultation responses or ask questions. Consultation responses received via email have been considered in the same way as those received through other channels.

### ***Consultation events***

- 4.7.7 In total 35 consultation events were hosted at locations in the community. These events enabled members of the public to view information on the Proposed Development, talk to members of the project team and complete Consultation Feedback Forms.
- 4.7.8 The event venues were primarily chosen on the basis of their suitability as a community facility, their proximity to potentially affected communities, provision of disabled access and their availability.
- 4.7.9 Details of the consultation events were provided on the project website, in the 2019 SoCC, by direct communications, locally displayed posters, press and radio advertising and social media. In total 3,894 people attended the consultation events. **Table 4.4** below provides details of venue locations, dates, and times, along with number of attendees.
- 4.7.10 One of the events, that was held in Leighton Buzzard on 22 November 2019, was not planned at the start of consultation but was added in response to requests from the community.

Table 4.4: 2019 consultation events

<b>Date 2019</b>	<b>Town/village</b>	<b>Venue address</b>	<b>Time</b>	<b>Number of attendees</b>
Friday 25 October	Luton	Maidenhall Primary School, Newark Road, LU4 8LD	16:00 – 20:00	28



<b>Date 2019</b>	<b>Town/village</b>	<b>Venue address</b>	<b>Time</b>	<b>Number of attendees</b>
Saturday 26 October	Luton	Wigmore Church & Community Centre, Crawley Green Road, LU2 9TE	11:00 – 17:00	320
Tuesday 29 October	Dagnall, Buckinghamshire	Dagnall Village Hall, Dunstable Road, HP4 1RG	16:00 – 20:00	83
Wednesday 30 October	Marshalswick, St Albans	Marshalswick Community Centre, The Ridgeway, AL4 9TU	14:00 – 20:00	283
Thursday 31 October	Caddington, Bedfordshire	Caddington Sports and Social Club, Manor Road, LU1 4HH	14:00 – 20:00	182
Friday 1 November	Pitstone, Buckinghamshire	Pitstone Memorial Hall, Vicarage Road, Pitstone, LU7 9EY	14:00 – 20:00	79
Saturday 2 November	Wendover, Buckinghamshire	Wendover Memorial Hall, Wharf Road, HP22 6HF	11:00 – 15:00	53
Monday 4 November	Hertford, Hertfordshire	The Mill Bridge Rooms, The Seed Warehouse, The Wash, SG14 1PX	16:00 – 19:00	59
Tuesday 5 November	Hitchin, Hertfordshire	Hitchin Town Hall, Brand Street, SG5 1HX	14:00 – 20:00	344
Wednesday 6 November	Whitwell, Hertfordshire	Whitwell New Fellowship Hall, 9 Bendish Lane, SG4 8HX	14:00 – 20:00	134
Thursday 7 November	Wheathampstead, Hertfordshire	The Memorial Hall, Marford Road, Wheathampstead, AL4 8AY	14:00 – 20:00	140
Friday 8 November	Berkhamsted, Hertfordshire	Civic Centre, 161 High Street, Berkhamsted, HP4 3HB	15:00 – 19:00	121

<b>Date 2019</b>	<b>Town/village</b>	<b>Venue address</b>	<b>Time</b>	<b>Number of attendees</b>
Monday 11 November	Flamstead, Hertfordshire	Flamstead Village Hall, Church Road, Flamstead, AL3 8BN	16:30 – 20:00	71
Tuesday 12 November	Harpenden, Hertfordshire	Southdown Room, Harpenden Public Halls, Southdown Road, AL5 1TE	14:00 – 20:00	285
Wednesday 13 November	Welwyn, Hertfordshire	Civic Centre, Prospect Place, Welwyn, AL6 9ER	16:00 – 20:00	84
Thursday 14 November	Aylesbury, Buckinghamshire	The Gateway, Gatehouse Road, Aylesbury, HP19 8FF	16:00 – 20:00	19
Friday 15 November	Luton	St Francis Church, Carteret Road, Luton, LU2 9JZ	16:00 – 20:00	136
Saturday 16 November	Borehamwood, Hertfordshire	Fairway Hall, Brook Close, Borehamwood, WD6 5BT	11:00 – 15:00	31
Monday 18 November	Markyate, Hertfordshire	Markyate Village Hall, 39 Cavendish Road, Markyate, AL3 8PS	14:00 – 20:00	131
Tuesday 19 November	Luton	Stockwood Discovery Centre, London Road, Luton, LU1 4LX	14:00 – 20:00	192
Thursday 21 November	Nash Mills, Hertfordshire	Nash Mills Village Hall, Lower Road, Nash Mills, HP3 8RT	16:00 – 20:00	18
Friday 22 November	Leighton Buzzard, Bedfordshire *	Leighton Town FC, Bell Close, Lake Street, LU7 1RX	16:00 – 20:00	138
Saturday 23 November	Watford	Holywell Community Centre, Chaffinch Lane, Watford, WD18 9QD	11:00 – 15:00	57
Monday 25 November	Breachwood Green, Hertfordshire	Breachwood Green Village Hall, Chapel Road, Breachwood	14:00 – 20:00	207

<b>Date 2019</b>	<b>Town/village</b>	<b>Venue address</b>	<b>Time</b>	<b>Number of attendees</b>
		Green, Hitchin, SG4 8NX		
Tuesday 26 November	Letchworth, Hertfordshire	The Broadway Hotel, Broadway, Letchworth, SG6 3NZ	16:00 – 20:00	101
Wednesday 27 November	Redbourn, Hertfordshire	Redbourn Village Hall, 63 High Street, Redbourn, AL3 7LW	14:00 – 20:00	140
Thursday 28 November	Luton	Ramridge Primary School, Turners Road North, Luton, LU2 9AH	16:00 – 20:00	55
Friday 29 November	St Albans	Jubilee Centre, Catherine Street, St Albans, AL3 5BU	14:00 – 20:00	143
Saturday 30 November	Royston, Hertfordshire	Market Hill Rooms, Fish Hill, Royston, SG8 9JL	11:00 – 15:00	58
Mon 2 December	Luton	Marsh Farm Futures, The Moakes, Luton, LU3 3QB	16:00 – 20:00	45
Tuesday 3 December	Dunstable, Bedfordshire	Dunstable Conference Centre, 51 High Street North, LU6 1JF	16:00 – 20:00	29
Wednesday 4 December	Tring, Hertfordshire	Nora Grace Hall, Faversham Close, Tring, HP23 5BA	14:00 – 20:00	116
Thursday 5 December	Stevenage, Hertfordshire	Arts and Leisure Centre, Lytton Way, Stevenage, SG1 1LZ	16:00 – 20:00	117
Friday 6 December	Eaton Bray, Bedfordshire	Eaton Bray Village Hall, Church Lane, Eaton Bray, LU6 2DJ	16:00 – 20:00	48
Saturday 7 December	Slip End, Bedfordshire	Slip End Village Hall, The Cross Roads, Markyate Road, LU1 4BJ	11:00 – 15:00	105

\*Additional event.

- 4.7.11 Consultation Boards explaining the Proposed Development were displayed at all venues. The boards are available to view on the project website at: [www.lutonrising.org.uk/our-airport/future-luton/](http://www.lutonrising.org.uk/our-airport/future-luton/).
- 4.7.12 In addition to the consultation events above, some additional pop-up events were held as follows:
- a. The Mall, Luton on 18 October 2019;
  - b. event for the community and university students in the morning and another event for young people at the University of Bedfordshire on 22 October 2019;
  - c. Inspire Luton (leisure centre) on 22 October 2019;
  - d. event for easyJet staff at the easyJet hangar on 29 October 2019;
  - e. event for LBC staff at Luton Town Hall on 19 November 2019; and
  - f. the airport terminal on 20 November 2019.

## 4.8 Document Inspection Venues

- 4.8.1 Copies of all consultation materials including Consultation Feedback Forms were made available to view free of charge from the start of consultation and throughout at 32 Document Inspection Venues. One of these venues (Leighton Buzzard Library) was not included in the SoCC because it was added after the consultation had started. This new Document Inspection Venue was advertised in local newspapers, a copy of the advert can be found in **Appendix F**. The list of Document Inspection Venues used during the consultation period is provided in **Table 4.5**.

Table 4.5: 2019 Document Inspection Venues

Document Inspection Venues	
Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF	Luton Central Library, St George's Square, Luton, LU1 2NG
Baldock Library, Simpson Drive, Baldock, SG7 6DH	Luton Borough Council, Town Hall, George Street, Luton, LU1 2BQ
Beacon Villages Community Library, Old Town Hall, High Street, Ivinghoe, LU7 9EP	Marsh Farm Library, Lea Manor High School, Northwell Drive, Luton, LU3 3TL
Bury Park Library, Bury Park Community Centre, 161 Dunstable Road, Luton, LU1 1BW	Milton Keynes Central Library, 555 Silbury Boulevard, Central Milton Keynes, MK9 3HL
Cambridge City Council, Mandela House, 4 Regent Street, Cambridge, CB2 1BY	Milton Keynes Council, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3EJ

<b>Document Inspection Venues</b>	
Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford, SG17 5TQ	North Hertfordshire District Council, Council Offices, Gernon Road, Letchworth Garden City, SG6 3JF
Central Bedfordshire Council, Watling House, High Street North, Dunstable, LU6 1LF	South Cambridgeshire Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA
Dunstable Library, The Dunstable Centre, Court Drive, Dunstable, LU5 4JD	St Albans Council, Civic Centre, St Peter's St, St Albans, AL1 3JE
Harpenden Library, 27 High Street, Harpenden, AL5 2RU	St Albans Library, The Maltings, St Albans, AL1 3JQ
Hemel Hempstead Library, The Forum, Marlowes, Hemel Hempstead, HP1 1DN	Stevenage Borough Council, Daneshill House, Danestrete, Stevenage, SG1 1HN
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DQ	Stevenage Central Library, Southgate, Stevenage, SG1 1HD
Hitchin Library, Paynes Park, Hitchin SG5 1EW	Stopsley Library, 598 Hitchin Road, Luton, LU2 7UN
Huntingdonshire District Council, Pathfinder House, St Mary's Street, Huntingdon PE29 3TN	Tring Library, High Street, Tring, HP23 4AF
Leagrave Library, Marsh Road, Luton, LU3 2NL	Welwyn Library, Civic Centre, Prospect Place, Welwyn, AL6 9ER
Leighton Buzzard Library, Ground Floor Library Building, Lake Street, Leighton Buzzard, LU7 1RX	Wendover Community Library, High Street, Wendover, HP22 6DU
Letchworth Library, Broadway, Letchworth Garden City, SG6 3PF	Lewsey Library, Landrace Road, Luton, LU4 0SW

## 4.9 Notification

### *Letters*

- 4.9.1 In accordance with the 2019 SoCC, Prescribed Consultees, local authorities and PILs received consultation letters at the start of the consultation period, formally notifying them of consultation and providing further detail on the Proposed Development and how they could engage with the consultation process. A copy of the letter sent to Prescribed Consultees and local authorities and the letter sent to PILs can be found in **Appendix C**, along with the Section 47/48 notice included with the letters. The copy of the Section 48 notice was included in the consultation packs set to the consultee bodies, those falling within Section 42(1)(a)-(c), in order to comply with Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

4.9.2 In accordance with Section 46 of the Act a letter was also sent to the Secretary of State on 14 October 2019 notifying them of the start of consultation. A copy of this letter can be found in **Appendix C**.

### ***Statutory notices***

4.9.3 To comply with the requirements of Section 47 and Section 48 of the Act, in particular the duty to publicise the consultation, and the approach set out in the 2019 SoCC, statutory notifications were placed in newspapers at the start of the consultation period. These notices provided details of the consultation, including the Document Inspection Venues, consultation events and the duration of the consultation period. **Table 3.2** in Section 3 provides a list of the newspapers which featured published notices of consultation and the date of publication. Copies of the statutory notices can be found in **Appendix C**.

4.9.4 Site notices were also placed in the vicinity of the airport, a sample of photos of which can be found in **Appendix C**.

### ***Newsletters***

4.9.5 In accordance with the SoCC, at the commencement of the consultation period, a newsletter detailing the Proposed Development, consultation events and how stakeholders could engage with the proposals was sent to community consultees. This newsletter advertised the consultation process to those living and/or working underneath the airport's flight paths as well as people living within 1km of community consultation event venues, as discussed in **Section 4.4**. The newsletter was sent to 189,475 addresses on 14 October 2019. An additional newsletter was sent to 17,690 addresses on 14 November 2019 providing information on the additional Leighton Buzzard event. The area covered by the additional newsletter was based on a 1km radius around the event venue, plus additional areas in Leighton Buzzard where residents were likely to have an interest in the consultation based on the project team's knowledge. A copy of the two newsletters can be found in **Appendix F**.

4.9.6 In addition to these areas, newsletters were also sent to the following:

- a. local libraries;
- b. community centres;
- c. places of worship;
- d. venues where events would be held;
- e. parish councils; and
- f. contacts identified that work with or can reach out to hard to reach groups.

## **4.10 Advertising and publicity**

### ***Posters***

4.10.1 Posters were distributed to venues across Luton and the surrounding local authority areas in accordance with the approach set out in the 2019 SoCC. These described the Proposed Development, consultation events and how

consultees could engage with the proposals. Venues where these posters were circulated for display included:

- a. local libraries;
- b. community centres;
- c. education establishments;
- d. places of worship;
- e. venues where events would be held;
- f. the airport;
- g. parish councils (as identified within the host authorities identified at paragraph 2.4.5); and
- h. town/district/county councils.

4.10.2 A full list of the locations which received posters along with a copy of the poster and photos of the poster in situ can be found in **Appendix F**.

***Print advertisements***

4.10.3 In addition to the statutory notices, advertisements were placed in local newspapers throughout the consultation period. **Table 4.6** describes the newspapers and dates of hard copy adverts. These print advertisements were in accordance with the 2019 SoCC. There were two versions of the newspaper adverts, one used at the start of the consultation period and another towards the end, copies of both adverts can be found in **Appendix F**, along with photos of examples of the adverts in newspapers. A variation of the advert highlighting the additional Document Inspection Venue at Leighton Buzzard was also used, a copy can be found in **Appendix F**.

Table 4.6: 2019 print advertisements

Newspaper	Date of advert publication
Bedford Time and Citizen	Once a week for 10 weeks from 7 October 2019 to 15 December 2019
Biggleswade Chronicle	
The Barnet Borough Times (Borehamwood and Elstree Times)	
Bucks Free Press	
Bucks Herald	
Dunstable Gazette	
Dunstable Today	
Hemel Hempstead Gazette	
Hertfordshire Mercury	
Herts Advertiser	
Hitchin Comet	
Leighton Buzzard and Linslade Citizen	

Newspaper	Date of advert publication
Leighton Buzzard Observer	
Letchworth Comet	
Luton Herald and Post	
Luton News	
Milton Keynes Citizen	
St Albans and Harpenden Review	
Stevenage Comet	
Watford Observer	
Welwyn and Hatfield Times	

### ***Out of home advertising***

4.10.4 Adverts were placed on local buses, trains and taxis as follows:

- a. sides of 20 buses operating in Luton and 32 buses operating outside of Luton for eight weeks from 16 October 2019;
- b. sides of 40 taxis operating in the vicinity of the airport for eight weeks from 16 October 2019;
- c. on 280 interior panels on Thameslink trains for eight weeks from 16 October 2019;
- d. on ten road side billboards in the vicinity of the airport, for example at bus stops, for eight weeks from 16 October 2019.

4.10.5 **Figure 4.2** below provides examples of the out of home adverts.





Figure 4.2: Example of advert used on local trains, buses, billboards and taxis

**Radio advertisements**

4.10.6 Radio adverts were played on Heart FM throughout the consultation period. Adverts were also played on local community radio stations. The 2019 SoCC stated that the Applicant would share press releases with journalists and facilitate coverage in national and local media – print, radio, and television. The production of radio adverts to play on local radio stations was therefore over and above the approach set out the SoCC.

### ***Press releases***

- 4.10.7 In accordance with the 2019 SoCC press releases were shared with journalists to facilitate coverage in national and local print, radio, and television media. This was in addition to the information provided in national and local newspapers (as detailed in **Table 3.2**) and the information shared with local authorities and parish councils for inclusion in their own print newsletters.

### ***Online and social media including paid-for media adverts***

- 4.10.8 In accordance with the 2019 SoCC the consultation was promoted using various social media channels, including Twitter (@LLA\_Ltd and @LutonCouncil) and Facebook (pages: LondonLutonAirportLtd and LutonCouncil) accounts. Posts included details of the Proposed Development and encouraged users to visit the project website and provide feedback.
- 4.10.9 Local authorities were also encouraged to use their own social media channels to promote the consultation and website.
- 4.10.10 Geographically targeted paid-for advertising on social media (including Twitter and Facebook) was used to encourage the local community and stakeholders to visit the project website and consultation events, and provide feedback. This approach was in accordance with the 2019 SoCC.

### ***Postcards***

- 4.10.11 Postcards containing a short overview of the Proposed Development were distributed to places of worship, council buildings, community centres and children's centres to facilitate participation from underrepresented groups. Consultees were able to provide feedback on the postcards and return through the FREEPOST address. Feedback received in this way has been considered in the same way as all other feedback. This activity was not envisaged in the 2019 SoCC and was therefore an additional engagement method.

### ***Email***

- 4.10.12 Stakeholders, including businesses, interest groups and individuals who took part in the 2018 non-statutory consultation were sent an email notification at the commencement of the consultation period. Emails provided consultees with details of the consultation process, including Document Inspection Venues, event times and the duration of the consultation period. A list of the community and interest groups emailed can be found in **Appendix F**. In total 212 local businesses were also contacted.

### ***Parish and local authority websites, newsletters and noticeboards***

- 4.10.13 In accordance with the 2019 SoCC information was submitted to parish councils within the host authority areas, and local authorities for inclusion in their newsletters. Where parish council newsletters allowed, space for advertisements was sought. Parish councils and local authorities were also sent posters to put up on their noticeboards.

## 4.11 Local authority and parish council briefings

- 4.11.1 Regular meetings were held with the POCG and wider group in advance of the 2019 statutory consultation.
- 4.11.2 In accordance with the 2019 SoCC, briefings about the consultation were offered to the wider group and parish councils within the host local authority area. An event was held for parish councils and six briefings were held with the local authorities. Throughout the consultation period the Applicant worked with the local authorities to ensure that they had the correct information about the Proposed Development and consultation process to help them advertise and promote the consultation effectively.
- 4.11.3 Information was provided to parish councils and local authorities for possible inclusion in their local newsletters. Additionally, where parish councils allowed advertisements in their newsletters, advertisements to promote the consultation events were submitted, and directed consultees to the website. Packs of posters were provided to each parish council to put on their local noticeboards.

## 4.12 Businesses

- 4.12.1 As part of the engagement in accordance with Section 47 of the Act, business groups, such as the Chamber of Commerce, airlines and the South East Midlands and Hertfordshire Local Enterprise Partnerships were encouraged to engage with the proposals and share details of the consultation with their business community contacts and employees. 212 local businesses were contacted by email at the start of consultation.
- 4.12.2 The Applicant also worked closely with the airport's operator, London Luton Airport Operations Limited (LLAOL), to encourage them to participate in the consultation process and ensure they shared the details with other businesses, as well as their employees.

## 4.13 Hard to reach groups

- 4.13.1 Hard to reach groups, including young people, working families, people with disabilities as well as minority groups were contacted through specific means, following advice received from host authorities and in accordance with the 2019 SoCC. This included measures such as the distribution of poster packs to schools to facilitate advertising the consultation to students and pupils and the hosting of consultation events in evenings and weekends, enabling working families the opportunity to participate in the consultation.
- 4.13.2 The selection of consultation events, based on their level of access and location, was also informed by the needs of particular hard to reach groups, including people with disabilities and minority groups.
- 4.13.3 A list of hard to reach groups contacted can be found in **Appendix F**.

## 4.14 Analysis of feedback

- 4.14.1 In accordance with s.49 of the Act, the duty to take account of responses, after the consultation had closed the Applicant carefully considered all feedback received. All feedback received was entered into a master database, this involved copying text received via emails, copying text from the online Feedback Form and transcribing feedback received in letters or hard copies of the Feedback Form, along with the three responses received via telephone.
- 4.14.2 The database recorded the stakeholder category of each respondent, i.e. each response was classified as a Prescribed Consultee, local authority or community consultee. The database was then checked against the list of PILs and those respondents who were PILs were recorded as such. This meant that some respondents were recorded as two categories of respondent, for example a Prescribed Consultee as well as a PIL.
- 4.14.3 All comments in the database were then 'coded' by an external company, this involved comments being read and categorised into similar topics, for example all comments about the impact of the proposal on habitats were given an 'impact on habitats' code.
- 4.14.4 The coded database was then returned to the project team who read all comments code by code. The project team drafted a summary for every comment. In some cases, multiple responses were received raising the same issue. For these, one response was drafted and applied to all the responses that raised that issue. For responses making more detailed or specific points a unique summary was drafted, or in some cases the text as submitted in the response was copied verbatim rather than the project team drafting a summary.
- 4.14.5 'Due regard' tables of the summaries were then produced from the database. For Prescribed Consultees and local authorities the tables recorded the name of the consultees who had made that comment. For PILs and community consultee the tables recorded the number of respondents who had made that comment.
- 4.14.6 Workshops were held for each topic with the project team to discuss the key feedback received and agree if, and how, the Proposed Development should be changed to address each comment. The workshops focused on the key feedback received, outside of the workshops the project team considered all other comments received and made changes to the Proposed Development accordingly.
- 4.14.7 Responses to each comment were then drafted and recorded in the 'due regard' tables along with a record of whether a change had been made to the Proposed Development in response to the comment. The 'due regard' tables for 2019 statutory consultation can be found in **Appendix L**.

## 5 2022 STATEMENT OF COMMUNITY CONSULTATION

### 5.1 Introduction

5.1.1 This section describes the process the Applicant followed to prepare and publicise the 2022 SoCC.

### 5.2 Consultation on the SoCC

5.2.1 Ahead of the launch of the second statutory consultation the Applicant prepared a new draft SoCC under Section 47 of the Act. The objective of the SoCC was to set out how the Applicant proposed to consult with people living in the vicinity of the land about the proposed application for development consent. The SoCC described a range of engagement methods.

5.2.2 The Proposed Development is located within the geographical boundaries of five host authorities (as defined under Section 43(1) of the Act) who were all consulted on the draft SoCC:

- a. Central Bedfordshire Council
- b. Hertfordshire County Council;
- c. LBC;
- d. Dacorum Borough Council; and
- e. North Hertfordshire District Council.

5.2.3 Dacorum Borough Council was a host authority for the 2022 statutory consultation, however they were consulted as a neighbouring authority on the draft 2022 SoCC because they were only identified as a host authority shortly before the start of the 2022 statutory consultation, after the consultation on the draft 2022 SoCC had been completed. Dacorum Borough Council provided comments on the draft 2022 SoCC which were considered in the same way as responses from all other authorities, i.e. in the same way as the host authority responses.

5.2.4 Since the nature of airport expansion proposals generate issues of more than a local significance, the Applicant also consulted a wider group of “neighbouring” local authorities on the SoCC as defined by Section 43(2). This comprised:

- a. Barnet Council;
- b. Bedford Borough Council;
- c. Buckinghamshire Council;
- d. Cambridgeshire County Council;
- e. East Hertfordshire District Council;
- f. Enfield Council;
- g. Essex County Council;
- h. Harrow Council;
- i. Hillingdon Council;

- j. Huntingdonshire District Council;
- k. Milton Keynes Council;
- l. South Cambridgeshire District Council;
- m. St Albans City & District Council;
- n. Stevenage Borough Council;
- o. Uttlesford District Council; and
- p. Welwyn Hatfield Borough Council.

5.2.5 Three Rivers District Council were a neighbouring authority for the 2022 statutory consultation, however they were not consulted on the draft 2022 SoCC because Dacorum Borough Council was only identified as a host authority shortly before the start of the 2022 statutory consultation, after the consultation on the draft 2022 SoCC had been completed. This meant that when consultation was undertaken on the draft 2022 SoCC, Three Rivers District Council had not yet been identified as a neighbouring authority. No additional engagement with Three Rivers District Council was undertaken on the 2022 draft SoCC, however at the start of consultation they were sent a letter (along with all other host and neighbouring authorities) and USB stick with all consultation materials which included the 2022 SoCC.

5.2.6 Consultation on the draft SoCC took place between 6 August and 17 September 2021 (32 days in total). A copy of the draft SoCC can be found in **Appendix G**.

### 5.3 Outcomes of the SoCC consultation

5.3.1 Nine local authorities responded to the consultation on the SoCC. This included responses from all five host authorities, and Dacorum Borough Council. All comments were carefully considered and responses to each point raised are presented in **Table 5.1** below.

5.3.2 The following key changes were made to the draft SoCC in response to consultation responses:

- a. additional information on the rationale for a 'digital first' consultation was added;
- b. a map of the red line boundary was added as an appendix to the SoCC;
- c. the approach to engaging hard to reach communities was further developed; and
- d. a reference to key printed consultation materials being provided to Home Library Services was added.

5.3.3 A note setting out the Applicant's response to responses received on the draft 2022 SoCC was sent to all local authorities consulted on 9 October 2021; a copy of this can be found in **Appendix G**, along with a final copy of the SoCC.

Table 5.1: Summary of consultation on 2022 draft SoCC and regard had to responses received

Local authority	Summary of responses received	Regard had to the responses
LBC	Ensure that the main themes raised in LBC’s response to the 2019 consultation on the draft SoCC are taken on board.	LBC’s comments on the 2019 draft SoCC were considered during the drafting of the SoCC and no further changes were required.
	Ensure that the consultation process is transparent, particularly to the lay person.	Every effort was made to ensure the consultation process was both easy to understand and transparent.
	Publish responses to the 2019 consultation and Luton Rising’s response to these prior to the consultation in 2022.	Due to the impacts of Covid-19, it took longer than anticipated to respond to each of the themes raised during the 2019 statutory consultation. The 2019 Statutory Consultation Feedback Report was published as part of 2022 statutory consultation and identified as one of the consultation documents in the SoCC.
	Set out how previous consultations (2018 and 2019) have informed the 2022 consultation e.g. the effectiveness of engagement with hard to reach groups and lessons learned.	The purpose of the SoCC was to set out the Applicant’s approach to the 2022 statutory consultation. The 2022 consultation complies with the requirements of a statutory consultation as set out in the Act. 61his61on61h used in 2018 and 2019 was considered when developing the 2022 approach, for example, attendance from the 2019 statutory consultation was used to inform the selection of locations for consultation events in 2022. External factors, most notably the impact of Covid-19, were also taken into account.
	Suggest that an eight-week consultation would be appropriate.	Noted.
	Agree with having less physical event locations and	Noted.

Local authority	Summary of responses received	Regard had to the responses
	more of an emphasis on online engagement.	
	Request to include a plan of the proposed DCO red line boundary in the SoCC.	The SoCC was updated to include this.
	Ensure that those being consulted are made aware of how they can participate in the DCO examination process.	The purpose of the SoCC was to set out the Applicant's approach to consultation. However, a brief explanation of the DCO examination process was added to section 2 of the SoCC.
North Hertfordshire District Council	Given the amount of consultation materials and supporting documentation, suggest extending the consultation period to be 10 or 12 weeks.	An eight-week consultation period is consistent with the approach taken in 2019. It also exceeds the statutory minimum 28 days required by the Act.
	Suggest including mention of managing air quality and noise impacts, creating employment opportunities, and seeking to address wider surface access impacts beyond Luton in 1.4.3.	Section 1.4.3 of the SoCC provides a brief description of the Proposed Development. The purpose of the SoCC was to set out the Applicant's approach to consultation, not to cover the content of the consultation materials. Detail regarding air quality, noise impacts, employment opportunities, and wider surface access impacts was covered in the consultation materials.
	Suggest there is reference to working with neighbouring authorities in 1.4.5.	Reference was added to section 1.4.5 of the SoCC.
	There appears to be no mention of an updated surface access/transport report included in the list.	Getting to and from the Airport – Our Emerging Transport Strategy was listed along with the other consultation documents under section 3.2.8 of the SoCC. Reference to this report was also added to section 1.5.3 of the SoCC for clarity.
	More detail should be provided in the SoCC about how Green	The purpose of the SoCC was to set out the Applicant's approach to consultation, not to cover the content of the consultation



Local authority	Summary of responses received	Regard had to the responses
	<p>Managed Growth<sup>3</sup> should be monitored and reported.</p>	<p>materials. Detail regarding how GCG will be monitored and reported was covered in the consultation materials, including the specific Approach to GCG document.</p>
	<p>Ensure that the opening hours for the council offices as listed as a document inspection venue are updated before the SoCC is published, as it is currently open for essential appointments only.</p>	<p>Opening hours were included in the SoCC. The North Hertfordshire District Council offices address was also added as a Document Inspection Venue. All Document Inspection Venues were contacted in advance of the SoCC being published (and in advance of the consultation launch) to ensure that the opening times and other details were correct.</p>
	<p>Include additional document inspection venues in North Hertfordshire at the libraries in Baldock, Knebworth and Letchworth Garden City. Consideration should be given to reinstating the full list of document inspection venues from the 2019 consultation and, if not, provide an explanation as to why changes to the approach have been made.</p>	<p>The 2022 statutory consultation was digitally led in response to the uncertainty over face-to-face engagement created by the Covid-19 pandemic and the desire to conduct the consultation in a sustainable way. Consultation included a virtual exhibition space to enable people to view the consultation materials in an interactive and engaging manner. The virtual exhibition space was open 24/7 throughout the consultation period, so that people could access it at a time of their convenience. There were also 13 in-person consultation events spread across a wide area where printed copies of materials were made available. People were able to request printed copies of documents by getting in touch. Posters were displayed in key</p>

<sup>3</sup> After the 2019 statutory consultation and before the 2022 statutory consultation the Applicant’s Green Managed Growth approach was renamed to Green Controlled Growth.

Local authority	Summary of responses received	Regard had to the responses
	<p>Consideration should be given to including additional events in Letchworth Garden City and Royston. Apart from Covid-19 risks, no further justification has been given for the reduction in face-to-face events.</p>	<p>community locations to raise awareness of the consultation and had a QR code displayed for easy access to the online materials. Further, the APFP Regulations 2009 were permanently updated in 2020 to remove the requirement to make documents available to inspect at physical venues. The requirement is now to have the address of a website where the documents can be found. Given the enhanced provision of online materials and the update to regulations, it was felt that a rationalisation of the number of document inspection venues for the 2022 statutory consultation was appropriate. There were still 10 Document Inspection Venues in accessible locations. This reasoning was added to section 3.2 of the SoCC.</p> <p>The 2022 statutory consultation was digitally led. This was in recognition of the effect of the pandemic on some people’s willingness to attend events, and on the Applicant’s commitment to run the consultation in the most sustainable manner possible. By reducing the number of events, the overall number of documents that need to be printed was reduced (while allowing those who wanted them to request them), as well as reducing the need for staff and for consultees to travel. The virtual exhibition space was open 24/7 throughout the consultation period, so that people could access it at a time of their convenience. This was in addition to what was offered during the 2019 statutory consultation. There were 13 in-person events spread across a</p>

Local authority	Summary of responses received	Regard had to the responses
		wide area. The attendance levels at each event in 2019 were considered when selecting the spread of events. The rationale for having a reduced number of in-person events compared with the 2019 statutory consultation was added to section 3.3 of the SoCC.
	Clarity is sought on the reference to engagement with traveller communities “We will offer to support local authorities to deliver face-to-face engagement with these groups”, as the council is willing to provide contacts but does not consider its role to deliver face-to-face engagement on behalf of LLAL.	Comment noted. Section 5.4 of the SoCC was updated to clarify that that the Applicant would undertake the engagement with traveller communities, drawing on the expertise of local authorities.
	Request to include a plan of the proposed DCO red line boundary in the SoCC.	The SoCC was updated to include this.
Central Bedfordshire Council	Suggest rewording paragraph 1.1.2 to clearly state that the Secretary of State makes a decision on the proposal.	Text reworded to clarify this point.
	Suggest extending the consultation period to 10 weeks to be consistent with the 2019 consultation period.	An eight-week consultation period is consistent with the approach taken in 2019. It also exceeds the statutory minimum 28 days required by the Act.
	Request to confirm the reasoning for reducing the number of document inspection venues. Suggest making documents available at a suitable public venue in Biggleswade.	See response to comment by North Hertfordshire District Council above on the same matter.
	Request to include a map showing the location of document inspection venues in the appendix of the SoCC.	A map that shows the locations of document inspection venues was added as an appendix to the SoCC.

Local authority	Summary of responses received	Regard had to the responses
	<p>Welcome that printed and alternative copy format copies of consultation materials will be provided on request. Request to include the likely costs and timescales for receiving documents once a request has been made.</p>	<p>Text was redrafted to state '<i>Printed copies will be sent out within five working days of the request being made, where possible. Alternative format copies will be considered on a case-by-case basis and the timescales for these being sent out will be dependent on the specific request.</i>' The cost for a printed copy of the full suite of documents was also added (£260).</p>
	<p>Request to be informed if the venues for face-to-face events are changed from those in the SoCC, and to be involved in discussions to identify suitable alternatives.</p>	<p>This was noted, however there were no subsequent venue changes.</p>
	<p>Welcomes further discussion on how to engage with traveller communities in Central Bedfordshire. Also, to understand what other options are being considered in light of Covid-19 and why local authorities would be expected to deliver face-to-face meetings.</p>	<p>Comment noted. Section 5.4 of the SoCC was updated to clarify that that the Applicant would undertake the engagement with traveller communities, drawing on the expertise of local authorities.</p>
	<p>Suggest that any learnings and ways to improve the hard to reach group engagement from the 2019 consultation should be set out in the SoCC.</p>	<p>The 2019 statutory consultation exercise was reviewed when planning the approach for contacting hard to reach groups for the 2022 statutory consultation. However, it was not the purpose of the SoCC to set out any learnings from previous consultations.</p>
	<p>Suggest that the Central Bedfordshire Home Library Service is also used to share printed materials with hard to reach groups.</p>	<p>Comment noted. The SoCC was updated to include the Central Bedfordshire Home Library Service.</p>
	<p>Request to include the timescales for receiving alternative formats of materials.</p>	<p>Text was redrafted to state: '<i>Printed copies will be sent out within five working days of the request being made, where</i></p>

Local authority	Summary of responses received	Regard had to the responses
		<i>possible. Alternative format copies will be considered on a case-by-case basis and the timescales for these being sent out will be dependent on the specific request.'</i>
	Request to include details of how people can become involved in the DCO examination process.	The purpose of the SoCC was to publicise the consultation methodology. However, a brief explanation of the DCO examination process was added to section 2 of the SoCC.
	Request to include the questions for the consultation response form in the appendices for the SoCC.	The purpose of the SoCC was to publicise the consultation methodology and it was not appropriate to include the feedback form questions.
	The map showing newsletter distribution is unclear. Asked whether it includes Studham.	An updated newsletter mailing zone was shared for comment during the consultation on the SoCC. The updated zone was included as an appendix to the published SoCC. For further information see Section 5.3.4.
	Request to include a plan of the proposed DCO red line boundary in the SoCC.	The SoCC was updated to include this.
	Understand the rationale for a 'digital first' approach to consultation. Request for an explanation in the SoCC as to how the event locations have been selected and how they represent the 67hissible locations.	The 2022 statutory consultation was digitally led in response to the uncertainty over face-to-face engagement created by the Covid-19 pandemic and the desire to conduct the consultation in a sustainable way. The SoCC was updated to explain this.
Hertfordshire County Council	Suggest increasing the number of face-to-face consultation events. There are no events in areas of Hertfordshire, such as Hemel Hempstead and Letchworth Garden City.	There were 13 in-person events spread across a wide area. The attendance levels at each event in 2019 were considered when selecting the spread of events. The event locations were selected to provide a good geographical spread to enable affected communities across the area to attend. Site visits to assess

Local authority	Summary of responses received	Regard had to the responses
		<p>suitability were undertaken and this and factors such as venue capacity, and availability of parking all fed into the selection process. In addition all venues were subject to an accessibility check to ensure that they were suitable for those with mobility issues.</p> <p>The rationale for having a reduced number of in-person events compared with the 2019 consultation was added to section 3.3 of the SoCC.</p>
	<p>Suggest rewording paragraph 1.1.2 to clearly state that the Secretary of State makes a decision on the proposal.</p>	<p>Text reworded to clarify this point.</p>
	<p>Given the amount of consultation materials and supporting documentation, suggest extending the consultation period to be 10 or 12 weeks.</p>	<p>An eight-week consultation period was consistent with the approach taken in 2019. It also exceeds the statutory minimum 28 days required by the Act.</p>
	<p>Suggest rewording and ordering to section 1.1 regarding the 2019 SoCC and consultation for clarity.</p>	<p>Text reworded and re-ordered to clarify this point.</p>
	<p>Suggest rewording to 2.1.1 to avoid repetition.</p>	<p>Text reworded.</p>
	<p>Suggest rewording 2.1.7 for clarity.</p>	<p>Text reworded.</p>
	<p>Consider reinstating the full list of document inspection venues from the 2019 consultation. If not, provide an explanation as to why.</p>	<p>See response to comment by North Hertfordshire District Council above on the same matter.</p>
	<p>Request for the SoCC to explain why the face-to-face event venues have been selected to facilitate relatively easy access to venues, given the reduced number of venues.</p>	<p>The wording in 68his68onn 3.3 of the SoCC was updated to give more detail around the rationale for venue selection.</p>

Local authority	Summary of responses received	Regard had to the responses
	Request to clarify how the newsletter mailing zone has been spatially defined in the SoCC, including whether areas close to previously used event venues are included.	An updated newsletter mailing zone was shared for comment during the consultation on the SoCC. The updated zone was included as an appendix to the published SoCC. For further information see Section 5.3.4.
	Suggest including a commitment in section 5 to engage with local representative organisations concerned with the impacts of the existing airport.	Where appropriate, the Applicant was engaging with local representative organisations. However, there was no specific consultation-related engagement planned for these groups and therefore this was not relevant for the SoCC.
	Clarity is sought on the reference to engagement with traveller communities “We will offer to support local authorities to deliver face-to-face engagement with these groups”, as the council is willing to provide contacts but does not consider its role to deliver face-to-face engagement on behalf of LLAL.	Comment noted. Section 5.4 of the SoCC was updated to clarify that that the Applicant would undertake the engagement with traveller communities, drawing on the expertise of local authorities.
	Query as to why copies of printed materials will not be provided to other home library services, in addition to the Luton Home Library Service.	The SoCC was updated to include other Home Library Services within the host local authority areas for the Proposed Development.
	Clarify whether consultees can submit general comments in writing via the Freepost address, instead of the response form.	Text reworded to make it clear that freeform written responses would be accepted via Freepost or email.
	Request to include a plan of the proposed DCO red line boundary in the SoCC.	The SoCC was updated to include this.
Buckinghamshire County Council	Welcome the proposals to publicise the consultation widely. Request that all promotion comprehensively	An updated newsletter mailing zone was shared for comment during the consultation on the SoCC. The updated zone was

Local authority	Summary of responses received	Regard had to the responses
	<p>covers surrounding areas, including Buckinghamshire.</p>	<p>included as an appendix to the published SoCC. For further information see Section 5.3.4.</p>
	<p>Welcome the mixed approach to engagement, including virtual exhibitions and the inclusion of locations in Buckinghamshire for face-to-face events and document inspection venues. However, acknowledges that there are fewer physical locations than in 2019.</p>	<p>Comment noted.</p>
	<p>Request to see which venues in Buckinghamshire have been identified to help advertise the consultation so the Council can identify any gaps or potential venues.</p>	<p>The locations for posters to promote the consultation were still being identified at the time of consultation on the draft SoCC and the SoCC did not include this level of detail. However, the Applicant welcomed support from Buckinghamshire County Council in sharing details of the consultation via social media and other channels.</p>
	<p>Request for a virtual meeting to be held with Buckinghamshire Community Boards closest to the airport: Wing and Ivinghoe, Aylesbury, Wendover, Winslow and Villages and Chesham and Villages.</p>	<p>Elected members were invited to a briefing session ahead of the launch of the consultation, which included a demonstration of the virtual exhibition space. Those elected members representing the Buckinghamshire Community Boards were invited to a session. This level of detail was not included in the SoCC and therefore no change was made.</p>
	<p>Query when contact will be made with local authorities to brief them on the consultation and what would be required to ensure that the reach of consultation can be extended in their communities.</p>	<p>The Applicant prepared an approach for engaging elected members about the consultation. This included an invitation to a briefing session ahead of the consultation launch with a demonstration of the virtual exhibition space. This level of detail was not included in the</p>



Local authority	Summary of responses received	Regard had to the responses
		SoCC and therefore no change was made.
	Request for briefings with officers and elected members to be focused on potential impacts and benefits specific to Buckinghamshire.	The Applicant held technical meetings with relevant council officers as required. This ongoing engagement continued through to submission of the application for development consent and will continue through the examination process. This level of detail was not included in the SoCC and therefore no change was made.
	Suggest that the Buckinghamshire Local Enterprise Partnership and Buckinghamshire Business First business groups are identified within the SoCC.	Reference to both groups were added to the SoCC and they were contacted at the launch of the consultation.
	Suggest contacting educational establishments in Buckinghamshire as well as those in host local authority areas.	Schools and universities within the newsletter mailing zone received a poster pack. A request was made for contact details from Buckinghamshire County Council for educational establishments in Buckinghamshire that fall outside the mailing zone so they could be sent an email notification at the launch of the consultation, however no further information was received. This level of detail was not included in the SoCC and therefore no change was made.
	Encourage considering how digital literacy may be a limiting factor for some people.	The consultation was digital first, but traditional methods of engagement were still available, including printed copies available to be sent via post on request, in addition to those made available at the Document Inspection Venues and face-to-face events. No change was made to the SoCC.
	Airspace impacts are the principal concerns for BC. There is limited scope within	The purpose of the SoCC was to set out the approach to consultation, not to cover the

Local authority	Summary of responses received	Regard had to the responses
	the SoCC about the impacts of the scheme, including airspace impacts. Request for communication on how expansion will impact airspace, both in the present and future, and how residents will be able to engage in these matters.	content of the consultation. Details about airspace impacts, including future operations and flightpaths, were covered in the consultation materials.
Dacorum Borough Council	General support for the response by HCC to the SoCC consultation.	Noted.
	Concern at the reduced level of document inspection venues and face-to-face events. Request that the number of document inspection venues and events are reinstated to the same level as in 2019.	See response to comment by North Hertfordshire District Council above in respect of Document Inspection Venues. See response to comment by Central Bedfordshire/Hertfordshire County Council above in respect of in-person events.
	Request for a longer consultation period of 10 or 12 weeks to give people enough time to consider the proposals.	An eight-week consultation period was consistent with the approach taken in 2019. It also exceeds the statutory minimum 28 days required by the Act.
East Hertfordshire District Council	LLAL should make sure that the changes to the application boundary for the scheme would not require an update from the Planning Inspectorate in respect of the Environmental Impact Assessment (EIA) Regulations.	The Applicant had already sought clarification from the Planning Inspectorate who advised that no update was required. No change was required to the SoCC.
	Suggest adding wording to explain that access to consultation materials at document inspection venues is subject to them being operational, to account for any Covid-19 measures.	Text added to section 3.2.4 of the SoCC.
	Suggest including telephone numbers for each of the document inspection venues to enable people to check availability in advance.	Text added to section 3.2.4 of the SoCC.

Local authority	Summary of responses received	Regard had to the responses
	Suggest including a map of the document inspection venues as an appendix.	A map of the Document Inspection Venue locations was added as an appendix to the SoCC.
	Suggest rewording 4.3.3 to clarify that digital format advertisements will be available irrespective of hard copy availability.	Text reworded at section 4.3.3 of the SoCC to clarify.
	Request to reword of 5.4.4 to say that engagement with all traveller communities will be attempted, with a further statement on the need to reach those without permanent addresses as well as those who have. The onus should be on LLAL to deliver face-to-face engagement with travelling communities on the scheme, rather than local authorities. Local authorities could assist by advising LLAL on approaches for making contact, where resource is available.	Comment noted. Section 5.4 of the SoCC was updated to clarify that that the Applicant would undertake the engagement with traveller communities, drawing on the expertise of local authorities.
St Albans City and District Council	Disappointed in the reduction in consultation exercises compared with 2019.	See response to comment by Central Bedfordshire/Hertfordshire County Council above in respect of in-person events.
	Aircraft noise is a major issue for St Albans District residents.	An updated newsletter mailing zone was shared for comment during the consultation on the SoCC. The updated zone was included as an appendix to the published SoCC. For further information see Section 5.3.4.
	Request that similar efforts to those taken in 2019 are made to consult with the District's villages that face disturbance from being below or on the edge of a flight path, as a digital consultation will be	See response to comment by Central Bedfordshire/Hertfordshire County Council above in respect of in-person events.

Local authority	Summary of responses received	Regard had to the responses
	unlikely to reach all affected residents.	
	Request for consultation events held in the District to take place on a variety of times and days.	Consultation events were proposed on different days of the week including Saturdays and took place at different times of day including evenings. Document Inspection Venues were also used at locations throughout the mailing zone to broaden access. The virtual engage space allowed online access to the materials on a 24/7 basis throughout the consultation period.
	Request to increase the number of document inspection venues.	See response to comment by North Hertfordshire District Council above in respect of Document Inspection Venues.
	Request for a commitment from LLAL to hold public surgeries and community engagement events outside of the working day.	The consultation events were open until 20:00 to ensure that people are able to attend after working hours and three events were held on Saturdays. In addition to this, the virtual exhibition space was available 24/7.
Stevenage Borough Council	No substantive comments or objections to the SoCC. In broad agreement to the responses submitted by HCC and Dacorum Borough Council.	Noted.
	Support for Dacorum Borough Council's suggestion to extend the consultation period longer than eight weeks to give appropriate time for people to consider the proposals.	An eight-week consultation period was consistent with the approach taken in 2019. It also exceeds the statutory minimum 28 days required by the Act.

5.3.4 Appendix 2 of the draft 2022 SoCC shared for consultation on 6 August 2021 presented a newsletter mailing zone which reflected the area contacted during the 2019 statutory consultation. A copy of the draft 2022 SoCC, including the map in the appendix, can be found in **Appendix G**. Following the consultation on the draft 2022 SoCC, further technical work led to the newsletter mailing

zone being amended, the updated version was included in the final 2022 SoCC, also contained in **Appendix G**.

5.3.5 Whilst not part of the SoCC consultation, that updated newsletter mailing zone was shared with host and neighbouring authorities on 17 November 2021, with a deadline for providing any comments of 3 December 2021.

5.3.6 Five local authorities made comments on the amended mailing zone and these are set out in **Table 5.2** below. A copy of the response sent to all local authorities in response to the updated version of the newsletter mailing zone can be found in **Appendix G**.

Table 5.2: Comments on the draft 2022 SoCC Addendum and the regard had

Local authority	Summary of feedback received	Regard had to the feedback
Hertfordshire County Council	Suggest the mailing zone is extended to encompass settlements that have historically been impacted in some way by the airport	<p>A number of factors, including further technical work to identify the areas most affected by aircraft noise, have led to the newsletter mailing zone being significantly expanded. The mailing zone includes an additional 100,000 addresses, when compared with the zone contacted as part of the first statutory consultation in 2019.</p> <p>The newsletter mailout was just one of the different ways that the consultation was promoted. People who live and work in the area around the airport were also made aware of the consultation via:</p> <ul style="list-style-type: none"> <li>• posters in key community locations, such as supermarkets, places of worship and vaccination centres;</li> <li>• advertising in 20 local newspapers;</li> <li>• targeted social media advertising;</li> <li>• radio advertising on Heart FM;</li> <li>• public notices in 20 local newspapers, in addition to the Times and London Gazette;</li> </ul>

Local authority	Summary of feedback received	Regard had to the feedback
		<ul style="list-style-type: none"> <li>• posters shared with schools and educational establishments; and</li> <li>• contact with organisations representing hard-to-reach groups.</li> </ul> <p>This consultation was also ‘digital first’ to reflect the Applicant’s commitment to sustainability. This means that, where possible, the amount of printing had been reduced in favour of online materials and promotion. For these reasons, the newsletter mailing zone was not expanded further than in the version shared on 17 November, however the eventual newsletter mailing zone was larger than that consulted on in the draft SoCC, see Section 6.3.</p>
Bedford Borough Council	Comfortable with the updated mailing zone.	Comment noted.
	Requested for Luton Rising to engage with the Chief Executive and Mayor.	Comment noted and actioned outside of the SoCC consultation.
North Hertfordshire Council	Support the response from Hertfordshire County Council.	Comment noted.
	Request that the mailing zone is extended more north and eastwards, in particular Hitchin, Ickleford, Pirton, Howell and Ashwell. Support the extension of the zone towards Royston.	A number of factors, including further technical work to identify the areas most affected by aircraft noise, have led to the newsletter mailing zone being significantly expanded. The mailing zone now includes an additional 100,000 addresses, when compared with the zone contacted as part of the first statutory consultation in 2019.

Local authority	Summary of feedback received	Regard had to the feedback
Dacorum Borough Council	<p>Consider that, due to the reduction in non-digital engagement, there is a greater need for the mailing zone to be expanded.</p> <p>Suggest the mailing zone is extended to not cut through settlements, such as Berkhamsted and Hemel Hempstead.</p>	<p>The newsletter mailout was just one of the different ways that the consultation will be promoted. People who live and work in the area around the airport were also be made aware of the consultation via:</p> <ul style="list-style-type: none"> <li>• posters in key community locations, such as supermarkets, places of worship and vaccination centres;</li> <li>• advertising in 20 local newspapers;</li> <li>• targeted social media advertising;</li> <li>• radio advertising on Heart FM;</li> <li>• public notices in 20 local newspapers, in addition to the Times and London Gazette;</li> <li>• posters shared with schools and educational establishments; and</li> <li>• contact with organisations representing hard to reach groups.</li> </ul> <p>This consultation was also ‘digital first’ to reflect Luton Rising’s commitment to sustainability. This means that, where possible, the amount of printing was reduced in favour of online materials and promotion. For this reason, the newsletter mailing zone was not expanded further than in the version shared on 17 November 2021.</p>
Stevenage Borough Council	<p>Suggest widening the mailing zone to include the whole borough of Stevenage, including those areas that will be developed in time as and when they come forward.</p>	

## 5.4 Publicising the SoCC

5.4.1 In accordance with Section 47(6)(a) of the Act, newspapers notices were published setting out where and when the 2022 SoCC could be inspected. In addition to meeting the requirements of Section 47 of the Act, the same notice was used to publicise the proposed application in accordance with Section 48 of the Act and Regulation 4 of APFP Regulations 2009.

5.4.2 **Table 5.3** sets out the newspapers and dates on which the notices were published. Notices were published in accordance with the approach set out in the SoCC. Copies of the notices can be found in **Appendix H**.

Table 5.3: Newspapers with published statutory notices of 2022 statutory consultation

Newspaper	Date of notification publication	
London Gazette	8 February 2022	N/A
The Times	8 February 2022	N/A
Cambridge Evening News	8 February 2022	15 February 2022
Leighton Buzzard Observer	8 February 2022	15 February 2022
Bucks Herald	9 February 2022	16 February 2022
Luton News & Dunstable Gazette	9 February 2022	16 February 2022
Hemel Hempstead Gazette	9 February 2022	16 February 2022
Hunts Post	9 February 2022	16 February 2022
Welwyn & Hatfield Times	9 February 2022	16 February 2022
Barnet Borough Times	10 February 2022	17 February 2022
Hertfordshire Mercury	10 February 2022	17 February 2022
Herts Advertiser	10 February 2022	17 February 2022
Hitchin Comet	10 February 2022	17 February 2022
Letchworth & Baldock Comet	10 February 2022	17 February 2022
Milton Keynes Citizen	10 February 2022	17 February 2022
Royston Crow	10 February 2022	17 February 2022
Stevenage Comet	10 February 2022	17 February 2022
Biggleswade Chronicle	11 February 2022	18 February 2022
Bucks Free Press	11 February 2022	18 February 2022
Watford Observer	11 February 2022	18 February 2022

5.4.3 The 2022 SoCC was published at the start of the consultation on 8 February 2022 and was available for the duration of the consultation period. It was available to download free of charge from the project's consultation website and was also available in hard copy or USB upon request. **Figure 5.1** illustrates the SoCC available for download on the website. It was also available to view at the Document Inspection Venues and consultation events. All consultation materials and publicity contained contact details for how more information could be requested, see for example **Figure 5.2** illustrating contact details.



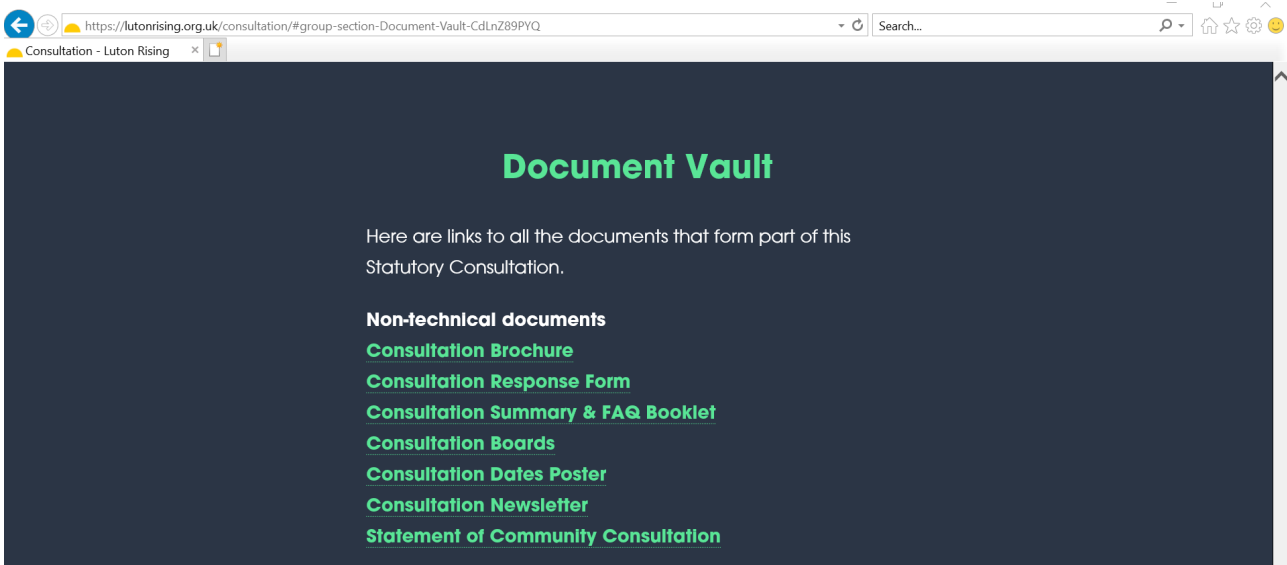


Figure 5.1: Screenshot of link to download the SoCC



Figure 5.2: Contact details illustrated in the Summary Brochure

## 5.5 Compliance with the SoCC

5.5.1 Section 47(7) of the Act requires the applicant to carry out consultation in accordance with the proposals set out in the SoCC. The 2022 SoCC outlined how the Applicant was going to consult those living in the vicinity of the

Proposed Development including residents, interest groups, businesses, and airport users.

5.5.2 Consultation was undertaken in accordance with the 2022 SoCC with the following exceptions:

- a. the Stevenage consultation event was scheduled to take place on Friday 18 February 2022, however due to red weather warnings for Storm Eunice being issued for parts of southern England on 17 February 2022, the event was postponed. This event was rescheduled for 15 March 2022 at the same venue. To make people aware that the event was rescheduled the website, subsequent newspaper adverts and social media posts were updated. Copies of the newspaper adverts are included in **Appendix K**.
- b. newsletters were sent to all properties within the newsletter mailing zone, however there was a slight delay in some properties receiving them. At the start of consultation it emerged that 4,852 properties on the edge of the newsletter mailing zone had been missed. These properties were delivered the newsletter by first class post on 15 February 2022 (46 days before the end of consultation). It also emerged that the village of Dagnall did not receive the newsletter at the start of the consultation period. All 214 properties in the village were delivered the newsletter by first class post on 24 February 2022 (37 days before the end of consultation), this was after one of the closest consultation events to the village (at Markyate) had taken place, however nearby events at Pitstone and Slip End were still to be held.

5.5.3 Notwithstanding the exceptions described above, all engagement methods set out in the 2022 SoCC were undertaken; the Applicant also undertook some additional engagement activities that were not set out in the SoCC, as follows:

- a. an additional consultation event was held on 28 March 2022 at the University of Bedfordshire. This sought to increase participation from younger people. The event also included a 'Question Time' session whereby the community could pose questions in advance which were answered by a panel. The 'Question Time' was live-streamed online. The event was advertised on the website, in press adverts and on social media. No new information was shared at this event which was not available at the preceding events.
- b. two additional pop up events were held at the airport and The Mall Shopping Centre in Luton during the consultation. Further information is set out in **Section 6.6**.
- c. the 2022 SoCC included a map of the newsletter mailing zone. The Royal Mail 'Mail Drop' service was used to deliver the newsletter. This service delivers to postcode areas. This meant that in addition to all properties within the newsletter mailing zone, the newsletter was also delivered to some properties located outside the newsletter mailing zone but within postcodes partially located inside the newsletter mailing zone, i.e. the final zone within which newsletters were delivered was larger than that in the 2022 SoCC. Further details are set out in **Section 6.4**.
- d. the 2022 SoCC did not specify that out of home advertising would be undertaken. Adverts were placed on local buses and this activity was

therefore in addition to the publicity set out in the 2022 SoCC. Further information can be found at **Section 6.8**.

- e. the 2022 SoCC specified that the Applicant would share press releases with local media to facilitate coverage but did not specify that the Applicant would create radio advertisements. Radio advertisements were played on local stations during the consultation and these were therefore over and above the approach set out in the 2022 SoCC. Further information can be found at **Section 6.8**.

5.5.4 Refer to **Section 6** for further information on how the 2022 statutory consultation was undertaken.

## **6 2022 STATUTORY CONSULTATION PROCESS**

### **6.1 Introduction**

6.1.1 This section describes the process that the Applicant undertook in respect of the 2022 statutory consultation.

### **6.1 Purpose of the consultation**

6.1.1 The aim of the 2022 statutory consultation was to gather views from the local community, Prescribed Consultees, local authorities, PILs, the wider public and all those within an interest in the Proposed Development in order to inform the development of proposals.

6.1.2 Views were specifically sought on:

- a. the Draft Need Case;
- b. how employment, skills, community and social benefits, and training opportunities could be maximised to help benefit neighbouring communities;
- c. the proposed design of the airport;
- d. the Getting to and from the airport – our emerging transport strategy document and how access to the airport by sustainable transport modes could be maximised;
- e. the proposed approach to construction and measures to minimise the effects of construction;
- f. the environmental effects of expansion and how they can be managed and mitigated;
- g. the GCG approach;
- h. the open space and landscaping proposals;
- i. the proposed compensation policies and measures; and
- j. the proposed Community First scheme.

### **6.2 When did the consultation take place?**

6.2.1 The 2022 statutory consultation took place over a period of eight weeks (56 days), between 8 February 2022 and 4 April 2022 inclusive.

### **6.3 Newsletter mailing zone**

6.3.1 Consultation was not geographically restricted to a specific area, with consultation open to anyone who wanted to respond.

6.3.2 However, a newsletter mailing zone was established in a defined area around the airport to notify those likely to be directly affected by the Proposed Development. The newsletter mailing zone was based on:

- a. the zone sent newsletters during the 2019 statutory consultation, excluding the areas around event venues that were not being used in the 2022 statutory consultation;
- b. 1km area around each of the 13 consultation events<sup>4</sup>;
- c. the areas identified as being most affected by aircraft noise from both arrivals and departures (areas with five or more aircraft movements per day under 4000ft (plus 1km buffer); and
- d. residential areas with a strong interest in the Proposed Development, including Luton.

6.3.3 The spatial extent of the 2022 statutory consultation newsletter mailing zone is shown on **Figure 6.1**.

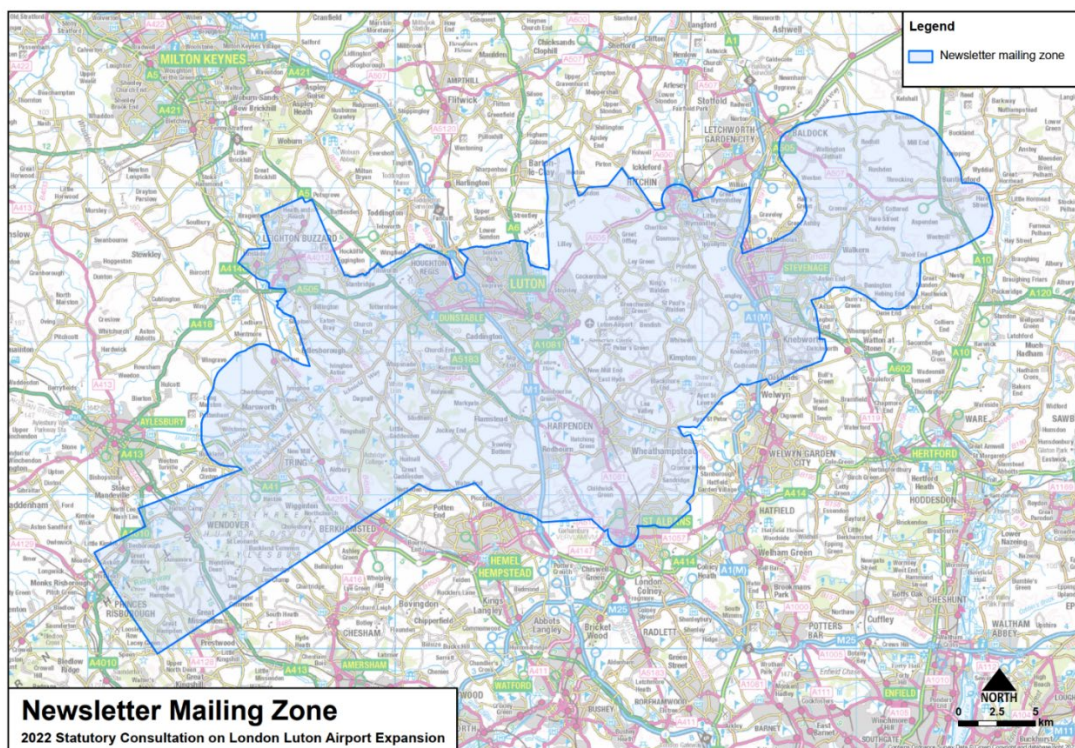


Figure 6.1: 2022 newsletter mailing zone as included in the SoCC

- 6.3.4 The Royal Mail ‘Mail Drop’ service was used to deliver the newsletter to all properties in the newsletter mailing zone at the start of the consultation period. This service delivers to postcode areas. This meant that the final zone within which newsletters were delivered was larger than that in the 2022 SoCC as illustrated in Figure 6.1.
- 6.3.5 At the start of consultation it emerged that 4,852 properties on the edge of the newsletter mailing zone had been missed. These properties were delivered the newsletter by first class post on 15 February 2022.

<sup>4</sup> A fourteenth consultation event was added during the consultation period, this fell within the newsletter mailing zone and therefore would not have affected the mailing zone had it been included from the start.

- 6.3.6 It also emerged that the village of Dagnall did not receive the newsletter at the start of the consultation period. The 214 properties in the village were delivered the newsletter by first class post on 24 February 2022.
- 6.3.7 In total 344,519 properties were sent newsletters (this included all properties inside the newsletter mailing zone plus all properties in postcode areas which are partially located inside the newsletter mailing zone). A copy of the newsletter can be found in **Appendix K**.
- 6.3.8 The area coloured on **Figure 6.2** below illustrates the areas which received a newsletter, overlaid with the Newsletter Mailing Zone included in the 2022 SoCC.

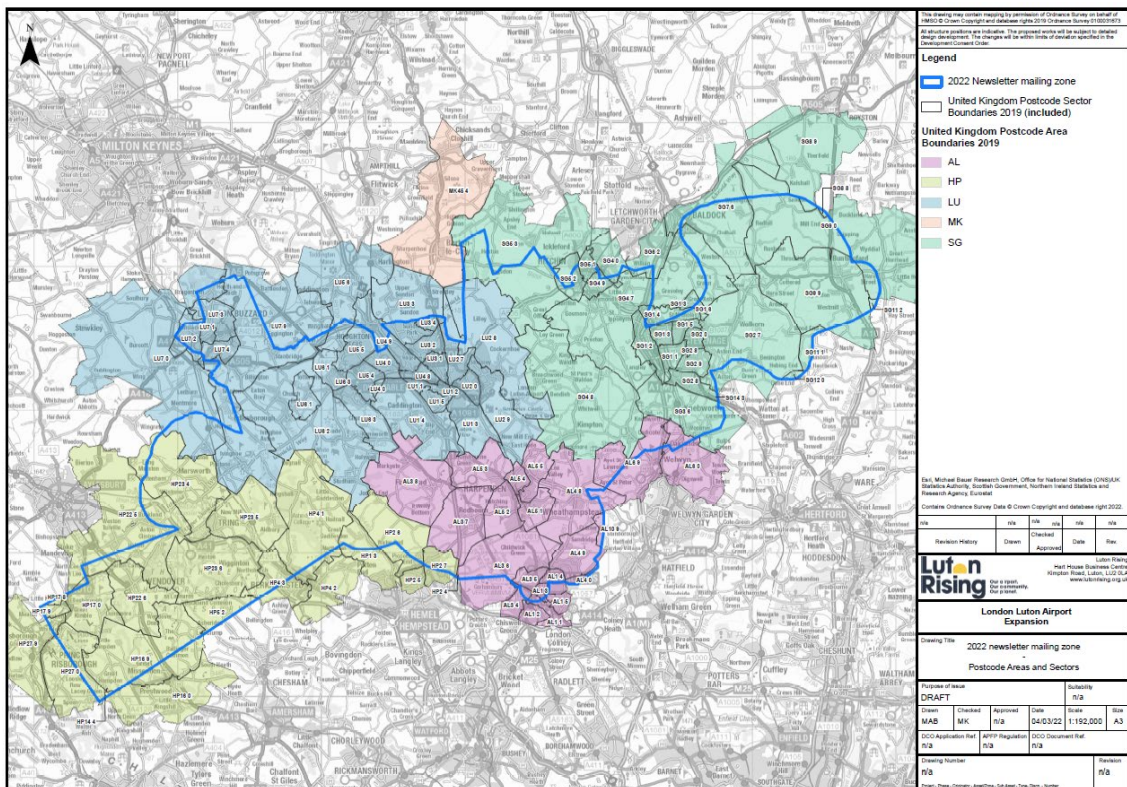


Figure 6.2: Final 2022 newsletter mailing zone

## 6.4 Who was consulted?

- 6.4.1 Under the requirements of the Act, consultation was held with particular stakeholders and groups, as outlined in Sections 42 and 47. Under Section 42 of the Act, the following groups were consulted:
  - a. Prescribed Consultees (Section 42(1)(a));
  - b. Local Authorities (Section 42(1)(b)); and
  - c. PILs (Section 42(1)(d)).

### **Prescribed Consultees (Section 42)**

- 6.4.2 The relevant Prescribed Consultees are listed in Schedule 1 of APFP Regulations 2009 (Ref 3). **Table 6.1** and **Table 6.2** below provide a list of the

Prescribed Consultees and relevant statutory undertakers consulted as part of the 2022 statutory consultation. Further information about these organisations including why they were consulted and contact information can be found in **Appendix I**.

6.4.3 The lists of Prescribed Consultees consulted in 2019 and 2022 are the same with the following exceptions:

- a. The Equality and Human Rights Commission and the Disabled Persons Transport Advisory Committee were consulted in 2022 on a precautionary basis but were not consulted in 2019.
- b. The United Kingdom Health Security Agency and the Office for Health Improvement and Disparities replaced Public Health England in 2021. The United Kingdom Health Security Agency took on the function of Prescribed Consultee in respect of the application for development consent and was therefore consulted in 2022 whereas in 2019 Public Health England was consulted.
- c. Highways England was replaced by National Highways in 2021. Therefore the relevant strategic highways company consulted in 2022 was National Highways and National Highways (Historic Railways Estate) whereas in 2019 Highways England – East was consulted.

Table 6.1: 2022 Prescribed Consultation bodies

Schedule 1 Description	Organisation
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS East and North Hertfordshire Clinical Commissioning Group
	NHS Bedfordshire, Luton and Milton Keynes Clinical Commissioning Group
	Hertfordshire Valleys Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Hertfordshire Fire and Rescue Service
	Bedfordshire and Luton Fire and Rescue Service
The relevant police and crime commissioner	Police and Crime Commissioner for Bedfordshire
	Police and Crime Commissioner for Hertfordshire
	King's Walden Parish Council

<b>Schedule 1 Description</b>	<b>Organisation</b>
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Offley Parish Council
	St Ippolyts Parish Council
	Hyde Parish Council
	Slip End Parish Council
The Environment Agency	The Environment Agency
The Equality and Human Rights Commission	The Equality and Human Rights Commission
The relevant AONB Conservation Boards	Chilterns Conservation Board
Homes and Communities Agency	Homes England
The Civil Aviation Authority	Civil Aviation Authority
Secretary of State for Transport	Secretary of State for Transport
Integrated Transport Authorities	Transport Focus
The Relevant Highways Authority	Luton Borough Council
	Central Bedfordshire Council
	Hertfordshire County Council
	Bedford Borough Council
	Milton Keynes Council
	Cambridgeshire County Council
	Essex County Council
	Buckinghamshire Council
	Harrow London Borough Council
	Hillingdon London Borough Council
	Barnet London Borough Council
	Enfield London Borough Council
	Mayor of London
The relevant strategic highways company	National Highways
	National Highways (Historic Railways Estate)
Transport for London	Transport for London
The Disabled Persons Transport Advisory Committee	The Disabled Persons Transport Advisory Committee
The relevant internal drainage board	Bedford Group of Internal Drainage Boards
United Kingdom Health Security Agency	United Kingdom Health Security Agency
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission – East and East Midlands
The Secretary of State for Defence	Ministry of Defence



Table 6.2: 2022 relevant statutory undertakers

<b>Statutory Undertaker</b>	<b>Organisation</b>
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
The relevant water and sewage undertaker	Affinity Water
	Thames Water
	South East Water Limited
	SES Water Limited
The relevant public gas transporter	Cadent Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Limited
	ESP Connections Ltd
	ESP Networks Limited
	ESP Pipelines Limited
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	Last Mile Gas Limited (previously Energetics Gas Limited)
	Scotland Gas Networks Plc
Southern Gas Networks Plc	
Southern Electric Gas Limited	
British Gas Trading Limited	
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Last Mile Electricity Ltd (previously Energetics Electricity Limited)
	Energy Assets Networks Limited

Statutory Undertaker	Organisation
	Energy Assets Fibre Networks Limited (previously Energy Assets Power Networks Ltd)
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks (Operations) Limited
	ESP Electricity Ltd
	South Eastern Power Networks
	National Grid Electricity
	National Grid PLC
	National Grid Electricity Transmission PLC
	National Grid Holdings Limited
National Grid Nemo Link (Nemo Link Limited)	
Relevant statutory undertaker (telecoms)	BT Group Plc
	Openreach Limited
Other	Prax Lindsey Oil Refinery Limited <sup>5</sup>
	Total UK Limited <sup>4</sup>

### **Local authorities**

6.4.4 The Proposed Development is located within the geographical boundaries of five host authorities (as defined under Section 43(1) of the Act) who were all notified of the consultation:

- a. Central Bedfordshire Council;
- b. Dacorum Borough Council;
- c. Hertfordshire County Council;
- d. LBC; and

<sup>5</sup> Prax and Total are not a statutory undertaker, but do have interests in a fuel pipeline. They were therefore consulted as a prescribed consultee as part of a precautionary approach.

e. North Hertfordshire District Council.

6.4.5 In addition, in accordance with Section 43(2) of the Act the following neighbouring authorities were also notified of the consultation, along with the Mayor of London:

- a. London Borough of Barnet;
- b. Bedford Borough Council;
- c. Buckinghamshire County Council;
- d. Cambridgeshire County Council;
- e. East Hertfordshire District Council;
- f. London Borough of Enfield;
- g. Essex County Council;
- h. London Borough of Harrow;
- i. London Borough of Hillingdon;
- j. Huntingdonshire District Council;
- k. Mayor of London;
- l. Milton Keynes Council;
- m. South Cambridgeshire District Council;
- n. St Albans City and District Council;
- o. Stevenage Borough Council;
- p. Three Rivers District Council;
- q. Uttlesford District Council; and
- r. Welwyn Hatfield Borough Council.

6.4.6 Dacorum Borough Council was consulted as a neighbouring authority in 2019 and a host authority in 2022. Following a review of draft Order Limits for the Proposed Development before the start of the 2022 statutory consultation it was identified that a small area of highway works within the draft Order Limits was located inside the Borough. The draft Order Limit red line was not amended between 2019 and 2022 and as such Dacorum Borough Council should have been consulted as a host authority, rather than neighbouring authority, in 2019. Three Rivers District Council was added as a neighbouring authority in 2022 as a result of Dacorum borough Council being consulted as a host authority. They were not consulted in the 2019 statutory consultation. Dacorum Borough Council and Three Rivers District Council were sent emails at the start of the 2022 statutory consultation making them aware of their status in the consultation. A copy of both emails can be found in **Appendix H**.

#### ***Persons with Interest in the Land***

6.4.7 The method for identifying PILs for the 2022 statutory consultation was identical to that used for the 2019 statutory consultation as described in **Section 4.5**. The only exception to this is that when undertaking the 2022 statutory consultation,

contact site visits were only conducted for land parcels where LIQs were not returned. This is opposed to the 2019 statutory consultation, where contact site visits were undertaken with all identified properties. This was because visits had already been carried out with the majority of PILs in 2019 meaning there was less reason to visit a second time. Additionally at this time social distancing due to the Covid-19 pandemic was in place.

- 6.4.8 Whilst the methodology adopted for identifying PILs was broadly the same, some of the assumptions used to establish the land referencing limits for the 2022 statutory consultation were different from those used for the 2019 statutory consultation (which are described in 4.5.7 above). These assumptions are set out below:
- a. as is explained more fully in paragraphs 11.2.9 to 11.2.12 below, ahead of the 2022 statutory consultation the decision was taken by the Applicant to incorporate the whole of the Airport Access Road (previously known as Century Park Access Road) into the Proposed Development. The addition of the whole of the road meant that the Order Limits were expanded and new PILs introduced who were consulted as new Category 1 and 2 PILs when compared to the consultation carried out in 2019;
  - b. the decision was also taken by the Applicant (partly as a consequence of responses received for the 2019 statutory consultation) to improve the proposed Noise Insulation Scheme. The 2019 statutory consultation was based on proposals which provided that eligibility for compensation commenced from a day time noise level of 57dB, whereas the proposals for the 2022 statutory consultation commenced from a day time level of 54dB. This change increased the number of properties which may be eligible under the new scheme. For the purposes of identifying Category 3 PILs, on a precautionary basis it was decided for the 2022 statutory consultation to include all PILs within the 54dB daytime noise contour, and so increased the number of potential Category 3 PILs compared to 2019.
- 6.4.9 As a result of these changes there was a significant increase in the total number of PILs who were identified and contacted as part of the 2022 statutory consultation as is confirmed in the following paragraph.
- 6.4.10 As part of the 2022 consultation, a total of 16,130 PILs were identified and contacted, as follows:
- a. Category 1 and 2: 459; and
  - b. Category 3: 15,671.
- 6.4.11 All PILs were sent a letter notifying them of the consultation. Additionally Category 1 and 2 PILs were sent a USB stick containing a copy of all consultation documents. A copy of the letters set to Category 1 and 2, and Category 3 PILs can be found in **Appendix H**.

### ***Section 47 consultees***

- 6.4.12 Under Section 47 of the Act, Applicants are required to consult with people “living in the vicinity of the land”. This includes local community consultees,

residents, interest groups, businesses and airport users. The Applicant carried out such consultation in accordance with the 2022 SoCC, as set out in **Sections 6.5 – 6.7** below.

## 6.5 Consultation methods

6.5.1 In accordance with the requirements of the Act, a range of methods and materials were employed to ensure that all consultees could take part.

### Consultation Materials

#### *Written information*

6.5.2 Information was provided during the 2022 statutory consultation electronically via the project's virtual exhibition room, on Luton Rising's website, and in hard copy at the Document Inspection Venues and at consultation events.

6.5.3 All materials were written in plain English. The materials comprised technical and non-technical documents, with the latter being written in a more informal and engaging style to ensure accessibility. Several of the technical documents also came with an easy to understand overview summarising the purpose and content of the document.

6.5.4 The Consultation Brochure included an overview of all the written materials available to help signpost consultees. A complete list of the consultation documents provided online (and via other means), and a brief explanation of their content is provided in **Table 6.3**. These documents are still available to view on the project website at: [www.lutonrising.org.uk/our-airport/future-luton/](http://www.lutonrising.org.uk/our-airport/future-luton/). Copies of the non-technical consultation materials can also be found in **Appendix J**.

Table 6.3: 2022 consultation documents

<b>Consultation documents</b>	
<b>Non-technical consultation materials</b>	
Consultation Brochure	The Consultation Brochure provided an overview of the scheme and how to respond to the consultation. It explained the rationale for growth and detailed the proposed expansion and mitigation measures.
Summary and FAQ	Contained a summary of the Consultation Brochure and Frequently Asked Questions.
Consultation Response Form	Form to give feedback on the Proposed Development. It contained a mixture of open and closed questions relating to the Proposed Development.
Consultation Boards	Consultation Boards provided consultees with visual and technical information concerning the Proposed Development. The Consultation Boards visually presented information contained in other consultation documents.

<b>Consultation documents</b>	
<b>Technical consultation documents</b>	
Draft Employment and Training Strategy	The Draft Employment and Training Strategy set out the strengths and needs of the local area around skills and training, the types of job opportunities expected to be created through expansion and the goals and the actions proposed to prepare the community to take advantage of the opportunities.
Draft GCG Proposals	Described the GCG approach, including the controls on four key categories of environmental impact: air quality, greenhouse gas emissions, aircraft noise, and surface access mode share.
Works Description Report	Described each of the Works which comprised the Proposed Development.
Getting to and from the Airport – our Emerging Transport Strategy	Provided information on the surface access proposals, including information on how people currently travel to the airport, targets for the future operation of the airport and the design of proposed interventions.
Preliminary Environmental Information Report (PEIR) including Non-Technical Summary	Reported the preliminary conclusions of Environmental Impact Assessment for the Proposed Development.
Draft Sustainability Statement	The Draft Sustainability Statement provided information on the sustainability commitments which would form part of the Proposed Development.
Draft Need Case	Provided information on the strategic and policy need for expansion, forecasts for passenger growth and capacity requirements at the airport and the economic benefits of expansion.
Draft Land Assembly Plans	Identified land required to deliver the Proposed Development.
Scheme Layouts	Drawings of the Proposed Development throughout construction and the final layout.
Draft Compensation Policies and Measures	Provided information on the compensation measures, including who qualifies and on the proposed Community First scheme.
Draft Equality Impact Assessment	Presented the preliminary conclusions of the Equality Impact Assessment for the Proposed Development
2019 Statutory Consultation Feedback Report	Detailed the feedback received during the 2019 statutory consultation and how the Applicant had responded.

- 6.5.5 In addition to the documents listed above, documents previously published for the 2018 non-statutory and 2019 statutory consultation remained accessible on the Luton Rising website.
- 6.5.6 The 2022 SoCC set out that requests for documents in alternative formats (such as translations, easy read, large print, or braille) would be considered where it was reasonably practical to do so.
- 6.5.7 The Newsletter, Consultation Brochure, Summary and FAQ and Consultation Response Form included text in seven of the most popular languages spoken by the local community. This translated text explained the purpose of the document and how more information in that language could be obtained. The following languages were included:
- a. Polish;
  - b. Bengali;
  - c. Lithuanian;
  - d. Urdu;
  - e. Punjabi;
  - f. Romanian; and
  - g. Gujarati.
- 6.5.8 Only one request was received for information to be translated into another language, this was a request for the Summary and FAQ booklet to be translated into Romanian. This request was fulfilled; the email was responded to in Romanian with a translated copy of the document alongside the original English version attached.
- 6.5.9 No requests were received for information in alternative formats.
- 6.5.10 Prescribed Consultees, host and neighbouring authorities and Category 1 and 2 PILs were sent a USB memory stick with the full suite of consultation documents. In accordance with the 2022 SoCC, documents were also made available upon request on USB memory stick. There were 44 requests for USBs to be posted which were all fulfilled.
- 6.5.11 Additionally, those without computer access could request a printed copy of materials. In total there were 23 requests for printed copies of materials including the Consultation Brochure, Summary and FAQ document, Consultation Response Form, Scheme Layouts and PEIR chapters. All requests were fulfilled.
- 6.5.12 The full suite of printed consultation documents was made available for purchase upon request. No such requests were received.
- Videos**
- 6.5.13 Videos were created and made available in the virtual exhibition room and the project website. They were also on display during the consultation events.

These provided an easy to understand introduction to key aspects of the Proposed Development. The following videos were available:

- a. overview of the case for the Proposed Development;
- b. overview of the design including flythrough visualisation;
- c. introduction to GCG;
- d. Wigmore Valley Park;
- e. stories from example community projects funded by Luton Rising;
- f. VISSIM transport modelling; and
- g. runway simulation visualisation.

### ***Consultation Response Form***

- 6.5.14 A Consultation Response Form was provided for anyone wishing to respond to the consultation, a copy of which can be found in **Appendix J**. It could be completed online via the virtual engagement room and website or in hard copy. Consultees were also able to complete and submit hard copy forms at the consultation events or via the FREEPOST address.
- 6.5.15 Consultees were asked to state whether they were an individual or responding on behalf of an organisation, where relevant.
- 6.5.16 Feedback was also accepted in the form of freeform letter or email.

## **6.6 Engagement methods**

- 6.6.1 To ensure the 2022 statutory consultation was inclusive and accessible to all, several communication channels were used. These are consistent with the 2022 SoCC.

### ***Virtual engagement room***

- 6.6.2 A virtual engagement room was live throughout the consultation period. This recreated the experience of visiting a physical consultation event. Visitors were able move around the room, read the Consultation Boards, watch videos, download all consultation documents free of charge and submit feedback online. See **Figure 6.3** for an example. Over the eight week consultation period there were 3,881 users of the virtual engagement room and 5,986 total views.



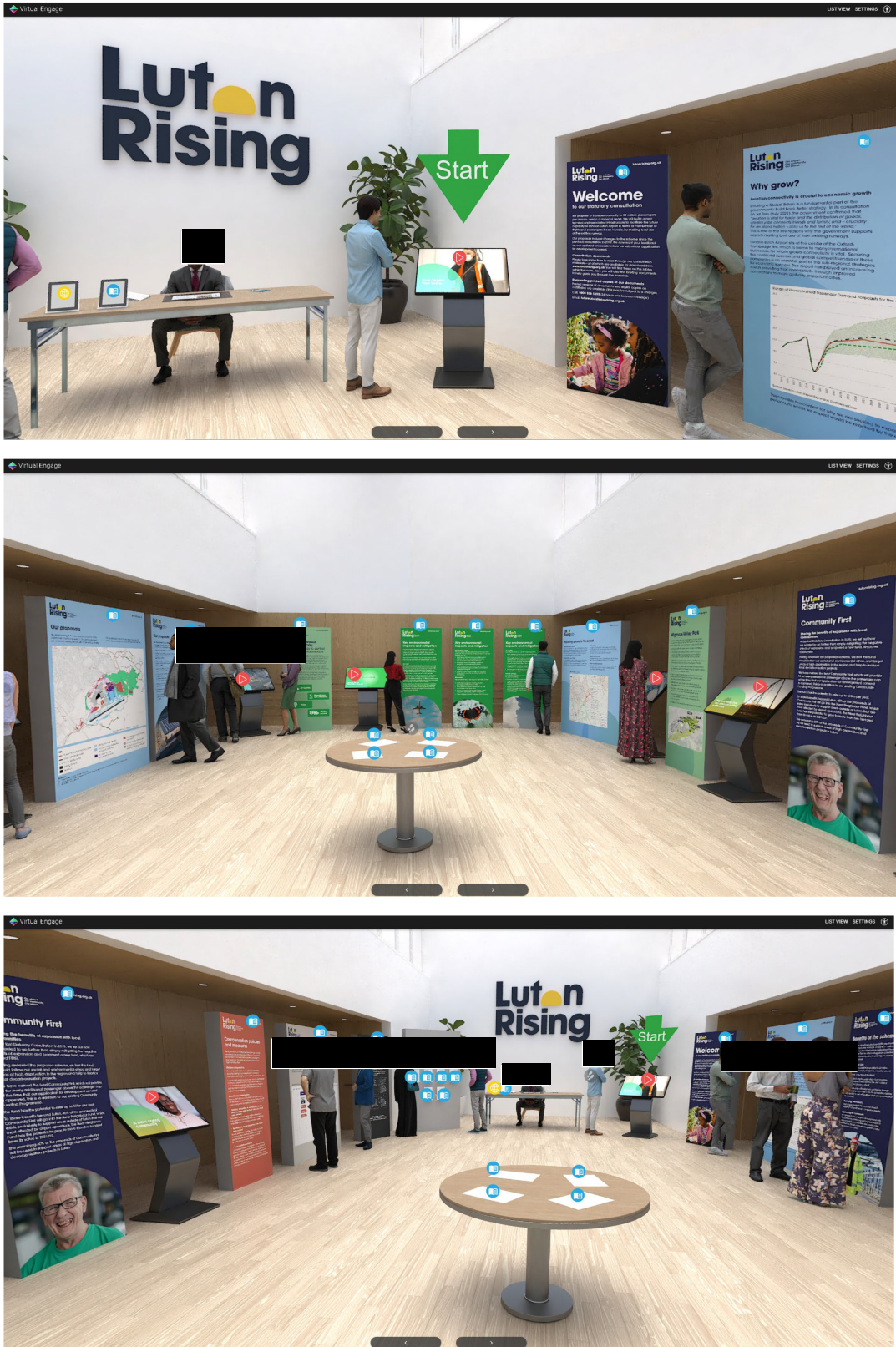


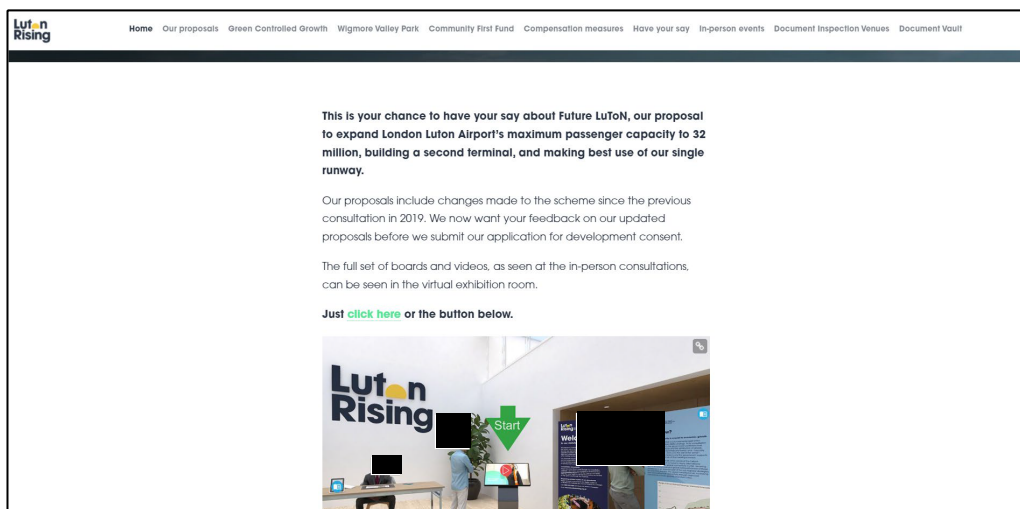
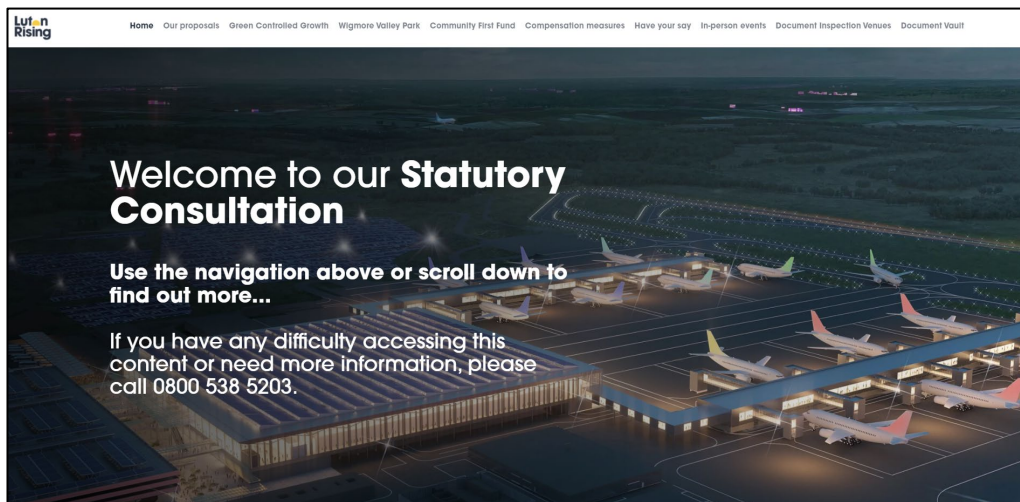
Figure 6.3: Screenshots of the Virtual Engagement Room

6.6.3 Within the virtual engagement room visitors were able to book a slot to speak to a member of the project team by telephone. Slots were available to book on

four days (covering a range of times of day) with a range of technical experts. Only one appointment was booked.

**Website**

- 6.6.4 A dedicated website was available from the start of the consultation period: LutonRising.org.uk. This remained live for the duration of the consultation period and provided the portal into the virtual engagement room. The website contained the written information described in **Table 6.3**, details of the consultation events, contact information and details of how to respond to the consultation.
- 6.6.5 The website was promoted through the notification methods, such as letters, leaflets and advertisements, discussed further in **Section 6.8**.
- 6.6.6 All consultation and publicity materials included a QR code providing a direct link to the website.



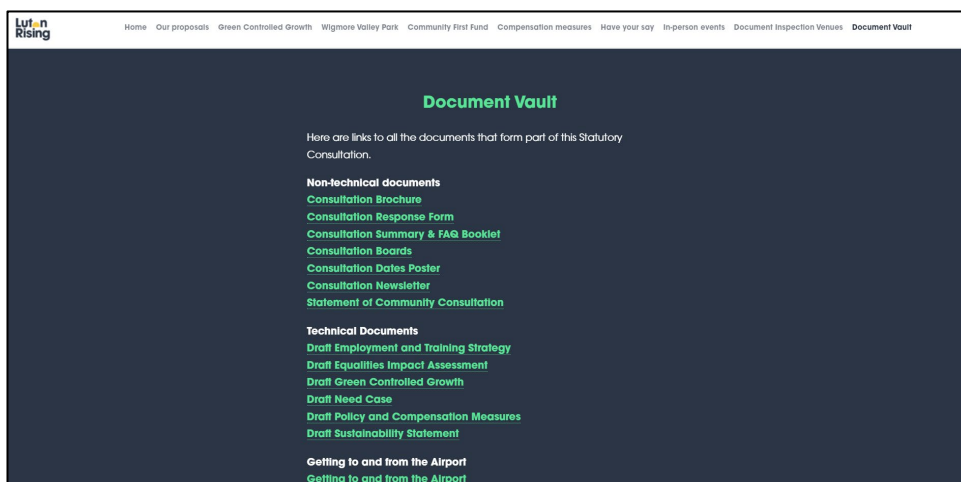
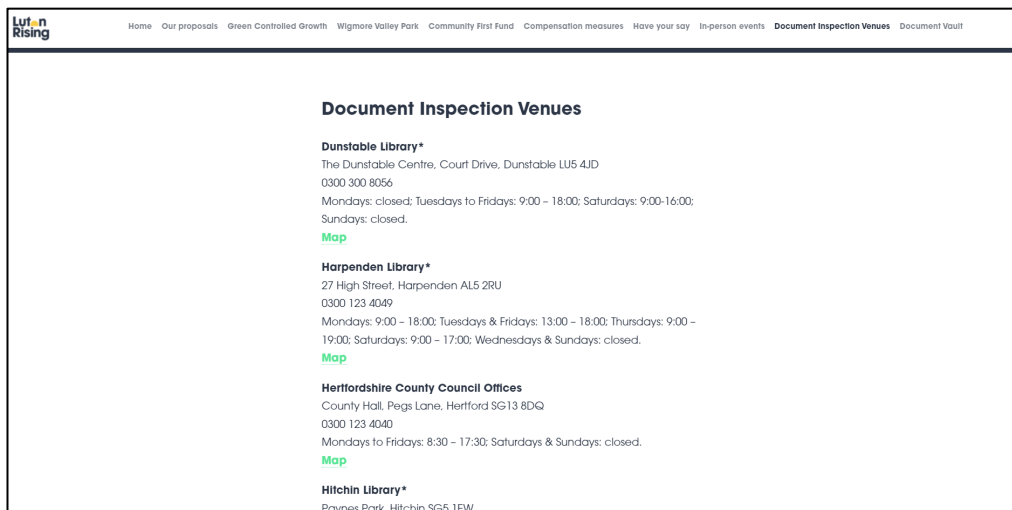
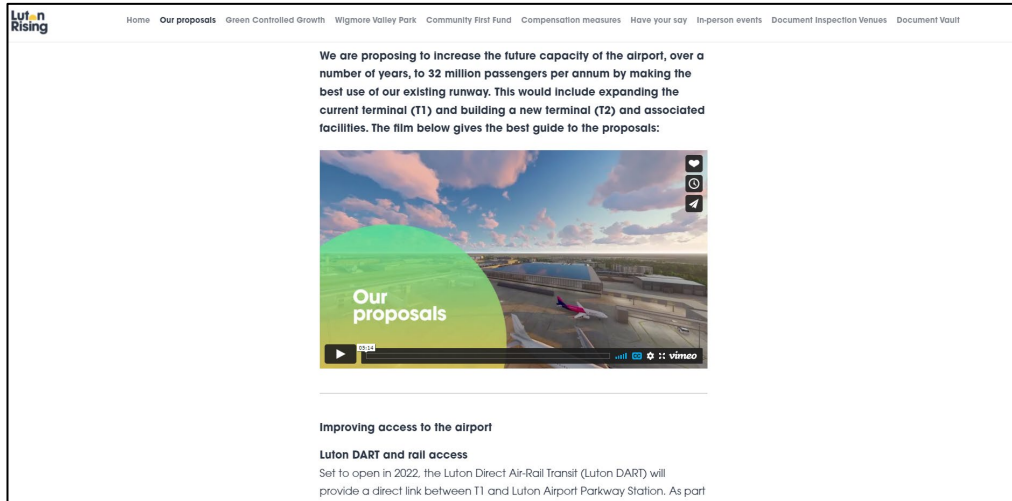


Figure 6.4: Screenshots of project website

6.6.7 Over the eight week consultation period there were 16,408 users of the website and 31,632 total views.

### ***Phoneline***

6.6.8 At the start of the consultation a freephone answerphone was launched. The phoneline was available for consultees to leave questions relating to the Proposed Development and ask for hard copies of consultation materials or USBs.

### ***Project email addresses***

6.6.9 Two Luton Rising email addresses were set up for the consultation. The first was to receive feedback to the consultation ([REDACTED]) and the second was for queries or to request further information ([REDACTED]). Both were available throughout the consultation period. Consultation responses received via email have been considered in the same way as those received through other channels.

### ***Consultation events***

6.6.10 In total, 14 consultation events were hosted at locations in the community. These events enabled members of the public to view the proposals, talk to members of the project team and complete the Consultation Response Form. Consultation Response Forms could either be completed at the event or taken away, completed, and returned via FREEPOST later.

6.6.11 The event venues were chosen in consultation with the host and neighbouring authorities. They were selected on the basis of their suitability as a community facility, their proximity to potentially affected communities, provision of disabled access, and their availability and popularity during the 2019 statutory consultation.

6.6.12 Details of the consultation events were provided on the project website, in newsletters and letters, locally displayed posters, press advertising and social media. In total 1,174 people attended the consultation events. **Table 6.4** provides details of the venue locations, dates and times of the consultation events as well as number of attendees.

Table 6.4: 2022 consultation events

<b>Date and time 2022</b>	<b>Area</b>	<b>Venue address</b>	<b>Number of attendees</b>
Tuesday 15 February 15:00-20:00	Luton	St Margaret of Scotland Church Hall 22a Bolingbroke Road, Luton LU1 5JD	45
Wednesday 16 February 15:00-20:00	Markyate	Markyate Village Hall Cavendish Road, Markyate AL3 8PS	50
Monday 21 February 15:00-20:00	Breachwood Green	Breachwood Green Village Hall	69

<b>Date and time 2022</b>	<b>Area</b>	<b>Venue address</b>	<b>Number of attendees</b>
		Chapel Road, Breachwood Green SG4 8NX	
Wednesday 23 February 15:00-20:00	Leighton Buzzard	Leighton Town Football Club Bell Close, Lake Street, Leighton Buzzard LU7 1RX	34
Friday 25 February 15:00-20:00	Pitstone	Pitstone Memorial Hall Vicarage Road, Pitstone LU7 9EY	48
Friday 4 March 15:00-20:00	Harpenden	The Eric Morecambe Centre Rothamsted Park, Harpenden AL5 2FR	164
Saturday 5 March 10:30-15:00	Slip End	Slip End Village Hall Markyate Road, Slip End LU1 4JW	122
Thursday 10 March 15:30-20:30	Hitchin	Hitchin Town Hall Brand Street, Hitchin SG5 1HX	120
Tuesday 15 March 15.00 – 20.00	Stevenage	Stevenage Arts and Leisure Centre Lytton Way, Stevenage SG1 1LZ	17
Wednesday 16 March 14:00-19:00	Tring	Victoria Hall Akeman Street, Tring HP23 6AA	68
Saturday 19 March 10:30-15:00	Whitwell	Whitwell New Fellowship Hall Bendish Lane, Whitwell SG4 8HT	53
Monday 21 March 15:00-20:00	St Albans	Jubilee Centre Catherine Street, St Albans AL3 5BU	119
Saturday 26 March 10:30-15:00	Luton	Wigmore Church and Community Centre Crawley Green Road, Luton LU2 9TE	207
Monday 28 March 15.00 – 20.00	Luton*	University of Bedfordshire, University Square, Luton, Bedfordshire LU1 3JU	58 (17 additional attendees also attended the Question Time and 23 people attended online)

\* Additional event



Figure 6.5: Photos of consultation events

6.6.13 In addition to the consultation events set out in the 2022 SoCC two additional pop up events were held as follows:

- a. at the airport on 30 March 2022; and
- b. at The Mall shopping centre in Luton on 31 March 2022.

6.6.14 At these pop up events, the introductory Consultation Board was on display and consultees were able to talk to a member of the Applicant team and take away copies of the Consultation Response Form, Consultation Brochure and Summary and FAQ.

## 6.7 Document Inspection Venues

6.7.1 Copies of all consultation materials including Consultation Response Forms were made available to view free of charge from the start of consultation and throughout at ten Document Inspection Venues. Copies of the Consultation Response Form were also provided for people to take away to complete. The venues were contacted via phone during the third and fifth weeks of the eight-week consultation period to check whether any additional materials were

needed, and materials were provided where necessary. The list of Document Inspection Venues during the consultation period is provided in **Table 6.5**.

Table 6.5: 2022 Document Inspection Venues

Document Inspection Venues	Opening Hours
Dunstable Library* The Dunstable Centre, Court Drive, Dunstable LU5 4JD 0300 300 8056	Mondays: closed; Tuesdays to Fridays: 9:00 – 18:00; Saturdays: 9:00-16:00; Sundays: closed.
Harpenden Library* 27 High Street, Harpenden AL5 2RU 0300 123 4049	Mondays: 9:00 – 18:00; Tuesdays & Fridays: 13:00 – 18:00; Thursdays: 9:00 – 19:00; Saturdays: 9:00 – 17:00; Wednesdays & Sundays: closed.
Hertfordshire County Council Offices County Hall, Pegs Lane, Hertford SG13 8DQ 0300 123 4040	Mondays to Fridays: 8:30 – 17:30; Saturdays & Sundays: closed.
Hitchin Library* Paynes Park, Hitchin SG5 1EW 0300 123 4049	Mondays: 13:00 – 18:00; Tuesdays: 10:00 – 19:00; Thursdays & Fridays: 10:00 – 18:00; Saturdays 10:00 – 17:00; Wednesdays & Sundays: closed.
Leighton Buzzard Library* Lake Street, Leighton Buzzard LU7 1RX 0300 300 8059	Tuesdays to Fridays; 9:00 – 18:00; Saturdays: 9:00 – 16:00; Mondays & Sundays: closed.
Luton Central Library* St George's Square, Luton LU1 2NG 01582 547 418	Mondays: 9:00 – 19:00; Tuesdays to Fridays: 9:00 – 18:00; Saturdays: 9:30 – 17:00; Sundays: 11:00 – 17:00.
North Hertfordshire District Council Offices Gernon Road, Letchworth Garden City SG6 3JF 01462 474 000	The Customer Service Centre was open for essential appointments Mondays to Fridays 09:00 – 17:00; Saturdays, Sundays & Bank Holidays: closed. A specific option was added to their online booking form for people to book to come in and view the consultation documents.
Stevenage Central Library* Southgate, Stevenage SG1 1HD 0300 123 4049	Mondays: 10:00 – 19:00; Tuesdays to Fridays: 10:00 – 18:00; Saturdays: 10:00 – 17:00; Sundays: 12:00 – 16:00.
Stopsley Library* Hitchin Road, Luton LU2 7UG 01582 706 368	Mondays, Tuesdays, Thursdays & Fridays: 9:00 – 17:00; Wednesdays: 13:00 – 18:00; Saturdays 9:30 – 13:00; Sundays: closed.
Wendover Community Library* High Street, Wendover HP22 6DU 01296 382 415	Tuesdays: 9:30 – 18:30; Thursdays & Fridays: 9:30 – 17:00; Saturdays: 9:30 – 16:00; Mondays, Wednesdays & Sundays: closed.

\*These venues offered free internet and/or computer access to those who are unable to view documents online at home but wish to do so. Some venues required a computer to be booked in advance.

## 6.8 Notification

### *Letters*

- 6.8.1 In accordance with the 2022 SoCC Prescribed Consultees as defined under Section 42 of the Act, local authorities and PILs, received consultation letters and a USB stick at the start of the consultation period, formally notifying them of the start of consultation and providing further detail on the Proposed Development and how they could engage with the consultation process.
- 6.8.2 A copy of the letter sent to Prescribed Consultees and local authorities along with the Section 47/48 notice which accompanied it can be found in **Appendix H**. The copy of the Section 48 notice was included in the consultation packs set to the consultee bodies, those falling within Section 42(1)(a)-(c), in order to comply with Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
- 6.8.3 A copy of the letter sent to PILs along with the Section 47/48 notice which accompanied it can also be found in **Appendix H**. Two different types of letters were sent to PILs; one for Category 1 and 2 in the Act, and another for Category 3. Copies of both letters are included in **Appendix H**. The Section 47/48 notice was also included with the letter. In accordance with the 2022 SoCC letters were sent to all PILs, including those identified as a result of the changes made to the Proposed Development after the 2019 statutory consultation.
- 6.8.4 In accordance with Section 46 of the Act a letter was sent to the Secretary of State on 4 February 2022 notifying them of the start of consultation. A copy of this letter can be found in **Appendix H**.
- 6.8.5 During the initial weeks of the 2022 statutory consultation period two of the consultation documents – the Draft Compensation Policies and Measures document and Draft Needs Case – were updated to correct minor errors. As a precautionary measure a letter was sent by Royal Mail on 4 March 2022 (31 days before the end of consultation) to all Prescribed Consultees, local authorities and PILs notifying them of the update and providing links to the updated documents available to download on the website. A copy of this letter, which describes the minor corrections made, can be found in **Appendix H**.

### *Statutory notices*

- 6.8.6 To comply with the requirements of Section 47 and Section 48 of the Act, in particular the duty to publicise the consultation, and the approach set out in the 2022 SoCC, statutory notifications were placed in newspapers at the start of the consultation period. These notices provided details of the consultation, including the Document Inspection Venues and the duration of the consultation period. **Table 5.3** in Section 5 provides a list of the newspapers which featured published notices of consultation and the date of publication. Copies of the statutory notices can be found in **Appendix H**.
- 6.8.7 Site notices were also placed in the vicinity of the airport, photos of which can be found in **Appendix H**.



## ***Newsletters***

- 6.8.8 In accordance with the 2022 SoCC at the commencement of the consultation period, a newsletter detailing the Proposed Development, consultation events and how stakeholders could engage with the proposals was sent to properties in the vicinity of the Proposed Development. Further information can be found in **Section 6.3**.

## **Advertising and publicity**

### ***Posters***

- 6.8.9 Posters advertising the 2022 statutory consultation were sent to 586 locations within Luton and the surrounding areas in accordance with the 2022 SoCC. The poster described the Proposed Development, consultation events and how consultees could engage with the proposals. Posters were sent to the following locations:
- a. local libraries within the Newsletter Mailing Zone;
  - b. community centres within the Newsletter Mailing Zone;
  - c. places of worship within the Newsletter Mailing Zone;
  - d. venues where events were held;
  - e. parish councils within host and neighbouring authorities;
  - f. supermarkets within the Newsletter Mailing Zone;
  - g. post offices within the Newsletter Mailing Zone;
  - h. Covid vaccination centres within the Newsletter Mailing Zone;
  - i. foodbanks within the Newsletter Mailing Zone;
  - j. the airport; and
  - k. contacts identified that work with or can reach out to hard to reach groups.
- 6.8.10 A full list of the locations which received posters along with a copy of the poster can be found in **Appendix K**.

### ***Print advertisements***

- 6.8.11 In addition to the statutory notices, advertisements were placed in local newspapers throughout the consultation period. **Table 6.6** describes the newspapers and dates of hard copy adverts. In addition, the online versions of these newspapers displayed banners advertising the 2022 statutory consultation between 8 February and 4 April 2022. These print advertisements were in accordance with the 2022 SoCC.

Table 6.6: 2022 print advertisements

<b>Newspaper</b>	<b>Date of advert publication</b>				
Luton News	2 Feb	9 Feb	16 Feb	2 Mar	23 Mar
Biggleswade Chronicle	4 Feb	11Feb	18 Feb	4 Mar	25 Mar

Newspaper	Date of advert publication				
Hemel Hempstead Gazette and Express	2 Feb	9 Feb	16 Feb	2 Mar	23 Mar
Leighton Buzzard Observer	1 Feb	8 Feb	15 Feb	1 Mar	22 Mar
Milton Keynes Citizen	3 Feb	10 Feb	17 Feb	3 Mar	24 Mar
Bucks Herald	2 Feb	9 Feb	16 Feb	2 Mar	23 Mar
Hitchin Comet	3 Feb	10 Feb	17 Feb	3 Mar	24 Mar
Letchworth Comet	3 Feb	10 Feb	17 Feb	3 Mar	24 Mar
Stevenage Comet	3 Feb	10 Feb	17 Feb	3 Mar	24 Mar
Welwyn & Hatfield Times	2 Feb	9 Feb	16 Feb	2 Mar	23 Mar
Herts Advertiser	3 Feb	10 Feb	17 Feb	3 Mar	24 Mar
Royston Crow	3 Feb	10 Feb	17 Feb	3 Mar	24 Mar
Hunts Post	2 Feb	9 Feb	16 Feb	2 Mar	23 Mar
Watford Observer	4 Feb	11 Feb	18 Feb	4 Mar	25 Mar
Barnet & Potters Bar Times	3 Feb	10 Feb	17 Feb	3 Mar	24 Mar
Cambridge News*	31 Jan	7 Feb	14 Feb	28 Feb	21 Mar
Hertfordshire Mercury	3 Feb	10 Feb	17 Feb	3 Mar	24 Mar

\* Publishes every weekday and on Saturdays, bookings were placed to appear on one day each week on the weeks commencing listed in the table.

6.8.12 A copy of the newspaper advert can be found in **Appendix K**, along with the web banners used in online editions. Photos of examples of the adverts in newspapers can also be found in **Appendix K**.

6.8.13 The newspaper advert was updated to include the rescheduled date for the Stevenage consultation event after it was cancelled due to a Red Weather Warning, a copy of the newspaper with the rescheduled date can be found in **Appendix K**.

### ***Out of home advertising***

6.8.14 Adverts were placed on local buses as follows:

- a. sides of ten double decker buses in Bedford from 14 February to 13 March 2022;
- b. rears of ten buses in Stevenage from 21 February to 20 March 2022; and
- c. rears of 14 buses in Luton from 21 February to 20 March 2022.



Figure 6.6: Copy of bus advertisement

- 6.8.15 The 2022 SoCC did not specify that out of home advertising would be undertaken, this activity was therefore in addition to the publicity set out in the 2022 SoCC.

### ***Radio advertisements***

- 6.8.16 Radio adverts were played on Heart FM between 8 February and 3 April 2022. A 30 second advert was played 307 times in total during this period. Adverts were also played on local community radio stations and streaming services.
- 6.8.17 The 2022 SoCC specified that the Applicant would share press releases with local media to facilitate coverage but did not specify that the Applicant would place radio advertisements. These radio advertisements were therefore over and above the approach set out in the 2022 SoCC.

### ***Press releases***

- 6.8.18 Press releases were shared with journalists to facilitate coverage in national and local print, radio and television media. The following press releases were made:
- a. 2 February 2022 – Announcement of consultation dates;
  - b. 8 February 2022 – Launch of consultation;
  - c. 17 February 2022 – Stevenage event postponed; and
  - d. 5 April 2022 – Close of consultation.

- 6.8.19 Copies of the press releases can be found in **Appendix K**.

### ***Online and social media, including paid-for media adverts***

- 6.8.20 The consultation was promoted using various social media channels, including Twitter (@LutonRising), Facebook (@LutonRising) and Instagram (@LutonRising) accounts. Posts included details of the Proposed Development and encouraged users to visit the project website and provide feedback.
- 6.8.21 Host and neighbouring authorities were also asked to use their own social media channels to promote the consultation.

6.8.22 Geographically targeted paid-for advertising was used on social media (including Twitter and Facebook) to encourage the local community and stakeholders to participate in the consultation. In total there were 594,429 views of the adverts on social media.



Figure 6.7: Examples of social media advertising

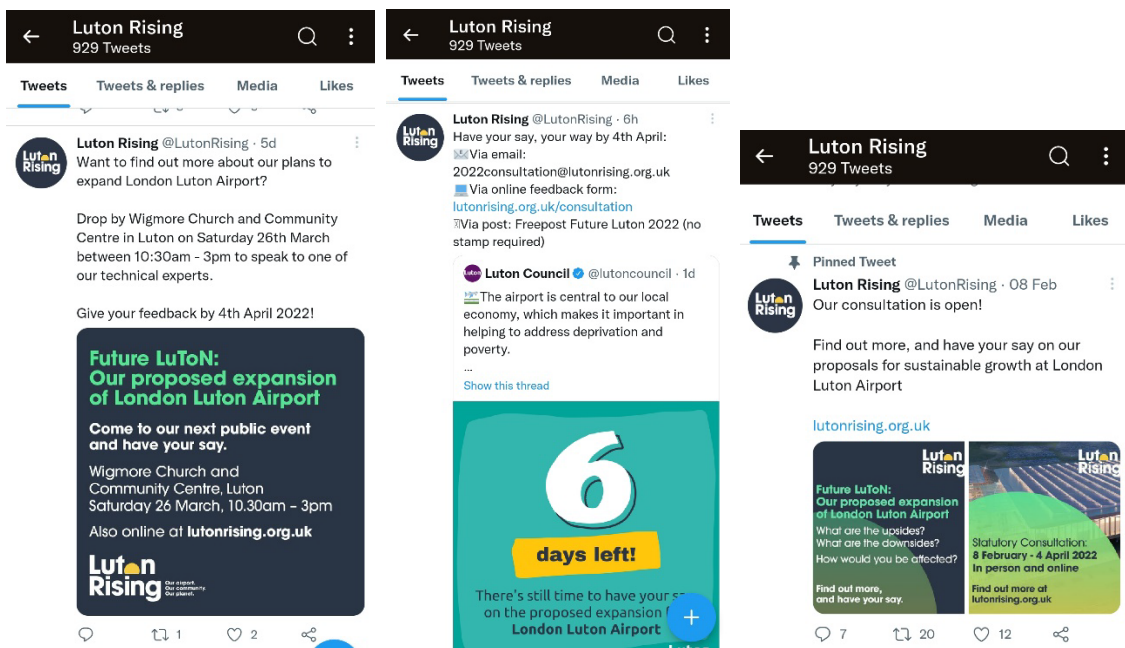


Figure 6.8: Examples of social media posts

***Parish and district council websites, newsletters and noticeboards***

6.8.23 In accordance with the 2022 SoCC, information was submitted to host authorities and parish councils within each host authority area to include in their newsletters and websites. Where parish councils allowed advertisements in their newsletters, space was sought for advertisements. Parish councils were also sent posters to include on their notice boards as above.

## ***Email***

- 6.8.24 In accordance with the 2022 SoCC stakeholders, including businesses, and community and interest groups were sent an email notification at the commencement of the consultation period. Emails provided consultees with details of the consultation process, including Document Inspection Venues, event times and the duration of the consultation period. A copy of the email can be found in **Appendix K**. A list of the community and interest groups contacted at the start of the 2022 Statutory Consultation can also be found in **Appendix K**.
- 6.8.25 Consultees who responded to the 2018 non-statutory consultation and 2019 statutory consultation were also emailed to notify them of the 2022 statutory consultation.

## **6.9 Local authority briefings**

- 6.9.1 In the fortnight before the start of the consultation, two additional wider group briefings were held. The briefings covered the approach to the 2022 statutory consultation and its content. The authors of each consultation document attended to explain to officers the purpose and content of each consultation document, and answer any questions.
- 6.9.2 The first briefing was held on 26 January 2022 and was attended by 16 officers from the following local authorities:
- a. Central Bedfordshire Council;
  - b. St Albans City and District Council;
  - c. Bedford Borough Council;
  - d. LBC;
  - e. East Herts District Council;
  - f. Buckinghamshire Council;
  - g. North Hertfordshire District Council;
  - h. Chilterns Conservation Board;
  - i. Hertfordshire County Council;
  - j. Dacorum Borough Council; and
  - k. Stevenage Borough Council.
- 6.9.3 The second briefing session was held on 2 February 2022 and was attended by 12 officers from the following local authorities:
- a. Central Bedfordshire Council;
  - b. St Albans City and District Council;
  - c. LBC;
  - d. Buckinghamshire Council;
  - e. North Hertfordshire District Council; and

a. Welwyn Hatfield Borough Council.

- 6.9.4 A separate briefing session was held with Dacorum Borough Council on 24 March 2022 to provide an overview of changes since the 2019 statutory consultation, discuss the nature of the information available during consultation including the PEIR and answer any questions.
- 6.9.5 An additional briefing session was held on 1 March 2022 with WSP who were appointed by the host authorities<sup>6</sup> to review and comment on the consultation documents, in particular the PEIR. This session provided an overview of the PEIR, a summary of the changes since the 2019 statutory consultation, and contact details of the Applicant's technical specialist leads. WSP's technical specialists were also contacted directly by the relevant project team member to offer topic specific meetings or answer questions via email.
- 6.9.6 Additional briefing sessions were offered to the POCG and WSP during the consultation period to answer any questions. On 28 March 2022 the POCG and WSP confirmed that they were satisfied that their queries had been resolved and if there were any further queries and clarifications, WSP would contact the relevant project team member directly.

## 6.10 Elected members and councillors

- 6.10.1 In accordance with the 2022 SoCC Members of Parliament covering the host and neighbouring authority areas were invited to discuss the consultation with a member of the project team before the start of consultation. Bilateral meetings with MPs were held with the following MPs in the four months prior to the start of the 2022 statutory consultation: Sarah Owen MP (Luton North), Rachel Hopkins MP (Luton South), Richard Fuller MP (North East Bedfordshire), Gagan Mohindra MP (South West Hertfordshire) and Bim Afolami MP (Hitchin and Harpenden).
- 6.10.2 Councillors from host and neighbouring authorities were invited to briefing sessions held at the start of the consultation. Online briefings explaining the scope of the consultation and how to engage were held on 19, 20 and 24 January 2022. Councillors of parish councils categorised as statutory consultees under the Act as well as parish councils who responded to the 2019 statutory consultation were also invited to attend briefings prior to the start of the 2022 statutory consultation. Online briefings for parish councillors explaining the scope of the consultation and how to engage were held on 27 January and 1 February 2022.
- 6.10.3 Online meetings were also held with Luton's Labour Policy Group and Luton's Liberal Democrat Policy Group.
- 6.10.4 Members of Parliament for the host and neighbouring authorities were also sent an email at the start of the 2022 statutory consultation making them aware of the consultation and how they could engage. An email with the same

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<sup>6</sup> Note this did not include Dacorum Borough Council who were identified as a host authority shortly before the 2022 statutory consultation and submitted their own response.

information was also sent to local councillors in the host and neighbouring authorities, and parish councillors.

## 6.11 Businesses

- 6.11.1 In accordance with the 2022 SoCC businesses and groups representing businesses were contacted during the consultation period and encouraged to engage.
- 6.11.2 Local businesses and groups representing businesses were sent an email at the start of the consultation period making them aware of the consultation and how they could engage. This included the South East Midlands Local Enterprise Partnership (SEMLEP), Hertfordshire Local Enterprise Partnership, Buckinghamshire Local Enterprise Partnership, Buckinghamshire Business First, Oxford-Cambridge Arc, and England's Economic Heartland.
- 6.11.3 Additionally during the consultation period, information about the consultation and how to engage was shared at meetings with the following business groups:
- a. Chamber of Commerce – online meeting;
  - b. Bury Park Business Leaders Forum – Venue Central, Luton; and
  - c. Luton Business Improvement District Board – The Mall shopping centre, Luton.

## 6.12 Hard to reach groups

### *Identifying hard to reach groups*

- 6.12.1 A consultation strategy for hard to reach groups was prepared in advance of the 2022 statutory consultation, a copy of which is available in **Appendix K**. This document set out the approach to engaging with hard to reach groups during consultation.
- 6.12.2 The following approach was taken to identify the relevant hard to reach groups and stakeholders:
- a. review of responses to the 2019 statutory consultation and the 2018 non-statutory consultation to identify any hard to reach organisations that responded previously;
  - b. work with the Applicant's Equality Impact Assessment team to understand what groups their work to date had identified;
  - c. request up-to-date lists of hard to reach groups from the host authorities during preparation of the strategy and again at the start of consultation; and
  - d. carry out desktop research to identify groups who could be impacted by the Proposed Development or have an interest in the Proposed Development.
- 6.12.3 The approach to engaging these groups was discussed with the POCG.

### ***Hard to reach engagement***

- 6.12.4 At the start of consultation an email was sent to organisations that represent hard to reach groups, with an overview of the consultation and the deadline for responding; a copy of this email is contained in **Appendix K**, along with a list of the organisations contacted. This encouraged contacts to respond to the email if they would like further information or alternative copies of consultation materials that could help the group to engage with the consultation. The email also requested that details of the consultation were shared in any relevant newsletters or social media pages to help reach a wider audience. This correspondence was followed up with a phone call to check that they had received the email/newsletter (if they are within the Newsletter Mailing Zone) and to offer additional information and alternative copies of materials. During the consultation period each group was called three times to offer support. **Table 6.7** describes the targeted engagement with hard to reach groups.

Table 6.7: 2022 targeted engagement with hard to reach groups

<b>Group</b>	<b>Method</b>	<b>Description</b>
Minority groups	Promotional packs and local community events	<p>Key locations, such as community centres and places of worship, in wards within the Newsletter Mailing Zone that have a diverse population were identified. They were sent promotional packs with posters and encouraged to display these.</p> <p>Information was included on non-technical consultation materials in seven different languages.</p> <p>Meetings were also held with community groups, many of which represented hard to reach communities, see below for more information.</p>
People with disabilities	Home library service and local community events	<p>Printed copies of consultation documents were provided to the Luton Home Library Service so that people who were not able to visit document inspection venues or events could, on request, receive printed copies of the materials at home alongside other books.</p> <p>In total 23 requests for printed copies of consultation materials were received and fulfilled. No requests were received for materials in alternative formats. Requests could be made by calling, emailing, or writing to the project team.</p>
Traveller communities	Newsletter	The expertise of host authorities was drawn on to help ensure that, where possible, traveller communities within the Newsletter Mailing Zone received a printed



Group	Method	Description
		or digital copy newsletter to advertise the consultation and events.
Young people	Promotional packs and youth campaign	Schools, colleges and universities within the host authorities and Newsletter Mailing Zone were contacted to share promotional packs to advertise the consultation to students.  A youth campaign was also held, see below for further information.
Working families	Consultation event timings	In-person consultation events were scheduled for evenings and weekends, as well as during the day, to ensure that working families had an opportunity to attend. The virtual engagement room was available to access 24/7.
Rural communities	Parish council engagement	Parish and town councils within the Newsletter Mailing Zone were sent promotional packs and encouraged to advertise the consultation to residents. Local Parish councillors were also invited to briefings.
All	Digital information	A social media and promotional campaign was run to capture a variety of local groups.

### ***Additional local community events***

6.12.5 Information about the consultation and how to respond was shared at the following online meetings held during the consultation period:

- a. Luton's faith and community leaders meeting;
- b. Luton community fora (charities and community groups across Luton);
- c. a meeting of Luton Rising funding recipients; and
- a. LBC all staff conference.

6.12.6 Information about the consultation and how to respond was also shared at in-person events at the following locations during the consultation period:

- a. Sri Ravidas Temple, Luton;
- b. Westbourne Rd Mosque, Luton;
- c. Al Hira Mosque, Beechwood Road, Luton;
- d. St. Patrick's Day events at Market Hill/Town Hall, Luton;
- e. Dallow Temple, Luton;
- f. Dallow Centre Prayer Groups, Luton;

- g. Bury Park Mosque, Luton;
- h. Young People's group at Westbourne Road Mosque, Luton;
- i. Lewsey Pentacostal Centre, Luton;
- j. Holy Ghost Church, Luton;
- k. Cromwell Hill Mosque, Luton;
- l. St. Mary's Church, Dunstable;
- m. Church of Sacred Heart, Marsh Farm;
- n. Sikh Temple, Luton;
- o. Bury Park Community Centre, Luton;
- p. Luton Rotary Club;
- q. Luton Irish Forum; and
- r. Luton BAME media day, Hart House, Luton.

### ***Youth campaign***

- 6.12.7 Part way through the consultation it was evident that there was a low response rate from young people. To address this a targeted youth campaign was launched. Adverts were run on Facebook, Instagram and Snapchat. The advert was viewed by 52,080 Facebook and Instagram accounts.
- 6.12.8 The advert included a link to a shorter Consultation Feedback Form which included the same demographic questions as the Consultation Response Form along with Question 5 which asked the extent to which you support or oppose the expansion of London Luton Airport and an open question asking for reasons for the response. Responses submitted via the shorter Consultation Feedback Form have been considered in the same way as all other feedback; in total there were 13 responses from under 24 year olds which used the shorter feedback form.
- 6.12.9 A link to the shorter consultation response form was also emailed to contacts at Barnfield college, the University of Bedfordshire and the Youth Network CIC.

## **6.13 Additional consultation with PILs commencing May 2022**

- 6.13.1 Given the changing nature of landownership, the process of identifying PILs was an on-going activity throughout the pre-application period. After the 2022 statutory consultation additional PILs were identified and an additional targeted statutory consultation was held with these PILs from 31 May to 19 July 2022 (seven weeks).
- 6.13.2 The additional PILs were identified in the following ways:
- a. 73 were identified because the letters sent at the start of the 2022 statutory consultation were 'returned to sender' by Royal Mail. In these cases alternative contact details for the PILs were used where available;
  - b. two were identified in LIQs received after the 2022 statutory consultation;

- c. one was identified as a precautionary measure because the leaseholder of a property informed the Applicant of a new registered address – therefore classifying this property as vacant – after the start of statutory consultation. A letter was sent to the property to ensure any new occupier was given notice of the consultation; and
- d. one was included because a PIL consulted during the 2022 statutory consultation informed the Applicant of a new address where they would prefer to be contacted.

- 6.13.3 Letters were sent to three Category 1 and 2 PILs, and 74 Category 3 PILs. A copy of both letters can be found in **Appendix K**. A copy of the Summary Brochure and Consultation Response Form was included with the letters. The Category 1 and 2 PILs were also sent a USB stick with a copy of all consultation materials.
- 6.13.4 The letters explained the reason for consultation and how they could respond. The project website remained live and contained a link to all consultation documents, Consultation Boards and videos. The virtual engagement room was not live during this targeted consultation however all materials were available on the website.
- 6.13.5 The feedback channels were similar to the 2022 statutory consultation. A stamped addressed envelope was included with the letters so that consultees could return completed Consultation Response Forms or letters free of charge. The online Consultation Response Form was not live during this targeted consultation, however completed hard copy forms could be posted or scanned and emailed to [2022consultation@lutonrising.org.uk](mailto:2022consultation@lutonrising.org.uk). Freeform letters or emails were also accepted as before. An answerphone was available for consultees to leave a question or request additional materials.
- 6.13.6 No additional responses were received as part of this additional consultation.

## 6.14 Analysis of feedback

- 6.14.1 In accordance with Section 49 of the Act, the duty to take account of responses, after the consultation had closed all feedback received was analysed. The approach for analysing feedback received in the 2022 statutory consultation was the same as that for the 2019 statutory consultation as described in **Section 4.14** with the following differences:
- a. no feedback was received via telephone in 2022 so this did not need to be transcribed into the master database; and
  - b. responses from Prescribed Consultees and local authorities were all copied into the 'due regard' tables verbatim rather than firstly being coded by the external company.
- 6.14.2 The 'due regard' tables for the 2022 statutory consultation can be found in **Appendix M**.

## 7 INFORMAL STAKEHOLDER ENGAGEMENT

### 7.1 Introduction

7.1.1 This section describes the informal engagement with stakeholders that the Applicant undertook in addition to formal consultation. Detail about the formal consultation can be found in **Section 4 and 6** of this report.

### 7.2 Purpose of informal stakeholder engagement

7.2.1 In addition to the non-statutory consultation held in 2018 and the statutory consultations held in 2019 and 2022, which took place to inform the proposals for the Proposed Development, the Applicant also held informal discussions with statutory consultees and other key stakeholders during the pre-application period.

7.2.2 This informal engagement allowed the Applicant to inform stakeholders' understanding of the Proposed Development and its potential impacts. This enabled them to put forward their views and concerns at any early stage, and on an ongoing basis, to influence the proposals.

### 7.3 Engagement with local authorities

7.3.1 Please see **Section 1.4** of this report for more information.

### 7.4 Engagement with Technical Working Groups

7.4.1 The Applicant has carried out engagement with the host authorities, and other relevant key stakeholders (including the Environment Agency, local Wildlife Trusts, Natural England, UK Health Security Agency, local Clinical Commissioning Groups, Local Enterprise Partnerships (South East Midlands, Buckinghamshire and Hertfordshire), and National Highways) regarding key technical matters through a range of Technical Working Groups (TWGs). The TWG meetings have taken place since prior to the 2019 statutory consultation, and have continued to be held up to submission of the application for development consent. The TWGs are as follows:

- a. Air Quality TWG;
- b. Biodiversity TWG;
- c. Climate Change and Greenhouse Gas TWG;
- d. Contaminated Land TWG;
- e. Economics and Employment TWG;
- f. Equality Impact Assessment TWG;
- g. Ground Conditions, Resources and Waste TWG;
- h. Health TWG;
- i. Landscape and Visual Impact Assessment TWG;
- j. Noise/NEDG TWG;

- k. Surface Access TWG;
- l. Water TWG.

### ***Air Quality TWG***

- 7.4.2 Within the Air Quality TWG meetings, discussions took place regarding updates to the Proposed Development, the GCG proposals, the feedback received to the statutory consultations, and the air quality assessment methodology and results.

### ***Biodiversity TWG***

- 7.4.3 The Biodiversity TWG meetings focused on updates to the Proposed Development and feedback received to the statutory consultations. There were also discussions regarding the biodiversity net gain calculations.

### ***Climate Change and Greenhouse Gas TWG***

- 7.4.4 Discussions took place during the Climate Change and Greenhouse Gas TWG meetings regarding changes to the Proposed Development, the feedback received to the statutory consultations, the GCG proposals, and the Net Zero Strategy (Ref 9). Preliminary results of the greenhouse gas and climate change resilience assessments within the 2022 PEIR were presented, followed by an update on changes to the assessment in a subsequent TWG, following the close of the 2022 statutory consultation.

### ***Contaminated Land TWG***

- 7.4.5 A range of topics were discussed during the Contaminated Land TWG meetings. This included discussions about changes to the Proposed Development and responses to the statutory consultations, and more targeted discussions regarding the following matters: zone of influence from the Proposed Development, assessment methodologies, existing baseline conditions, inclusion of off-site interventions, settlement in areas of deposited material, exposure of features of geological interest, perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) in soils and groundwater in the vicinity of the Fire Training Ground, risks posed by the former Eaton Green Landfill to groundwater, risks of piling the former landfill, proposed ground gas monitoring strategy, gas mitigation, foundation works risk assessment, reuse of landfill waste, management of materials, environmental permits, and groundwater monitoring.

### ***Economics and Employment TWG***

- 7.4.6 Discussions at the Economics and Employment TWG meetings were focused initially on the methodology for assessing the economic impact of the Proposed Development and the presentation of the assessment results of direct, indirect and induced impacts of growth of the airport. Later meetings focused on the **Employment and Training Strategy [TR020001/APP/7.05]** and gaining evidence from stakeholders on wider economic impacts related to the proposals. Discussions were also held regarding changes to the Proposed Development and the feedback received to the statutory consultations.

### ***Equality Impact Assessment TWG***

- 7.4.7 The main purpose of the Equality Impact Assessment TWG meetings were to discuss the **Equality Impact Assessment [TR020001/APP/7.11]** methodology, alongside discussing the baseline context for the proposals (in particular regarding any protected characteristic groups in the surrounding areas that may be significantly impacted by the Proposed Development). The meetings also provided the Applicant with an opportunity to understand whether there are any specific resources that the protected characteristic groups may use that it should be aware of, and to identify relevant local groups that should be engaged with.

### ***Ground Conditions, Resources and Waste TWG***

- 7.4.8 Within the Ground Conditions, Resources and Waste TWG meetings, discussions were held regarding changes to the Proposed Development and the feedback received to the statutory consultations. Discussions were also focused on the current and future baseline, changes to the assessment methodology, waste disposal facilities, cumulative assessments, and proposed mitigation.

### ***Health TWG***

- 7.4.9 During the Health TWG meetings, the general approach to the health and communities EIA scoping was discussed, in addition to discussions regarding changes to the Proposed Development and the feedback received to the statutory consultations. Discussions were also held covering the following topics: EIA methodology, study area and receptors, monitoring, Wigmore Valley Park, the quantification and monetisation of health effects, community engagement, unaccompanied minors, and Covid-19.

### ***Landscape and Visual Impact Assessment TWG***

- 7.4.10 A range of topics were discussed during the Landscape and Visual Impact Assessment TWG meetings, including changes to the Proposed Development, the rationale for the proposed earthworks and open space changes, and the proposals for the replacement open space and embedded mitigation. Discussions have also been held regarding the Airport Access Road and its associated landscape mitigation. Responses received to the statutory consultation were discussed, and changes to the approach and proposals agreed where necessary and appropriate.

### ***Noise/NEDG TWG***

- 7.4.11 During the Noise TWG meetings, discussions were held covering the following topics: baseline noise monitoring locations, receptors, air noise assessment methodology, health impacts, noise model validation, in-combination assessments, air space changes, noise management plans, operational noise monitoring proposals, the noise insulation scheme, noise contours and contour areas, and population exposure. Discussions were also held regarding the feedback received to the statutory consultation. Also discussed was headline passenger forecasts, model validation, GCG and the use of noise contours as

the basis for limits, passenger forecast and fleet mix modelling, and noise footprints. Discussions were also held regarding the suggested noise metrics against the controls for the Noise Envelope.

### ***Surface Access TWG***

- 7.4.12 Within the Surface Access TWG meetings, updates on the Proposed Development, key forecasting assumptions, and the GCG proposals were provided. Discussions were also held on the results of the traffic modelling for the 21.5 mppa in 2027 scenario. Measures to reduce private vehicle travel and encourage more travel via sustainable transport methods were discussed, alongside ideas for methods of monitoring travel to and from the airport. Surface access limits for GCG, and how performance targets will be monitored and reported were also discussed.

### ***Water TWG***

- 7.4.13 During the Water TWG meetings, agreement was sought on the principles of scoping and the scope of the EIA and flood risk assessment, and an outline of the potential flood risk issues was provided. Discussions were also held regarding the feedback received to the statutory consultations.

## **7.5 Engagement with prescribed consultees**

- 7.5.1 The Applicant has carried out engagement with the following prescribed consultees:
- a. Bedfordshire Fire and Rescue;
  - b. Chilterns Conservation Board;
  - c. Civil Aviation Authority (CAA);
  - d. Environment Agency;
  - e. Hertfordshire Fire and Rescue;
  - f. Historic England;
  - g. National Highways;
  - h. Natural England; and
  - i. UK Health Security Agency (UKHSA) and Office for Health Improvement and Disparities (OHID).

### ***Bedfordshire Fire and Rescue***

- 7.5.2 The Applicant engaged with the Bedfordshire Fire and Rescue service through 2019 and prior to the 2022 statutory consultation. Prior to the 2019 statutory consultation, Bedfordshire Fire and Rescue were involved in a meeting with other local emergency service providers to carry out a design review of measures relating to safety and security. Discussions were also held regarding the proposed earthworks and the process for assessing risk. The purpose of the engagement following the 2019 statutory consultation was to provide updates regarding the changes to the Proposed Development since the previous

statutory consultation and the project timeline. Discussions were held regarding EIA and the major accidents and disasters assessment, traffic modelling, junction improvements, and network performance. A meeting was also held prior to the 2022 statutory consultation to confirm that Bedfordshire Fire and Rescue was happy with the proposals with respect to the impact on its services.

### ***Chilterns Conservation Board***

- 7.5.3 The Applicant engaged with the Chilterns Conservation Board in 2019, prior to the statutory consultation, as part of the Landscape and Visual Impact Assessment and Biodiversity TWG with the Wildlife Trusts and a number of representatives from local authorities. The Chilterns Conservation Board also attended one of the briefing sessions held in early 2022, prior to the launch of the statutory consultation. Following the 2022 statutory consultation, the Applicant wrote to the Chilterns Conservation Board to address the comments raised in its consultation response.

### ***CAA***

- 7.5.4 The Applicant has engaged with the CAA regularly since 2019. The purposes of the meetings have been varied. A number of meetings were held to provide the CAA with updates about the Proposed Development and to discuss its response to the 2019 statutory consultation. Specific discussions were also held regarding aerodrome design, including presentation of the airfield capacity simulation modelling, and flight paths.
- 7.5.5 Later meetings have provided the CAA with updates on the latest airfield layouts and have provided the opportunity to discuss the interface between the wider FASI-S Airspace Modernisation programme and the Proposed Development and how these could be most clearly communicated to the Planning Inspectorate within the application documentation.
- 7.5.6 Following the 2022 statutory consultation, the Applicant met with the CAA a number of times to discuss and resolve the points raised in its consultation response.

### ***Environment Agency***

- 7.5.7 The Applicant has carried out engagement with the Environment Agency throughout the pre-application period from 2018. This has included both individual meetings with the Environment Agency, and TWG meetings. Within the TWG meetings, discussions have covered the drainage strategy for the Proposed Development, land contamination issues, the EIA, the results of the waste and resources assessment, the waste infrastructure baseline, the proposed ground gas monitoring strategy and proposed groundwater and leachate monitoring strategy, and perfluoroalkyl and polyfluoroalkyl substances (PFAS) and PFOA related issues.
- 7.5.8 The individual meetings with the Environment Agency have included discussions related to the ground investigation strategy, Water Framework Directive assessment and compliance, the drainage strategy, the approach to surface water management, the strategy for dealing with the landfill material



during earthworks, the options for environmental permitting, earthworks and foundation options in relation to contamination, the approach to detailed modelling of the groundwater assessment, and the hydrogeological risk assessment process.

### ***Hertfordshire Fire and Rescue***

- 7.5.9 The Applicant engaged with Hertfordshire Fire and Rescue service both prior to and following the 2019 statutory consultation period. As part of this, an overview of the major accidents and disasters assessment was provided. Hertfordshire Fire and Rescue also attended the Hertfordshire Local Resilience Forum meeting in 2021, where the 2022 statutory consultation was explained.

### ***Historic England***

- 7.5.10 Engagement with Historic England took place prior to both statutory consultations in 2019 and 2022. The purpose of this engagement was to provide Historic England with an introduction to the proposals and the programme, and to discuss the Heritage EIA scoping. An overview of the proposed methodology of the assessment, and initial views on potential impacts of the Proposed Development on cultural heritage was also provided.
- 7.5.11 In early 2020, Historic England provided a pre-application advice letter, which requested that Luton Hoo Registered Park and Gardens was assessed in its entirety and that further description of the settings of Luton Hoo and Someries Castle are included in the desk-based cultural heritage assessment, this advice was taken on board.
- 7.5.12 Discussions have also been held with Historic England via email following the close of the 2022 statutory consultation, which covered the agreement of heritage asset viewpoint locations and discussions regarding possible impacts on Grade II listed buildings and monuments.

### ***National Highways***

- 7.5.13 The Applicant has engaged regularly with National Highways throughout the pre-application period since 2018. Prior to the 2019 statutory consultation, discussions were held with National Highways regarding the approach to surface access within the proposals and to provide an overview of the Proposed Development. During 2021, prior to the 2022 statutory consultation, discussions with National Highways covered a number of topics including, updates on the revised key forecasting assumptions and the programme in general, results of the 21.5 mppa for 2027 design scenario, and promoting sustainable travel at the airport.
- 7.5.14 Following the statutory consultation in 2022, meetings were held with National Highways to discuss the points raised in its response to the statutory consultation, and to provide an update on the GCG proposals, and the sensitivity testing undertaken as part of the **Transport Assessment [TR020001/APP/7.02]**. Meetings were also held to discuss the content of an SoCG between both parties.

### ***Natural England***

- 7.5.15 The Applicant has engaged with Natural England as part of the Biodiversity TWG. This included discussions regarding the proposals and the application timeline. Within these meetings there have also been reviews undertaken of stakeholder feedback following the statutory consultations, and the Applicant set out how it proposed to address the comments raised and agree changes to the approach where necessary. Details about the biodiversity net gain calculations were also provided.

### ***UKHSA and OHID***

- 7.5.16 Engagement with the UKHSA and OHID (formerly Public Health England<sup>7</sup>) took place in the pre-application period, from 2020 onwards. This included both individual meetings and attendance at the Health TWG. A range of topics were discussed including health and community, community liaison, air quality, major accidents and disasters (assessment, risk assessment, hazards and mitigation), and Wigmore Valley Park. Information was also provided regarding updates about the Proposed Development, methodology and approach, monitoring, and study area receptors.

## **7.6 Engagement with statutory undertakers**

- 7.6.1 The Applicant has carried out engagement with the following statutory undertakers:

- a. Affinity Water;
- b. Cadent Gas Limited;
- c. East of England Ambulance Service NHS Trust;
- d. NATS En Route Safeguarding (NATS);
- e. Prax;
- f. Royal Mail;
- g. Thames Water;
- h. UK Power Networks (UKPN).

### ***Affinity Water***

- 7.6.2 Engagement with Affinity Water took place both prior to and following the 2022 statutory consultation. Affinity Water were provided with an update on the proposals and design, and discussions were held regarding the water supply and discharge numbers and forecasts, and water quality related to the discharge from the water treatment plant.

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<sup>7</sup> Public Health England's health protection functions were formally transferred into the UK Health Security Agency, while its health improvement and healthcare public health functions were transferred to the Office for Health Improvement and Disparities.

### ***Cadent Gas Limited***

- 7.6.3 Engagement with Cadent took place following the close of the 2022 statutory consultation. During these meetings, the Applicant provided Cadent with an update about the Proposed Development and discussions were held regarding Cadent's statutory consultation response and the proposed works in proximity to its apparatus, including discussions regarding the medium pressure and low pressure apparatus and local high pressure gas main.

### ***East of England Ambulance Service NHS Trust***

- 7.6.4 The Applicant engaged with the East of England Ambulance Service NHS Trust as part of the Hertfordshire Local Resilience Forum in 2019 and 2021. Prior to the statutory consultation in 2019, discussions were held regarding the proposed earthworks and the process for assessing risk. During the meetings after the 2019 statutory consultation, an update on the Proposed Development and design changes and an overview of the EIA and major accidents and disasters assessment were provided. Following the 2022 statutory consultation, the Applicant wrote to the East of England Ambulance Service NHS Trust to address the comments raised in its consultation response.

### ***NATS***

- 7.6.5 Engagement with NATS has taken place since 2019. The purpose of this has been to provide updates about the Proposed Development. Specific discussions were also held regarding aerodrome design, including presentation of airfield capacity simulation modelling, flight paths, updates about the aviation forecasts, and information about the proposals for the airfield. As a result of these discussions, the proposals for a new surface movement radar were brought forward to the first stage of the project to ensure that NATS maintain visibility of the manoeuvring area at all stages of the development.
- 7.6.6 The meetings were also key to coordinating the approach to the broader airspace change process (separate to and not required as a result of the Proposed Development), in particular how to clearly explain to external parties the relationship between the processes and any potential implications to be considered in the assessment of impacts for the Proposed Development.
- 7.6.7 Following the 2022 statutory consultation, meetings were also held to discuss and resolve matters raised in NATS' statutory consultation response and capture these in an SoCG.

### ***Prax***

- 7.6.8 Engagement with Prax was carried out both prior to, and following, the 2022 statutory consultation. A key topic of engagement with Prax was the proposed new fuel storage facility and connection to the existing national fuel delivery pipeline, which is located around 500m from the proposed new facility. During these meetings, Prax provided an update on the pipeline, spur, delivery, and batch loads, and discussions were held regarding the fuel strategy and the preparation of the SoCG between the Applicant and Prax.

### ***Royal Mail***

- 7.6.9 The Applicant engaged with Royal Mail during a meeting in September 2021. The purpose of this meeting was to provide Royal Mail with information about the transport modelling and outline the rationale for a second statutory consultation in early 2022. An update regarding the Proposed Development and timeline for the application for development consent was also provided. Royal Mail explained the importance of M1 Junction 10 to its connectivity and operations, and the performance of the universal postal service functions, and raised concerns regarding delays to its network during the construction period. The concerns raised by Royal Mail have been taken into account within the Proposed Development.

### ***Thames Water***

- 7.6.10 The Applicant engaged with Thames Water throughout the pre-application stage from 2018, including after the close of the 2022 statutory consultation. Early meetings focused on the drainage strategy and the proposals for the Proposed Development. Discussions were held regarding water supply and discharge forecasts and Thames Water provided forecasts on the East Hyde Treatment Works capacity. Discussions were also held regarding additional site and apron allowance in calculations, and foul allowance in Thames Water's forecast.

### ***UKPN***

- 7.6.11 UKPN attended meetings with the Applicant both prior to the 2022 statutory consultation and after the consultation closed. Prior to the consultation, UKPN were provided with an update on the Proposed Development since the 2019 statutory consultation, including the changes to the proposals. Following the close of the 2022 consultation, the Applicant provided UKPN with updates regarding the energy demand profile, energy strategy and Jet Zero, Ofgem publications, capacity and demand, and the potential load phasing and timing.

## **7.7 Engagement with political stakeholders**

- 7.7.1 The Applicant has engaged with a number of key political stakeholders outside of the formal consultation process. This included a number of local MPs: Richard Fuller MP (North East Bedfordshire), Bim Afolami MP (Hitchin and Harpenden), Andrew Selous MP (South West Bedfordshire), Daisy Cooper MP (St Albans), Sarah Owen MP (Luton North), Rachel Hopkins MP (Luton South), Leaders, Chief Executives and Councillors from the host and neighbouring authorities, and Parish Councillors.

### ***Members of Parliament***

- 7.7.2 Individual briefings were offered to each MP listed in **Section 7.7.1** prior to the 2022 statutory consultation. The purpose of these briefings was to provide the MPs with a preview of the developments in the proposals, and to provide them with an opportunity to discuss any other issues they had regarding the Proposed Development.

### ***Host and neighbouring local authority Councillors***

- 7.7.3 Briefing sessions for Councillors within the host and neighbouring authorities were held ahead of the 2019 and 2022 statutory consultations. The aim of the briefings was to provide Councillors with an overview of the Proposed Development and upcoming statutory consultation. This included information about the updated proposals, surface access, environmental management and GCG, localised benefits of airport expansion, and Community First.

### ***Luton Labour, Liberal Democrat and Conservative Groups***

- 7.7.4 Prior to each of the consultations, a briefing session was offered to each of the Policy Groups for the Luton Labour, Liberal Democrat and Conservative parties.
- 7.7.5 A separate briefing session was held for the Luton Labour Policy Group and Luton Liberal Democrat Policy Group prior to each of the consultations, from 2018 onwards. The sessions provided an update on the proposals and any changes since the previous consultation. The Luton Conservative Policy Group did not request a briefing.

### ***London Luton Airport Regional Forum***

- 7.7.6 The London Luton Airport Regional Forum was set up in September 2018 and meetings have been held periodically since. The forum is made up of Chief Executives and Leaders from all host authorities and several neighbouring authorities as follows:

- a. Central Bedfordshire Council;
- b. Hertfordshire County Council;
- c. LBC;
- d. North Hertfordshire District Council;
- e. Bedford Borough Council;
- f. Buckinghamshire Council;
- g. Dacorum Borough Council;
- h. East Hertfordshire District Council;
- i. Milton Keynes Council;
- j. St Albans City & District Council;
- k. Stevenage Borough Council; and
- l. Welwyn Hatfield Borough Council.

- 7.7.7 These forums were hosted by the Leader of LBC and provided a perspective on the emerging proposals from the local authority as shareholder of the Applicant. Topics discussed before both statutory consultations included economic and employment growth, environmental impacts, compensation proposals, surface access including east-west connections, skills development, and the extent to which wider benefits, including financial funding for community and voluntary organisations, flow into and are made available for neighbouring communities.

The forum has received high-level updates across the developing proposals, and including matters relating to Community First.

### ***Parish Councillors***

- 7.7.8 A briefing session and event was held for Parish Councillors prior to the 2019 statutory consultation, to ensure they had sufficient information about the proposals and the consultation process.
- 7.7.9 Two briefing sessions were held across January and February in 2022 prior to the statutory consultation. The purpose of these sessions was to provide local Parish Councillors with an overview of the Proposed Development and upcoming statutory consultation. This included information about the updated proposals, surface access, environmental management and GCG, localised benefits of airport expansion, and Community First.

## **7.8 Engagement with other key stakeholders**

- 7.8.1 The Applicant has carried out engagement with the following other key stakeholders:
- a. airlines (DHL, easyJet, Ryanair, TUI, Wizz Air);
  - b. Bedfordshire Local Resilience Forum;
  - c. Bedfordshire Police;
  - d. Hertfordshire Local Resilience Forum;
  - e. Herts and Middlesex Wildlife Trust;
  - f. LLAOL;
  - g. Shell and World Fuel Services (WFS); and
  - h. Wildlife Trust for Beds, Cambs and Northants.

### ***Airlines***

#### **Airline Consultation Group**

- 7.8.2 This group met eight times between September 2018 to August 2019 and all airlines operating at the airport were invited, including the operators of the business aviation facilities.
- 7.8.3 Discussions initially focused on the forecasts of future passenger demand and airline expectations for growth. Key operational requirements of the airlines were discussed and presentations made on the emerging layout and design options to meet those requirements.
- 7.8.4 Following the statutory consultation in 2019, a briefing meeting was held with the airlines to update them on changes to the scheme following consultation and in the light of the Covid-19 pandemic. A further briefing was held in summer 2021 to provide a further update on the scheme and to introduce the GCG proposals.
- 7.8.5 Specific engagement with individual airlines is set out below.

## **DHL**

- 7.8.6 Engagement with DHL has been ongoing since 2018. During this engagement, DHL raised a number of comments, indicating that it felt growth of dedicated freight should be factored into the application for development consent, and queried whether slots would be removed from carriers as a result of the binding noise contours developed through GCG. DHL also highlighted that its main priority was to protect its existing operation at the airport, and that it is developing its own sustainability strategy.

## **easyJet**

- 7.8.7 Engagement with easyJet has been ongoing since 2018, taking place both ahead of and following the 2019 and 2022 statutory consultations. The purpose of this engagement was to understand easyJet's requirements for the development at the airport and to discuss the emerging proposals. This included discussions about GCG, the Luton DART, the airline's operational requirements relating to the airfield layout, demand forecasts and timescales for growth, and the likely financial implications and environmental outputs. Specific discussions were also held regarding the impact of the Airport Access Road on access to land owned by easyJet.

## **Ryanair**

- 7.8.8 The Applicant also engaged with Ryanair prior to the both the 2019 and 2022 statutory consultations. In 2022, the purpose of this engagement was to provide Ryanair with an update on the project and changes to the Proposed Development since the 2019 statutory consultation. The meetings also included discussions about GCG, the Luton DART, the airline's operational requirements relating to the airfield layout, demand forecasts and timescales for growth, and the likely financial Implications and environmental outputs.

## **TUI**

- 7.8.9 The Applicant has engaged with TUI since 2018, and both ahead of and following the 2019 and 2022 statutory consultations, to provide updates about the proposals and consultation. Specific discussions were also held to discuss TUI's concerns around car parking capacity for its staff.

## **Wizz Air**

- 7.8.10 The Applicant has engaged with Wizz Air since 2018. Meetings were held to allow Wizz Air to provide feedback on the proposals. Updates were also provided about GCG, which included details of the thresholds and limits relating to noise, air quality, carbon, and surface access.

## ***Bedfordshire Local Resilience Forum***

- 7.8.11 The Applicant has engaged with the Bedfordshire Local Resilience Forum through 2019 and prior to the 2022 statutory consultation. The forum is made up of representatives from the emergency services, local authorities, NHS services and other agencies which are required to respond to any major emergency in the Bedfordshire and Luton area.

- 7.8.12 The purpose of this engagement was to provide an overview of the Proposed Development and project timeline, discuss the assumptions on future highway use, and introduce the approach to the assessment of major accidents and disasters.

### ***Bedfordshire Police***

- 7.8.13 The Applicant has engaged with Bedfordshire Police since 2019. Prior to the 2019 statutory consultation, Bedfordshire Police were involved in a meeting with other local emergency service providers to carry out a design review of measures relating to safety and security. Discussions were also held regarding the proposed earthworks and the process for assessing risk. Following the 2019 statutory consultation, a meeting was held with Bedfordshire Police to discuss the points raised in its statutory consultation response.
- 7.8.14 In 2021, the Applicant provided Bedfordshire Police with an update regarding the Proposed Development and design changes since the 2019 statutory consultation. Discussions were also held regarding the major accidents and disasters assessment methodology and preliminary assessment results, the terminal layout, the plans for the proposed police facilities, and the purpose and need for an SoCG between the Applicant and Bedfordshire Police.
- 7.8.15 In 2022, the Applicant met with Bedfordshire Police to progress the discussions regarding the terminal layout and the production of a draft SoCG.

### ***Hertfordshire Local Resilience Forum***

- 7.8.16 The Applicant engaged with the Hertfordshire Local Resilience Forum prior to the statutory consultations in both 2019 and 2022. The forum is made up from representatives in the emergency services (including Hertfordshire Police), local authorities, NHS services, and other agencies which are required to respond to any major emergency in Hertfordshire.
- 7.8.17 The purpose of this engagement was to introduce the Proposed Development, communicate updates to the Proposed Development following the 2019 statutory consultation, and discuss the approach to the assessment of major accidents and disasters.

### ***Herts and Middlesex Wildlife Trust***

- 7.8.18 Herts and Middlesex Wildlife Trust were engaged through the Biodiversity TWG. The Wildlife Trust attended three of these meetings prior to the 2019 statutory consultation, and also attended a meeting in 2020 and following the close of the 2022 consultation. The meetings held prior to the 2019 statutory consultation included an overview of how the design evolved and a summary of the non-statutory consultation outcomes, and discussions regarding the bird strike risk assessment, landscape and ecology assessment work and the Planning Inspectorate response to the **EIA Scoping Opinion and Scoping Report [TR020001/APP/5.05]**.
- 7.8.19 The meeting held in 2020 covered discussions about land ownership of the wider hedgerow network, habitat creation, biodiversity net gain, mitigation measures, and surveys.



- 7.8.20 During the meeting in 2022, an update was provided on the Proposed Development and the comments provided by relevant stakeholders to the consultation were reviewed. The Applicant also set out how it proposed to address the comments raised and agree changes to the approach where necessary. An overview of the biodiversity net gain calculations was also provided.

### ***LLAOL***

- 7.8.21 The Applicant has engaged with LLAOL since the earliest stages of project development in 2018, and has continued to engage throughout the pre-application stage.
- 7.8.22 Regular collaboration meetings took place during 2021 and 2022 when both parties met at strategic and technical levels to discuss various aspects of the Proposed Development. A number of topics were discussed during these meetings, with the purpose of reaching a common understanding on key assumptions, including passenger forecasting, operational capacity, approach to road surface access, agreement on construction and discussion regarding costs, improvements to the design of the Proposed Development to reflect an improved passenger experience and better reflect operational need, approach to sustainability and the principles of GCG, noise impacts and improved compensation schemes, and socio-economic impacts and key information linked to jobs. LLAOL was closely involved in the technical review and due diligence for the design and all other aspects of the Proposed Development.

### ***Shell and World Fuel Services***

- 7.8.23 Engagement with Shell and World Fuel Services (WFS) collectively has taken place during 2021 and 2022. The meetings prior to the 2022 statutory consultation were focused on providing updates about the proposals and discussing and progressing the fuel strategy. Following the close of the consultation, meetings with Shell and WFS have been focused on the drafting of SoCGs, and discussions regarding sustainable aviation fuel production, tanker deliveries, hydrant supply to Terminal 1, and environmental, social and governance benefits.

### ***Wildlife Trust for Beds, Cambs and Northants***

- 7.8.24 The Wildlife Trust for Beds, Cambs and Northants has been engaged with the Applicant through the Biodiversity TWG. The Wildlife Trust attended three of these meetings prior to the 2019 statutory consultation, and also attended a meeting in 2020 and following the close of the 2022 consultation. The meetings held prior to the 2019 statutory consultation included an overview of how the design evolved and a summary of the non-statutory consultation outcomes, and discussions regarding the bird strike risk assessment, landscape and ecology assessment work and the Planning Inspectorate responses to the EIA Scoping Report as described in the **EIA Scoping Opinion and Scoping Report [TR020001/APP/5.05]**.

- 7.8.25 The meeting held in 2020 covered discussions about land ownership of the wider hedgerow network, habitat creation, biodiversity net gain, mitigation measures, and surveys.
- 7.8.26 During the meeting in 2022, an update on the proposals was provided, the comments provided by relevant stakeholders to the 2022 statutory consultation were also reviewed, and the Applicant set out how it proposed to address the comments raised and agree changes to the approach where necessary. An overview of the biodiversity net gain calculations was also provided.

## 8 OVERVIEW OF RESPONSES

### 8.1 2018 non-statutory consultation

8.1.1 In total, 892 responses were received to the 2018 non-statutory consultation (25 June 2018 to 31 August 2018). **Table 8.1** provides further information on the format of these responses.

Table 8.1: 2018 Non-statutory consultation response format

How response was received	Number
Online feedback form	499
Hard copy feedback form	340
Freeform response received via email or letter	53

8.1.2 No late responses were received after the consultation closed.

8.1.3 The majority of responses were received from individual members of the public. Responses were also received from local authorities, parish councils and other organisations. A full list of respondents can be found in the Non-Statutory Consultation Feedback Report in **Appendix A**.

### 8.2 2019 statutory consultation

8.2.1 In total 3,501 responses were received to the 2019 statutory consultation (16 October 2019 to 16 December 2019). **Table 8.2** provides further information on the format of responses.

Table 8.2: 2019 Statutory consultation response format

How response was received	Number
Online feedback form	1,363
Hard copy feedback form	479
Freeform response received via email	790
Freeform response received in hard copy	83
Postcards	781
Telephone	3
Petitions	2

8.2.2 The table above includes late responses received up to 31 December 2019 (14 days after the consultation closed). These responses have been considered in the same way as all other responses. Three responses were received after 31 December 2019 and were not considered (however all points raised in these late submissions had been raised by other respondents).

8.2.3 Of the two petitions received, one objected to the Proposed Development and contained 578 signatures. The other was supportive of the Proposed

Development and contained 1,943 signatures. The supportive and opposing responses comments raised in petitions have been treated in the same manner as responses received via other mediums.

8.2.4 Responses were received from Prescribed Consultees, local authorities, PILs, national, regional, and local organisations, businesses, and community consultees.

8.2.5 The following organisations categorised as local authorities responded to the consultation:

- a. Buckinghamshire County Council and Aylesbury Vale District Council (combined response);
- b. Central Bedfordshire Council;
- c. Chiltern District Council<sup>8</sup>;
- d. Dacorum Borough Council;
- e. Essex County Council;
- f. Greater Cambridge Planning;
- g. Harrow London Borough Council;
- h. Hertfordshire County Council;
- i. Host authorities (combined response from LBC, Hertfordshire County Council, North Hertfordshire District Council and Central Bedfordshire Council);
- j. Milton Keynes Council;
- k. North Hertfordshire District Council;
- l. St Albans City and District Council; and
- m. Stevenage Borough Council.

8.2.6 The following organisations categorised as Prescribed Consultees responded to the consultation:

- a. Affinity Water;
- b. Bedfordshire Police and Crime Commissioner;
- c. Cadent Gas;
- d. Chiltern Conservation Board;
- e. Civil Aviation Authority;
- f. England's Economic Heartland;
- g. Environment Agency;
- h. Health and Safety Executive;
- i. Hertfordshire Fire and Rescue;

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<sup>8</sup> Chiltern District Council became part of the Buckinghamshire Council unitary authority in 2020.

- j. Highways England;
- k. Historic England;
- l. Kings Walden Parish Council;
- m. NATS En Route Safeguarding;
- n. Natural England;
- o. Network Rail;
- p. Public Health England;
- q. Slip End Parish Council; and
- r. Thames Water.

8.2.7 Responses were received from 169 PILs. Comments to the 2019 statutory consultation from PILs, along with a response to them, are set out in **Appendix L**.

### 8.3 2022 statutory consultation

8.3.1 In total 3,790 responses were received during the 2022 statutory consultation (8 February 2022 to 4 April 2022). **Table 8.3** provides further information on the format of responses.

Table 8.3: 2022 Statutory consultation response format

How response was received	Number
Online consultation response form	2,114
Youth campaign online consultation response form	41
Hard copy consultation response form	56
Freeform response received via email	626
Freeform response received in hard copy	953

8.3.2 Eleven late responses were received after the close of consultation. These responses were received within one week of the close of consultation and are included in the table above. They have been considered in the same way as all other responses. Eight responses were received more than one week after the close of consultation and have not been considered (similarly to the 2019 statutory consultation, all points raised in these late submissions had been raised by other respondents).

8.3.3 The following organisations categorised as local authorities responded to the consultation:

- a. Bedford Borough Council;
- b. Buckinghamshire County Council;
- c. Central Bedfordshire Council;
- d. Dacorum Borough Council;

- e. East Hertfordshire District Council;
- f. Host authorities (combined response from LBC, Hertfordshire County Council, North Hertfordshire District Council and Central Bedfordshire Council);
- g. Hertfordshire County Council;
- h. Huntingdonshire District Council;
- i. London Borough of Barnet;
- j. LBC;
- k. Milton Keynes Council;
- l. North Hertfordshire District Council;
- m. St Albans City and District Council; and
- n. Stevenage Borough Council.

8.3.4 The following organisations categorised as Prescribed Consultees responded to the consultation:

- a. BT Group Plc;
- b. Cadent Gas Limited;
- c. Chilterns Conservation Board;
- d. Civil Aviation Authority;
- e. East of England Ambulance Service NHS Trust;
- f. GTC Pipelines Limited;
- g. Health and Safety Executive;
- h. Historic England;
- i. Kin's Walden Parish Council;
- j. National Grid Gas Plc;
- k. National Highways;
- l. NATS En-Route Safeguarding;
- m. Natural England;
- n. Network Rail Infrastructure Ltd;
- o. Royal Mail Group;
- p. Scotland Gas Networks Plc;
- q. Slip End Parish Council;
- r. Thames Water;
- s. The Environment Agency;
- t. Transport for London;
- u. United Kingdom Health Security Agency; and
- v. Welwyn Hatfield Parish Council.

8.3.5 Responses were received from 192 PILs. Comments to the 2022 statutory consultation from PILs, along with a response to them, are set out in **Appendix L**.

## **8.4 Additional consultation with PILs commencing May 2022**

8.4.1 No responses were received to the additional targeted consultation with PILs in May 2022.

## 9 QUANTITATIVE ANALYSIS OF CLOSED QUESTIONS

9.1.1 The 2018 non-statutory consultation, and 2019 and 2022 statutory consultations asked a mixture of open and closed questions. This section summarises the responses to the closed questions. Responses to the open questions for the 2019 and 2022 statutory consultations are provided in **Appendix K** and **Appendix L** respectively. A summary of responses to the 2018 non-statutory consultation can be found in **Appendix A**.

9.1.2 The responses to both open and closed questions informed changes to the Proposed Development, and these changes are described in the **Sections 10, 11 and 12**.

### 9.2 2018 non-statutory consultation

9.2.1 A summary of the responses to closed questions asked in 2018 is set out below. For more detailed analysis please refer to the Non-Statutory Consultation Feedback Report (February 2019) which was published shortly after the 2018 consultation. A copy of this report can be found in **Appendix A**.

#### *Currently affected by the airport*

9.2.2 Question 2b asked respondents: *Please tell us if you are currently affected by the operations of London Luton Airport*. In total, 680 respondents answered this question. 45 respondents stated that they are not impacted by the operations at the airport, with 635 respondents outlining that they are impacted by airport operations in some way.

#### *Benefits of expansion*

9.2.3 Question 3a asked: *To allow us to understand your priorities with regard to the potential benefits of the expansion proposal, how important are the following to you? Please rank the following in order from 1 to 7, where 1 is the least important and 7 is the most important to you.*

9.2.4 In total, 702 respondents answered this question. **Table 9.1** illustrates the average order of preference from all responses.

Table 9.1: Responses to 2018 Question 3b

Priority	Order of ranking (7 = most important, 1= least important)
Ability to attract new jobs and economic growth into the area	7
Ability to support growth of the UK economy	6
Locally convenient air travel to a greater range of destinations	5
Ability to maintain competitive charges for airlines and customers	4



Ability to support important charitable and voluntary organisation services through the LLAL Community Fund in areas impacted by airport operations	3
Ability to support key local services through Luton Council	2
Ability to contribute to meeting the increasing national demand for air travel	1

### ***Options to expand***

9.2.5 Question 4a asked: *Do you agree that our expansion strategy to make best use of the existing runway is more appropriate than pursuing an extended, realigned or second runway.*

9.2.6 In total, 748 respondents answered this question: 409 agreed, 158 disagreed and 181 did not know.

9.2.7 Question 4b asked: *We think that development to the north side of the runway is the most appropriate solution for making best use of the existing runway at London Luton Airport. Our proposal is therefore to focus on options to the north of the runway and to discontinue the southern option at this stage. Do you agree?*

9.2.8 In total, 743 respondents answered this question: 372 agreed, 153 disagreed and 218 did not know.

9.2.9 Question 4c asked: *If development is taken forward to the north side of the runway, we think a two-terminal solution is the most appropriate solution. Do you agree?*

9.2.10 In total, 732 respondents answered this question: 290 agreed, 181 disagreed and 261 did not know.

### ***Managing the impacts***

9.2.11 Question 5a asked: *We have identified the following key impacts which we consider to be particularly important in the context of expanding London Luton Airport. Please rank these in order from 1 to 10, where 1 is the least important and 10 is the most important to you.*

9.2.12 In total, 784 respondents answered this question. **Table 9.2** illustrates the average order of preference from all respondents.

Table 9.2: Responses to 2018 Question 5a

<b>Priority</b>	<b>Order of ranking (1 = least important, 10= most important)</b>
Noise	10
Flightpaths	9
Air quality	8

Climate change	7
Surface access	6
Landscape and visual	5
Biodiversity	4
Enabling works (e.g. earthworks and replacement public open space)	3
Heritage	2
Land ownership and acquisition	1

### 9.3 2019 statutory consultation

9.3.1 The 2019 statutory consultation feedback form included one closed question as follows: Q3. *Have you experienced any of the following impacts of LTN? (Please tick all that apply)*

- *Air pollution*
- *Traffic congestion caused by the airport*
- *Noise pollution during the day*
- *Noise pollution at night, i.e. between 11:00pm and 6:00am*
- *Light pollution*
- *Other*

9.3.2 In total 1,798 respondents answered this question. Their responses are set out in **Table 9.3**. Impacts recorded by respondents who ticked 'other' included fuel deposits, parking on local roads, climate change, overcrowded public transport and visual intrusion.

Table 9.33: Responses to 2019 Question 3

<b>Impact</b>	<b>Number of respondents who have experienced the impact</b>	<b>Percentage of respondents who responded to Q3</b>
Air pollution	856	47.6%
Traffic congestion caused by the airport	1,102	61.3%
Noise pollution during the day	1,343	74.7%
Noise pollution at night, i.e. between 11:00pm and 6:00am	1,078	60.0%
Light pollution	297	16.5%
Other	211	11.7%

## 9.4 2022 statutory consultation

9.4.1 The 2022 statutory consultation feedback form included one closed question as follows: Q5. *Which of the following best reflects the extent to which you support or oppose the expansion of London Luton Airport? Please select one option:*

- *Strongly support*
- *Slightly support*
- *Neutral*
- *Slightly oppose*
- *Strongly oppose*
- *Don't know*

9.4.2 In total 2,204 respondents answered this question. The split of responses is set out in **Table 9.4** below.

Table 9.44: Responses to 2022 Question 5

<b>View</b>	<b>Number of respondents</b>	<b>Percentage of respondents who responded to Q5</b>
Strongly support	301	13.7%
Slightly support	66	3.0%
Neutral	41	1.9%
Slightly oppose	72	3.3%
Strongly oppose	1,716	77.9%
Don't know	8	0.4%

## 10 SCHEME CHANGES IN RESPONSE TO 2018 NON-STATUTORY CONSULTATION

### 10.1 Introduction

- 10.1.1 The 2018 non-statutory consultation sought views on the emerging strategic masterplan options for making best use of the existing runway.
- 10.1.2 All of the responses received during the 2018 non-statutory consultation were carefully considered and were used to inform the selection of the preferred option and other aspects of the scheme.
- 10.1.3 The 2018 non-statutory consultation feedback form included closed and open questions, responses from both open and closed questions were used to inform changes to the Proposed Development.
- 10.1.4 More detailed analysis of the feedback and responses to them can be found in the Non-Statutory Consultation Feedback Report (February 2019) which can be found in **Appendix A**.

### 10.2 Key scheme changes

- 10.2.1 The following changes were made to the Proposed Development in response to feedback to the 2018 non-statutory consultation. These changes were all incorporated into the Proposed Development as presented at the 2019 statutory consultation.
- 10.2.2 Further information on the consideration of alternatives and key design changes following the 2018 consultations is included in **Chapter 3 Alternatives** of the **ES [TR020001/APP/5.01]**, submitted as part of the application for development consent. Additional information on the sift process and design evolution of the Proposed Development, can be found in the **Design and Access Statement [TR020001/APP/7.03]**.

#### *Scale of expansion*

- 10.2.3 The 2018 non-statutory consultation sought views on the airport expanding to make best use of its existing runway to accommodate 36 – 38 mppa in the period up to 2050.
- 10.2.4 The local community and other stakeholders raised concerns about the scale of expansion and its potential impacts, including noise, air quality and traffic.
- 10.2.5 In response to further technical work and these concerns, the Applicant reduced the proposed passenger numbers from 36 – 38 to 32 mppa.

#### *Preferred option*

- 10.2.6 A shortlist of four emerging strategic masterplan options were consulted on during the 2018 non-statutory consultation. Option 1a was presented as the emerging preferred option.

10.2.7 Responses to the 2018 non-statutory consultation indicated that Option 1a did have the backing of respondents when compared to the other options for expansion.

10.2.8 In response Option 1a was taken forward, subsequently becoming the Proposed Development for which this application seeks consent.

### **Noise**

10.2.9 Noise was identified as one of the main concerns of respondents to the 2018 non-statutory consultation.

10.2.10 As a result of further technical work and in response to these concerns the Applicant committed to the use of a Noise Envelope which is a framework of legally binding and enforceable limits and controls to manage air noise. The type and nature of the controls that will apply within the Noise Envelope would be influenced by the NEDG. The NEDG is independently chaired, and includes representatives from local authorities, the community and other stakeholders with the necessary technical expertise.

10.2.11 Substantially improved noise compensation proposals, compared to existing arrangements, were also proposed following the 2018 non-statutory consultation. This comprised a new tiered noise insulation scheme which offers a range of packages for homeowners, dependent on the noise effects at their properties. Details were consulted on as part of the 2019 statutory consultation.

### **Wigmore Valley Park**

10.2.12 Responses from the 2018 non-statutory consultation suggested that further consideration should be given to retaining more of Wigmore Valley Park.

10.2.13 As a result, the Applicant explored an option that entirely avoided the park. However, it was concluded that this would not be viable due to this option requiring substantial development in the Green Belt and compulsory acquisition of third party land. Further information on the sifting process can be found in the **Design and Access Statement [TR020001/APP/7.03]**.

10.2.14 Therefore, in response to the feedback, the proposals were amended to retain more of the existing Wigmore Valley Park and keep some of the area previously identified for development under the New Century Park proposals as open space.

10.2.15 Consultation responses also indicated that the protection and creation of natural habitats was the most important consideration in the design and implementation of the replacement open space. This was taken into consideration in developing the design for Wigmore Valley Park.

10.2.16 Consultation responses also demonstrated the importance that respondents placed on protecting open space. In response, the Applicant committed to increasing public open space by at least 10% and this is reflected in the Proposed Development in this application for development consent.

## ***FIRST***

- 10.2.17 Responses to the 2018 non-statutory consultation included that some respondents felt that the benefits of the airport were not spread as widely as they could be. This was particularly for those locations where respondents felt they suffered negative impacts from airport operation without feeling any direct benefit.
- 10.2.18 In response a new funding stream was proposed which would run in addition to, and alongside, the existing Community Funding Programme. At the time this was called FIRST (Future LuToN Impact Reduction Scheme for the Three Counties) which was since updated to Community First for the 2022 statutory consultation. As proposed, FIRST was intended to deliver funding to enable impact reduction schemes across the three counties of Bedfordshire, Buckinghamshire and Hertfordshire. The main objective of this proposed fund was to provide an equitable basis for the allocation of resources created by the growth of the airport between Luton and the surrounding local authorities in perpetuity. The three key themes which funding was proposed to be provided to address were environment, access and community. Further updates have since been made, which detail on Community First provided in **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]**, submitted with the application for development consent.

## ***Construction***

- 10.2.19 Responses were received from the 2018 non-statutory consultation on the earthworks required to construct the new terminal. Responses indicated that respondents preferred for the earth to be taken from close to where it is needed. This would mean changes to the local topography, but the feedback received was that this was preferable to the large number of vehicle movements that would be required to import up to 4,000,000m<sup>3</sup> of material by road.
- 10.2.20 In response, the earthworks scheme taken forward uses material from the site to form required earthworks so that this work can be carried out in an efficient way. Further information can be found in the **Construction Method Statement and Programme Report** in Appendix 4.1 of the **ES [TR020001/APP/5.02]**.

## ***Surface access***

- 10.2.21 Respondents to the 2018 non-statutory consultation raised concerns about the impact of vehicles travelling to and from the airport on the local road network.
- 10.2.22 In response, an aim for at least 45% of passenger journeys to and from the airport to be made by public transport and other sustainable travel methods was introduced. Reference should be had to the **Surface Access Strategy [TR020001/APP/7.12]** and the **Green Controlled Growth Explanatory Note [TR020001/APP/7.07]** for more information on the proposed mode share commitments. The proposed car parking numbers to support the Proposed Development have been calculated on the basis of the proposed mode share commitments.

## 11 SCHEME CHANGES IN RESPONSE TO 2019 STATUTORY CONSULTATION

### 11.1 Introduction

- 11.1.1 The 2019 statutory consultation sought views on the preferred scheme which had been selected following the 2018 non-statutory consultation.
- 11.1.2 All of the responses received during the 2019 statutory consultation were carefully considered. The Proposed Development was updated having regard as far as possible or practicable to the feedback received.
- 11.1.3 The 2019 statutory consultation feedback form included closed and open questions, with the responses from these used to inform changes to the Proposed Development.
- 11.1.4 An analysis of the responses to closed questions is provided in **Section 9**. All of the feedback received and the Applicant's responses to the open questions is included in the 'due regard' tables in **Appendix K**. These tables were included in the 2019 Statutory Consultation Feedback Report which was published as part of the 2022 statutory consultation.

### 11.2 Key scheme changes

- 11.2.1 The following changes were made to the Proposed Development in response to feedback from the 2019 statutory consultation. These changes were all incorporated into the Proposed Development as presented at the 2022 statutory consultation.

#### *Managing the impact on local communities*

- 11.2.2 Responses to the 2019 statutory consultation expressed concern about the impact the Proposed Development could have on local communities including more noise and traffic, and poorer air quality. Responses asked the Applicant to be more ambitious in the approach to reducing this.
- 11.2.3 In response a new approach to managing the potential effects of the Proposed Development called GCG was developed. This is one of the most far-reaching commitments to minimising environmental impact ever put forward by a UK airport and seeks to manage the growth and operation of the airport through the coming decades within definitive environmental limits. Further details on the GCG can be found in the **Green Controlled Growth Explanatory Note [TR020001/APP/7.07]**, submitted with the application for development consent.

#### *Community First*

- 11.2.4 The 2019 statutory consultation included information on the Future LuToN Impact Reduction Scheme (FIRST). After the consultation it was recognised that the scheme could be put to more direct beneficial use, in line with the Applicant's social and environmental ethos, by targeting areas of high deprivation in the region and by helping to finance local decarbonisation projects. As well as fitting better with the Applicant's own values, this approach

is better aligned with the national levelling up and decarbonisation agendas promoted by the Government. To better reflect this revised approach the fund was renamed 'Community First'.

### ***Sustainability***

- 11.2.5 Responses expressed a desire to make the design as a sustainable as possible.
- 11.2.6 In response, additional sustainability measures were incorporated into the new terminal. These include renewable energy such as solar and geothermal, as well as rainwater harvesting. A commitment was also made to designing the terminal to BREEAM Excellent principles in terms of its environmental performance.
- 11.2.7 Responses to the 2019 statutory consultation also asked that the existing terminal be made more sustainable.
- 11.2.8 In response, additional measures were incorporated into the Proposed Development. These include the introduction of solar panels to generate electricity, electrical charging for aircraft whilst parked, as well as adding new water storage which will allow collected water to be recycled. Additional solar energy production was added on the car park, including battery storage and distribution.

### ***Surface access***

- 11.2.9 Responses to the 2019 statutory consultation considered that too much car parking was being provided and this would encourage car travel to the airport.
- 11.2.10 In response, the plans for car parking were reconsidered so that parking provision will be developed at the same rate as airport capacity is developed.
- 11.2.11 Information about Century Park Access Road was included in the 2019 statutory consultation material, however it was not part of the Proposed Development at that time.
- 11.2.12 After the 2019 statutory consultation, in response to the economic uncertainty caused by Covid-19, this road was slightly modified and incorporated into the Proposed Development. Incorporating the road as part of the Proposed Development would mean that the road is ready to use ahead of when it would be needed to provide access to the expanded airport. It was also renamed as the Airport Access Road. This change to the Proposed Development was made after the 2019 statutory consultation but not directly in response to comments received during that consultation.

### ***Wigmore Valley Park***

- 11.2.13 Consultation responses expressed that Wigmore Valley Park is an important local open space which respondents want to see protected and improved.
- 11.2.14 In response, as part of the proposals for the new area of open space the design was updated to keep more trees, maintain biodiversity, and retain an existing



ridgeline which will provide visual screening. The updated design also protects the British Romano structure in the expanded Park.

### ***Construction***

11.2.15 Many respondents were concerned about the potential disruption which could be caused during construction.

11.2.16 In response the design was amended to reduce the size of the airfield platform and landside remediation works, which will significantly reduce the amount of earth which needs to be moved. This will reduce the construction works on site and mean there are less construction vehicles on the surrounding roads.

### ***Other changes to the design***

11.2.17 Some responses to the 2019 statutory consultation provided detailed comments on, or suggestions for, the layout of the Proposed Development. In response, the following changes were made:

- a. reconfiguration of taxiways;
- b. realigning the position of the new stands to reduce the number within the landfill boundary;
- c. reducing the size of hardstanding associated with the Engine Run Up Bay;
- d. moving the fuel storage facility further away from the runway; and
- e. a new access road to the Fire Training Ground.

## 12 SCHEME CHANGES IN RESPONSE TO 2022 STATUTORY CONSULTATION

### 12.1 Introduction

- 12.1.1 The 2022 statutory consultation sought views on the Proposed Development as updated to reflect the 2019 feedback and wider context changes.
- 12.1.2 All of the responses received during the 2022 statutory consultation were carefully considered. The Proposed Development was updated having regard as far as possible or practicable to the feedback received.
- 12.1.3 The 2022 statutory consultation feedback form included one closed and several open questions, responses from both open and closed questions were used to inform changes to the Proposed Development.
- 12.1.4 Analysis of the closed question responses is provided in **Section 9**. All of the feedback received and the responses to the open questions is included in the 'due regard' tables in **Appendix L**.

### 12.2 Key scheme changes

- 12.2.1 The following changes were made to the Proposed Development in response to feedback from the 2022 statutory consultation. These changes are all incorporated into the Proposed Development as described in this application for development consent.

#### ***Additional assessment of impacts***

- 12.2.2 Consultation responses suggested that some additional assessments should be undertaken in order to better understand the potential impacts of the Proposed Development.
- 12.2.3 In response the following additional assessments and/or tests have been undertaken and included as part of the application for development consent:
- a. Additional sensitivity testing has been undertaken to ensure that the assessment of the impacts of the Proposed Development takes account of different scenarios and overall represents a reasonable worst case. The assessments in the **ES [TR020001/APP/5.01]** are based on a core set of assumptions regarding airport capacity and forecast passenger demand that are considered reasonable projections. There are certain known scenarios or risks that may occur that could influence the conclusions of the core assessment. To understand the likely environmental effects of these scenarios or risks occurring and to ensure that they have been considered appropriately in the assessment upon which consent is to be granted, sensitivity tests have been undertaken and are reported in the **ES [TR020001/APP/5.01]**. Further information on the approach to sensitivity testing is set out in **Chapter 5 Approach to Assessment** of the **ES [TR020001/APP/5.01]**. The sensitivity tests considered include:
    - i. **19 mppa application**— This sensitivity test considered that there is a possibility that the current airport operator's (LLAOL) planning

- application to increase the capacity of the airport to 19 mppa is granted by the Secretary of State, and that permission is granted during the determination of the application for development consent for the Proposed Development. This would have the effect of lifting the baseline capacity assumed from 18 to 19 mppa in the impact assessments included within the **ES [TR020001/APP/5.01]**.
- ii. **Faster and slower growth** – These sensitivity tests considered the possibility of passenger demand rising quicker or slower than forecast in the core planning case and that higher passenger throughput occurs earlier or later than predicted.
  - iii. **Next generation aircraft** – This sensitivity test considered an alternative long term fleet mix that takes into account the next generation of aircraft (rather than existing new generation, such as the Max and Neo), which may have better environmental performance.
  - iv. **Junction 10 of the M1 without National Highways Smart Motorway upgrade (hard shoulder running scheme)**— This sensitivity test assumes that all lane running is not delivered and the M1 continues to operate as it does today.
  - v. **Changes to airspace** – This sensitivity test considered the possible impact of future changes to flightpaths as a consequence of the FASl-S airspace modernisation in the south-east of England, and the effect this may have on the size of the noise contours.
  - vi. **Noise assessment baseline** – Respondents raised concern about the use of 2019 as a baseline, noting that existing noise contour limits were exceeded for both day and night periods in 2019. With reference to The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (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 2022 statutory consultation feedback, a sensitivity test was undertaken using a ‘2019 cap’ baseline, using a theoretical 2019 fleet that would have been compliant with the current consented short-term noise limit.
- b. An additional traffic modelling sensitivity test was undertaken at the request of host authorities and their appointed consultant. This looked to incorporate the growth in traffic demand from the strategic model into the local VISSIM model. The results are included in the **Transport Assessment [TR020001/APP/7.02]**. The findings of this sensitivity test have shown that the mitigation proposals as set out for the core scenario continue to mitigate the impacts of the Proposed Development on the highway network.
- c. An assessment of tranquillity on human and heritage receptors has been undertaken. The assessment is presented in **Chapter 16 Noise and Vibration** of the **ES [TR020001/APP/5.01]** 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**.

- d. The Landscape and Visual Impact Assessment (LVIA) has been revised using updated baseline photography for viewpoints which have experienced change since baseline data was collected in 2018/19. The updated assessment can be found in the LVIA in **Appendices 14.4 and 14.5** of the **ES [TR020001/APP/5.02]**. The assessment concluded that there had not been any changes to the landscape or visual impact of the Proposed Development to that presented at the 2022 statutory consultation.

### ***Terminal 1 design***

- 12.2.4 Responses to the 2022 statutory consultation requested an improved level of service at Terminal 1 and for existing facilities to be used most efficiently.
- 12.2.5 In response the design of Terminal 1 was changed to include two extensions: the first was an extension and reconfiguration of the internal baggage hall at mezzanine level; the second was an extension to the first floor to the north to increase the space dedicated to the departure lounge. These changes will ensure sufficient baggage handling and departure lounge capacity. The location is shown on **Scheme Layout Plans [TR020001/APP/4.02]**.
- 12.2.6 Additionally a new pier was added from the existing Pier B in Terminal 1, reducing the need for bussing of passengers. This will serve departing passengers from the Temporary Drop Off Zone (TDOZ) stands. The location is shown on **Scheme Layout Plans [TR020001/APP/4.02]**.

### ***Surface Access***

- 12.2.7 Responses to the 2022 statutory consultation suggested that the passenger and staff mode share Targets should be more ambitious than the Applicant presented as the indicative Limits for surface access in the Draft Green Controlled Growth Proposals document presented at the 2022 statutory consultation. In response, the Applicant has set out a process for identifying more ambitious Targets in the **Framework Travel Plan (FTP) [TR020001/APP/7.13]**, including additional Targets focused on specific modes and user experience.
- 12.2.8 A number of consultation responses stated that there needed to be greater certainty and transparency as to how environmental effects, including surface access, would be measured and reported. To address this, the Applicant has developed a Surface Access Monitoring Plan as part of the **GCG Framework [TR020001/APP/7.08]**, specifically for the monitoring of the GCG surface access Limits, with additional monitoring requirements set out by the **FTP [TR020001/APP/7.13]**, and Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) included as part of the **Transport Assessment [TR020001/APP/7.02]**.

- 12.2.9 The Applicant received feedback that GCG should be used to drive more ambition around reducing greenhouse gas (GHG) emissions from surface access. In response, the Applicant has aligned the Applicant's surface access GHG Limit with the commitment the Applicant made through the Luton Rising Net Zero Strategy (Ref 10) to be carbon neutral for surface access by 2040.
- 12.2.10 There were mixed views on the option to introduce road user charging consulted on during the 2022 statutory consultation, with some respondents supportive and others opposed.
- 12.2.11 The Applicant further considered the approach to road user charging and determined not to seek additional powers because the airport operator already has sufficient powers to charge for car parking and access to the airport.

### ***Infrastructure delivery and timing***

- 12.2.12 The response to consultation from UKPN stated that electricity demand is increasing in Luton area generally due to other developments. Feedback also suggested that energy demand could increase more quickly than anticipated due to an increase in electric vehicles.
- 12.2.13 In response a new 33kV substation is proposed to cater for an early increase in electric demand, ahead of and to supplement the second 33kV substation proposed to support Terminal 2. This will substitute the current 11kV main intake substation to the airport known as 'Substation 20'. This new substation would be located in the north western corner of the P9 carpark as shown on the **Scheme Layout Plans [TR020001/APP/4.02]**. This additional substation will ensure that the airport's electricity demands are met, and enables renewable energy that is generated elsewhere to be used on the site via private wire. The amount of renewable energy that can be generated onsite was also maximised/optimised.
- 12.2.14 The response from NATS suggested that some early works are in an area in which the Surface Movement Radar (SMR) coverage may be shielded based on current known coverage.
- 12.2.15 In response the SMR will be delivered at an earlier stage of construction in the same location and to the same design. Including the SMR in earlier mitigates visibility concerns of the TDOZ stands and proposed stands to the east of Taxiway Foxtrot.

### ***Compensation***

- 12.2.16 Responses questioned why the Noise Insulation Schemes did not include night-time noise exposure contours.
- 12.2.17 In response the Applicant has updated the approach to noise compensation to include a Noise Insulation Scheme for those properties within the night-time Significant Observed Adverse Effect Level (SOAEL) contour.
- 12.2.18 Responses queried what buildings were classified as a 'public building' by the Applicant, with regards to mitigation offered for night-time noise. In response,

the Applicant amended the wording within the **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]**, to clarify this.

- 12.2.19 Responses requested clarity regarding what qualifies as ‘unable to sell’, as well as length of marketing and reasonable asking price for properties. In response, the Applicant has clarified the Property Hardship Policy within the **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]**.

***Additional engagement***

- 12.2.20 Responses from stakeholders and members of the public requested that they continue to be engaged as the Proposed Development progresses.
- 12.2.21 There were particular requests from PILs for further engagement in respect of specific impacts on their properties and compensation.
- 12.2.22 All PILs requesting additional engagement have been contacted and further meetings held as necessary, engagement will continue after the submission of the application for development consent.
- 12.2.23 Many of the Prescribed Consultees, including the Environment Agency, CAA, NATS and utility providers as well as host and neighbouring authorities and parish councils, expressed a desire to continue to be engaged up to submission of the application for development consent and beyond.
- 12.2.24 The level of engagement with key Prescribed Consultees and other stakeholders increased after the 2022 statutory consultation and stakeholders were actively engaged. Details of this engagement is described in more detail in **Section 7** of this report.
- 12.2.25 Members of the public expressed particular interest in being involved in: the future design and management of Wigmore Valley Park; the development and implementation of the **Employment and Training Strategy [TR020001/APP/7.05]**; and the development and implementation of Community First.
- 12.2.26 In response, the Applicant is committed to further engagement with key stakeholders which has been continuing during ongoing development of the Employment and Training Strategy.

## 13 CONCLUSION

- 13.1.1 This report outlines the consultation undertaken by the Applicant prior to the submission of the application for development consent. The Applicant has consulted widely, over several years, about the Proposed Development. This has comprised both statutory consultation and on-going informal engagement.
- 13.1.2 The pre-application consultation process comprised the following main stages:
- a. non-statutory consultation (25 June 2018 to 31 August 2018);
  - b. 2019 statutory consultation (16 October 2019 to 16 December 2019);
  - c. 2022 statutory consultation (8 February 2022 to 4 April 2022); and
  - d. additional targeted PILs statutory consultation (31 May 2022 to 19 July 2022) (no responses were received).
- 13.1.3 Consultation on the Proposed Development has been undertaken in accordance with the requirements of the Planning Act 2008 (Ref 1). This report describes how those requirements have been met. The Section 55 Checklist [TR020001/APP/1.01] which is submitted as part of this application for development consent, provides a checklist of how all application requirements, including those related to consultation, have been complied with.
- 13.1.4 In accordance with Section 46 of the Act, the Applicant notified the Secretary of State of its intent to commence consultation pursuant to Section 42 of the Act (a copy of this letter can be found in **Appendix C5**). In addition, subject to regulations 8(1)(b) and 10(1) of the EIA Regulations 2017, the applicant wrote to the Secretary of State to notify its intent to provide an environmental statement in respect of the Proposed Development (a copy of this letter is provided in **Appendix C7**).
- 13.1.5 In accordance with Section 47 of the Act and statutory guidance '*Planning Act 2008: Guidance on the pre-application process*' (March 2015) (Ref 3), the Applicant prepared, consulted on and carried out engagement in accordance with a SoCC in the 2019 and 2022 statutory consultations. Further details on the preparation, consultation on and compliance with the 2019 SoCC can be found in **Section 3** and **Appendix B**, equivalent information for the 2022 SoCC can be found in **Section 5** and **Appendix G**.
- 13.1.6 The Applicant publicised the consultations in accordance with Section 48 of the Act and Regulations 5, 6 and 7 of the APFP Regulations 2009 (Ref 4). The consultation periods were 62 days in 2019 and 56 days in 2022, exceeding the statutory 28 days. Further details of the 2019 consultation process are provided in **Section 4** and for the 2022 consultation process in **Section 6**.
- 13.1.7 Under the requirements of Sections 42 and 47 of the Act, consultation was held with particular stakeholders and groups. Under Section 42 this included prescribed consultees, local authorities and PILs, while local community consultees, residents, interest groups, businesses and airport users were consulted under Section 47. Please see **Section 4.5** and **Appendix D** for further details of who was consulted in 2019. Further details of who was consulted in 2022 is in **Section 6.4** and **Appendix I**.

13.1.8 In accordance with Section 49 of the Act, the applicant has had due regard for all responses received, carefully considered them and used them to inform the Proposed Development. More detailed information is set out in the 'due regard' tables in **Appendix L** for the 2019 statutory consultation and **Appendix M** for the 2022 statutory consultation.

13.1.9 In accordance with Section 49 of the Act, in response to consultation feedback, the Applicant has made changes to the Proposed Development as described in **Section 11** and **Section 12** for the 2019 and 2022 statutory consultations respectively.

## 13.2 Continued engagement undertaken since the last statutory consultation

13.2.1 The Applicant has continued to engage with host and neighbouring authorities, Prescribed Consultees, the community and PILs throughout the preparation of the application for development consent. This engagement will continue after submission of the application for development consent.

## 13.3 Additional PILs not consulted

13.3.1 As a result of the Applicant's ongoing diligent inquiry into land interests affected by the Proposed Development, the Applicant carried out additional checks prior to finalising the **Book of Reference [TR020001/APP/3.02]** and in advance of submission of the application for development consent.

13.3.2 As is often the case, especially where there are so many PILs, this process identified 421 PILs who have not previously been consulted on the proposals. Of these 24 are Category 1 and Category 2 persons where land or rights in land are proposed to be acquired, and 397 are Category 3 persons where no land is to be acquired. These categories are considered in further detail below.

13.3.3 These new PILS relate almost entirely to a situation where one of the many property titles in the **Book of Reference [TR020001/APP/3.02]** has changed hands since the previous statutory consultation which had taken place in 2022. The relevant properties in question were consulted, the letter was simply addressed to the previous owner.

13.3.4 Of the further 24 Category 1 (owners, lessees or tenants) or Category 2 (those with an interest in land) parties were identified prior to submission in February 2023. The majority (12) of these new parties arose as a result of the ad medium filium rule, which is a presumption that landowners own the subsoil in unregistered highway adjacent to their properties, up to the half way point of the road. The Applicant had consulted the predecessors to these parties as part of its statutory consultation in 2022. The remaining interests arose as a result of land referencing exercises such as reviews of Land Interest Questionnaires and title information from HM Land Registry.

13.3.5 There are a further 397 Category 3 parties (right to make a relevant claim) without land subject to acquisition were also identified. The Applicant had also consulted the predecessors to these parties as part of its statutory consultation in 2022. These new entries were identified following receipt of updated



information at HM Land Registry, the most recent set of data being received by the Applicant in December 2022. Given the significant scale of the Applicant's Category 3 boundary, these refreshes were carried out to ensure the **Book of Reference [TR020001/APP/3.02]** was as up to date as possible prior to submission.

- 13.3.6 Whilst this is a large number of 'new' PILs, it is reflective of the fact that a particular feature of airports and associated aircraft noise means that a large number of PILs have been identified which corresponds to the large size of the Category 3 boundary adopted by the Applicant. As set out in the **Statement of Reasons [TR020001/APP/3.01]**, this boundary was set following advice from environmental consultants. The Applicant ascertained Category 3 parties based on those within the 51dBLAeq,8h noise contour and incorporated an additional 200m buffer. It is acknowledged, that all Category 3 parties are affected persons, but there is a difference in effect between these parties who do not have interests subject to compulsory acquisition and those in Category 1 and 2 who do.
- 13.3.7 Given the late stage at which these parties were identified, there was insufficient time remaining to consult them and have regard to their responses prior to submission of the application for development consent. Paragraph 51 of the relevant guidance (Planning Act 2008: Guidance on the Pre-application process, March 2015) (Ref 3) anticipates this situation and states:
- "...it is understood that land interests change over time and that new or additional interests may emerge after an applicant has concluded statutory consultation but just before an application is submitted. In such a situation, the applicant should provide a proportionate opportunity to any new person identified with a land interest to make their views known on the application. Where new interests in land are identified very shortly before the intended submission of an application, despite diligent efforts earlier in the process it may be difficult at that stage for applicants to consult and take account of any responses from those new interests before submitting their application as intended. If this situation arises applicants should be proactive and helpful in ensuring that the person understands how they can, if they so wish, engage with the process if the application is accepted for examination."*
- 13.3.8 In accordance with the guidance set out above, the Applicant wrote to each of these parties in February 2023, confirming that they had now been identified as owning an interest in land that was affected by the Proposed Development. The letters confirmed that, while there was insufficient time to consult them under Section 42 of the Planning Act, they would, in due course, be able to provide comments on the Proposed Development during the next stage of the planning process, if the application for development consent was accepted for examination by the Planning Inspectorate.
- 13.3.9 The Category 1 or 2, and Category 3 parties received different letters, reflecting the different levels of impact. Category 1 or 2 parties were provided with details of their land interests. The Applicant provided an email and phone number in case recipients had queries on how they could engage with the process further. The Applicant also referred the parties to the Planning Inspectorate's website

for further information, and specifically the web page for the application for development consent where such parties could sign up for email updates.

- 13.3.10 Copies of these letters are set out in **Appendix N** of this report. A list of these consultees can be found in **Appendix N**.

## GLOSSARY

<b>Term</b>	<b>Definition</b>
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
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

<b>Term</b>	<b>Definition</b>
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
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

<b>Term</b>	<b>Definition</b>
DoWCoP	Definition of Waste: Code of Practice
DS	Do-Something
ECC	Essex County Council
EEAST	East of England Ambulance Service
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
GVA	Gross Value Added
HAWRAT	Highways Agency Water Risk Assessment Tool
HA	Host Authorities

<b>Term</b>	<b>Definition</b>
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
Outline LBMP	Outline Landscape and Biodiversity Management Plan
LCA	Landscape Character Area
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

<b>Term</b>	<b>Definition</b>
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
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

<b>Term</b>	<b>Definition</b>
PPG	Planning Practice Guidance
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
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



<b>Term</b>	<b>Definition</b>
TA	Transport Assessment
TP	Travel Plan
UK HSA	UK Health Security Agency
UXO	Unexploded Ordnance
WCHs	Walkers, cyclists and horse riders
WDR	Works Description Report
WFD	Water Framework Directive
WHO	World Health Organisation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

## REFERENCES

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<sup>1</sup> Planning Act 2008, UK Public General Acts, 2008

<sup>2</sup> London Luton Airport Limited, 2019, London Luton Airport Vision for Sustainable Growth 2020-2050.

<sup>3</sup> Planning Act 2008, Guidance on the pre-application process, 2015.

<sup>4</sup> Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended).

<sup>5</sup> Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations').

<sup>6</sup> 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008.

<sup>7</sup> Compulsory Purchase Act 1965.

<sup>8</sup> Land Compensation Act 1975.

<sup>9</sup> A Net Zero Strategy for Luton Rising, Luton Rising (2022), available on Luton Rising's website.

<sup>10</sup> A Net Zero Strategy for Luton Rising, Luton Rising (2022), available on Luton Rising's website.