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London Luton Airport Expansion

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Volume 1 Application Information

1.03 Introduction to the Application

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Order 202x**

1.03 INTRODUCTION TO THE APPLICATION

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1 INTRODUCTION

1.1 Purpose of this document

- 1.1.1 Luton Rising (a trading name of London Luton Airport Limited) ('the Applicant') has submitted an application under Section 14 of the Planning Act 2008 (Ref 1.1) to the Secretary of State via the Planning Inspectorate for an order to grant development consent (DCO) for the expansion of London Luton Airport ('the airport') to 32 million passengers per annum (mppa) (hereby referred to as 'the Proposed Development').
- 1.1.2 This document provides an accessible guide to the Proposed Development, Applicant and the application documentation.
- 1.1.3 It gives an overview of the Proposed Development for which the Applicant seeks development consent and highlights the benefits that will be delivered by the Proposed Development.

1.2 Structure of this document

- 1.2.1 The document comprises seven chapters as described below:
- a. **Chapter 1** – introduces this document;
 - b. **Chapter 2** – provides an overview of the Applicant;
 - c. **Chapter 3** – provides an overview of the need for the Proposed Development;
 - d. **Chapter 4** – provides a description of the Proposed Development, how the Proposed Development has evolved and approach to phasing;
 - e. **Chapter 5** – provides an overview of the benefits that will be delivered by the Proposed Development;
 - f. **Chapter 6** – provides a summary of how adverse effects have been limited and mitigated; and
 - g. **Chapter 7** – provides an overview of the application documentation.

2 THE APPLICANT

- 2.1.1 London Luton Airport is wholly owned by Luton Borough Council (LBC) through the company London Luton Airport Limited (trading as Luton Rising), which was incorporated in 1986. Luton Rising 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.
- 2.1.2 In 1998, London Luton Airport Limited entered into a Concession Agreement with London Luton Airport Operations Limited (LLAOL) for the management, operation and development of the airport, which will last in its current form until 2032.

2.1.3 Whilst LLAOL is responsible for the day to day running of the airport, the Applicant takes significant responsibility for the long-term vision and planning of the airport's future to ensure that the benefits to the local and regional area are fully realised. The Proposed Development is being promoted by the Applicant but the current operator, LLAOL, has worked with the Applicant in developing the scheme and how it interfaces with the current airport operation. LLAOL remains responsible for operational matters, including the process of airspace change.

3 NEED FOR THE PROPOSED DEVELOPMENT

3.1 The context for need

3.1.1 There is clear government policy support for aviation growth and for airports making best use of their runways, as set out in various national aviation policy documents including:

- a. Aviation Policy Framework (APF) (Ref 3.1);
- b. Airports National Policy Statement (ANPS) (Ref 3.2);
- c. Beyond the Horizon - The future of UK aviation, making best use of existing runways (MBU) (Ref 3.3);
- d. Flightpath to the Future (FttF) (Ref 3.4); and
- e. the Jet Zero Strategy (Ref 3.5).

3.1.2 All of the above policy documents are important and relevant to the decision. The ANPS and MBU are clear that applications seeking to make more intensive use of existing runways will be considered on their merits.

3.1.3 Government policy on aviation is clear that increases in aviation capacity are necessary and that they bring significant benefits. The Government recognises that by not increasing airport capacity in the South East of England, capacity constraints would impose increasing costs on the rest of the economy over time, lowering economic output by making aviation more expensive and less convenient to use, with knock-on effects in lost trade, tourism and foreign direct investment.

3.1.4 The Proposed Development is making use of the existing runway, consistent with policy as set out in the ANPS and MBU policy documents. It is being designed in a way that is consistent with the overarching and longstanding principle of balancing the economic benefits and environmental costs of development. The Proposed Development will bolster initiatives to support the sustainable recovery of the sector, improve the competitiveness of the market for airlines seeking opportunities for growth in the South East of England and create opportunities for enhanced connectivity to support the broader economic growth of the UK economy as well as delivering local benefits.

3.1.5 The **Need Case [TR020001/APP/7.04]** confirms that additional capacity is urgently required if the airport is to keep pace with demand. The Government has designated LBC as a 'Level 1' priority area for its Levelling Up Fund – this is a place deemed in most need of investment through the Fund. The continued

success and growth of the airport is fundamental to realising the Government's Levelling Up ambitions.

- 3.1.6 The airport is the largest employer in Luton, providing 10,900 jobs directly and supporting a further 900 jobs through its supply chain in 2019. Its growth has the potential to generate substantial employment both directly and through attracting other businesses to locate in the area.
- 3.1.7 The economic impact of the airport spreads much further than just the town, supporting the broader economic objectives of the Oxford-Cambridge Arc. At the national level, the airport supported 28,400 jobs and £1.8 billion in economic activity in 2019, of which 16,500 jobs and £1.1 billion of economic value were created across the 'Three Counties' of Bedfordshire, Buckinghamshire, and Hertfordshire, including in Luton itself.
- 3.1.8 The economic benefits of the Proposed Development are discussed further in **Section 5** below and are set out in full in the **Need Case [TR020001/APP/7.04]**. In summary¹:
- a. At an expanded capacity of 32 mppa, the airport would support a further 10,800 jobs, and £1.45 billion in economic activity across the UK.
 - b. Most importantly, many of these new jobs would be realised locally, with an increase of 6,100 jobs and a boost of £0.9 billion in economic activity within the Three Counties region.
 - c. Of the total number of additional jobs and increase in economic activity in the Three Counties region, 4,400 jobs and £0.7 billion would be realised in Luton. Hence, with growth, the impact in Luton will be even more marked because of the relatively much greater levels of underlying deprivation – this is truly levelling up.

3.2 Why London Luton Airport?

- 3.2.1 The role of the airport is important in the context of the Government's 'levelling up' agenda. Luton itself is identified as a high priority area for the Levelling Up Fund and has recently been awarded £20m from the fund. The role of the airport in supporting further regeneration is recognised and future growth will substantially increase this role.
- 3.2.2 Projections of future demand to use the airport have been developed and is detailed in the **Need Case [TR020001/APP/7.04]**. In the light of the growth projections, notwithstanding the impact of Covid-19 restrictions on travel in the short-term, additional airport capacity is urgently needed at the airport in order to keep pace with demand.
- 3.2.3 Similar arguments about growing demand and economic impact can, justifiably, be made for most UK airports. Where the airport differs markedly is in two respects:

¹ Note that the figures reported in sub-paragraphs a-c are the net difference between the 'with development' (Core Planning Case) and 'without development' scenarios in 2043, as reported in the Need Case [TR020001/APP/7.04].

- a. The first is that the airport is part of, and indeed a builder of, the local community. This isn't about a budget line called Corporate Social Responsibility. This is about an ethos which is central to the airport, built on its status as a community-owned business and the sole shareholder being LBC. As a council-owned airport, the airport is able to draw on resources, form partnerships, and focus on social value in a way that is unique to Luton.
- b. The contribution made by the airport to the council's frontline services amounts to 15% of LBC's income. On top of that, Luton Rising also makes a direct social contribution through the revenues received from the operation of the airport. Significant support is given to community groups and services in Luton and the surrounding area, amounting to around £8 million a year. This is 20 times more per passenger than any other UK airport.
- c. As these revenues grow with the Proposed Development, it is intended that these local and community investments will increase pro-rata to growth. In particular, Luton Rising proposes to establish the Community First Fund providing £1 per passenger from growth above 18 mppa. Overall, these direct social contributions will be substantial and in excess of similar schemes in place at other UK airports. This adds further to the potential beneficial impacts of the Proposed Development.

4 THE PROPOSED DEVELOPMENT

4.1 Overview of the Proposed Development

- 4.1.1 The Proposed Development builds on the current operational airport with the construction of a new passenger terminal and additional aircraft stands to the north east of the runway.
- 4.1.2 This will take the overall passenger capacity from 18 mppa to 32 mppa.
- 4.1.3 In addition to the above, and to support the initial increase in demand, the existing infrastructure and supporting facilities will be improved in line with the short-term requirements for additional capacity.
- 4.1.4 Key elements of the Proposed Development include:
 - a. extension and remodelling of the existing passenger terminal (Terminal 1) to increase its capacity;
 - b. new passenger terminal building and boarding piers (Terminal 2);
 - c. earthworks to create an extension to the current airfield platform; the vast majority of material for these earthworks would be generated on site;
 - d. airside facilities including new taxiways and aprons, together with relocated engine run-up bay and fire training facility;
 - e. landside facilities, including buildings which support the operational, energy and servicing needs of the airport;

- f. enhancement of the existing surface access network, including a new dual carriageway road accessed via a new junction on the existing New Airport Way (A1081) to the new passenger terminal along with the provision of forecourt and car parking facilities;
- g. extension of the Luton Direct Air to Rail Transit (Luton DART) with a station serving the new passenger terminal;
- h. landscape and ecological improvements, including the replacement of existing open space; and
- i. further infrastructure enhancements and initiatives to support the target of achieving zero emission ground operations by 2040², with interventions to support carbon neutrality being delivered sooner including facilities for greater public transport usage, improved thermal efficiency, electric vehicle charging, on-site energy generation and storage, new aircraft fuel pipeline connection and storage facilities and sustainable surface and foul water management installations.

4.1.5 A detailed description of the Proposed Development is provided in **Chapter 4** of the Environmental Statement (ES) [TR020001/APP/5.01].

4.1.6 On 1 December 2021, the local planning authority (Luton Borough Council) resolved to grant permission for the current airport operator (LLAOL) to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa. Since then, the application was called-in and referred to the Secretary of State for determination instead of being dealt with by the local planning authority. The inquiry to consider the called-in application opened on Tuesday 27 September 2022 and ran until Friday 18 November 2022.

4.1.7 At the time of submission of the application for development consent the outcome of the inquiry is still unknown. All of the assessment work to date has been undertaken using a 'baseline' of 18 mppa. In anticipation that LLAOL's 19 mppa planning application may be approved, however, the environmental assessments supporting Luton Rising's application for development consent included sensitivity analysis of the implications of the permitted cap increasing. As a result, it is concluded that the environmental assessments are representative of the likely significant effects of expansion, whether the baseline is 18 mppa or 19 mppa. **Chapter 5** of the ES [TR020001/APP/5.01] outlines the approach to taking account of this application in the assessment of the proposals.

4.2 Approach to delivery phasing

4.2.1 The Proposed Development is described in three phases for the purposes of assessment: Phase 1, Phase 2a and Phase 2b. These are 'assessment phases'. In practice, the Proposed Development will be delivered in undefined increments which appropriately respond to demand over time.

² This is a Government target, for which the precise definition will be subject to further consultation following the *Jet Zero Strategy*, and which will require further mitigations beyond those secured under the DCO.

4.3 How the Proposed Development has evolved

- 4.3.1 The Proposed Development is the outcome of a rigorous process of optioneering and scheme development. At the heart of this has been a commitment to iterative design, which has sought to balance evolving drivers and requirements, maximise benefits, minimise negative impacts, and which has been informed by the views of stakeholders and the community.
- 4.3.2 This section gives an overview of how the Applicant arrived at the Proposed Development and explains the context in which the Applicant has made the choices it has. For full detail, reference should be made to the **Design and Access Statement [TR020001/APP/7.03]**, the **Consultation Report [TR020001/APP/6.01]** and **Chapter 3** of the ES [TR020001/APP/5.01] which explain the optioneering process in full.
- 4.3.3 The design development process for the Proposed Development began in 2018 where at the first stage of optioneering, seven strategic masterplan options were developed for evaluation. Through the evaluation process, the seven options were condensed down to four. Later in 2018, views were sought on these four options, including one which was identified as the emerging preferred option, via a non-statutory public consultation.
- 4.3.4 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).
- 4.3.5 Responses to all rounds of consultation have been carefully considered and used to inform the Proposed Development. Further detail on this can be found in the **Consultation Report [TR020001/APP/6.01]** and **Consultation Report Appendices [TR020001/APP/6.02]**.
- 4.3.6 Informal stakeholder engagement has also been undertaken throughout the pre-application stage. The importance of informal dialogue with stakeholders throughout the design process is recognised. Providing regular and meaningful opportunities for stakeholders to input via ongoing engagement has been central to the Applicant's approach.
- 4.3.7 Host and neighbouring authorities have been active participants in the development of the proposals, representing the interests and concerns of surrounding communities. They have worked collaboratively to ensure that, if the Proposed Development gains consent, it not only responds to aviation demand, but also makes a positive contribution to Luton and the Three Counties region. Engagement with the local authorities has helped the Applicant understand local issues and drivers to make informed choices about the sort of scheme the Applicant wants to promote.
- 4.3.8 The Applicant has carried out engagement with the host local 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 challenges posed by stakeholders through this engagement has helped the Applicant to develop proposals for an expanded airport which, not only respond to the urgent demand for airport capacity but are socially enriching and environmentally responsible.

Statements of Common Ground

- 4.3.9 The Applicant has undertaken extensive engagement with prescribed consultees, statutory undertakers and key stakeholders throughout the pre-application period. It continues to work proactively with stakeholders to prepare Statements of Common Ground (SoCGs) to aid the Examining Authority during the examination process and aims to submit these to the Examining Authority as soon as possible.
- 4.3.10 The development and agreement of SoCGs is an iterative process and the Applicant anticipates that the draft SoCGs will be updated as discussions between parties' progress during examination, and that further SoCGs may need to be developed with additional stakeholders as required.
- 4.3.11 The following SoCGs will be developed before and during the examination period, together with any additional ones requested by the Examining Authority:
- a. A joint SoCG between the host local authorities, Luton Borough Council, Central Bedfordshire Council, North Hertfordshire District Council, Hertfordshire County Council and Dacorum Borough Council **[TR020001/APP/7.26];**
 - b. Affinity Water **[TR020001/APP/7.19];**
 - c. Bedfordshire Police **[TR020001/APP/7.18];**
 - d. Civil Aviation Authority **[TR020001/APP/7.21];**
 - e. Cadent Gas **[TR020001/APP/7.17];**
 - f. Environment Agency **[TR020001/APP/7.27];**
 - g. Historic England **[TR020001/APP/7.23];**
 - h. National Highways **[TR020001/APP/7.25];**
 - i. Natural England **[TR020001/APP/7.28];**
 - j. NATS **[TR020001/APP/7.22];**
 - k. Network Rail **[TR020001/APP/7.24];**
 - l. Prax Downstream UK plc **[TR020001/APP/7.14];**
 - m. Shell UK Ltd **[TR020001/APP/7.15];**
 - n. Thames Water **[TR020001/APP/7.20];**
 - o. UK Health Security Agency and Office for Health Improvement and Disparities **[TR020001/APP/7.29];** and

p. World Fuel Services **[TR020001/APP/7.16]**.

Letters of support

- 4.3.12 Given the significant positive impact the airport has on the local community and regional economy the Applicant has been receiving letters from groups and local businesses in support of the application for development consent. This has included, but are not limited to local charities, businesses, Bedfordshire Chamber of Commerce, Bedfordshire, Luton and Milton Keynes Integrated Care Board, LLAOL and South East Midland Local Enterprise Partnership.
- 4.3.13 At the time of submission 17 letters have been received (see **Appendix A**) and more are expected to be received in the coming weeks and months. This reflects the vital impact the airport currently has and the positive impact an expanded airport would deliver.

Sustainability and net zero

- 4.3.14 As an airport operating in a climate emergency, the Applicant is committed to demonstrating how aviation growth can take place sustainably.
- 4.3.15 To demonstrate dedication to sustainability, the Applicant is proposing a unique framework to make sure that environmental Limits are observed as the airport grows. Green Controlled Growth (or GCG) is a key value of Luton Rising in its ambition to enable the sustainable expansion of Luton Airport.
- 4.3.16 Luton Rising has developed a unique GCG framework to make sure that airport growth takes place within environmental Limits, which aligns with the Government's Jet Zero Strategy. Crucially, these Limits are not vague aspirations – they will be legally binding, overseen by an independent body called the Environmental Scrutiny Group (ESG). Further detail is provided in **Green Controlled Growth Framework (GCG) [TR020001/APP/7.08]**. GCG will set defined Limits for air quality impacts, greenhouse gas emissions, aircraft noise and surface access mode share. The GCG proposals are some of the most far-reaching commitments to sustainability ever put forward by a UK airport.
- 4.3.17 Beyond GCG, the design of the Proposed Development caters to current net-zero development opportunities, as well as safeguarding for infrastructure that may be required to support future technological improvements.
- 4.3.18 Proposals also include rainwater harvesting and a commitment to designing Terminal 2 to 2013 BREEAM Excellent principles ensuring that it is energy efficient with appropriate installations and equipment, together with thermally efficient materials and shading.

Landscape

- 4.3.19 Valued landscape assets have, wherever possible, been protected throughout the design process and improvements to open space have been sought including the provision of an area of replacement open space for the benefit of local people. The **Strategic Landscape Masterplan [TR020001/APP/5.10]** provides an illustrative masterplan of the landscaping proposed and also

includes landscape design principles to provide clear guidance for the future development of the Proposed Development's detailed landscape design.

- 4.3.20 Development within the Green Belt has been minimised to essential elements. Such development has only been proposed after full consideration of all possible alternatives and, in accordance with planning policy, with clear evidence that there are 'very special circumstances' justifying its location within the Green Belt and 'preserve its openness'. The **Planning Statement [TR020001/APP/7.01]** submitted as part of this application provides the full Green Belt assessment for the Proposed Development.

Diversity and inclusion

- 4.3.21 The **Employment and Training Strategy [TR020001/APP/7.05]** sets out how the Applicant will address barriers to work and ensure the opportunities generated by growth of the airport are available to all.
- 4.3.22 The design of the Proposed Development caters for people with protected characteristics under the Equality Act 2010 (Ref 4.1). The **Equality Impact Assessment [TR020001/APP/7.12]** submitted as part of this application provides a full assessment of potential differential impacts of the Proposed Development on people with protected characteristics.

Surface access

- 4.3.23 Emphasis is placed on sustainable modes of transport, including reaping the benefits afforded by the Luton DART system, which will connect rail passengers to the airport from Luton Airport Parkway station, the provision of enhanced facilities for buses and coaches at Terminal 2 and, through GCG, the Applicant is committing to public and sustainable transport mode share limits for both passengers and staff. The **Framework Travel Plan [TR020001/APP/7.13]** builds on these limits by establishing the process through which more ambitious targets will be set in future Travel Plans which will be refreshed every five years in response to prevailing circumstances at the time.
- 4.3.24 Highway improvements are included in the Proposed Development. These will be brought forward as and when required, in response to a comprehensive programme of monitoring. Further detail on these improvements and the associated monitoring is provided in the **Surface Access Strategy [TR020001/APP/7.13]**. This Strategy, which also sets out proposals for parking controls and traffic calming measures to minimise impacts on local roads and parking.

Land use

- 4.3.25 Ensuring land is used efficiently and sustainably has been a golden thread running through the design development process. Wherever possible, improvements will be made to existing assets rather than re-building them (for example, optimisation of Terminal 1).
- 4.3.26 The Proposed Development beyond the existing airport boundary has sought to make efficient use of land by ensuring that, wherever possible, multiple functions and benefits are delivered on each site – for example, replacement

open space proposals to the east of Wigmore Valley Park also seek to contribute to the gains the Proposed Development will deliver for biodiversity.

5 THE BENEFITS THAT WILL BE DELIVERED BY THE PROPOSED DEVELOPMENT

5.1 Introduction to benefits

5.1.1 Optimising the benefits that the Proposed Development will deliver, while minimising any negative impacts, has been a fundamental ethos in the approach. The Applicant wants the proposal to benefit as many people as possible, not only to those who use the airport, but also the wider Luton community, Three Counties and the rest of the UK.

5.1.2 The following sub-sections outline the main benefits of the Proposed Development across key groups of stakeholders, including:

- a. Luton and the Three Counties;
- b. future passengers; and
- c. airlines, the airport operator, and other airport users.

5.2 Luton and the Three Counties

Economic benefits and employment

5.2.1 As summarised in Section 3 and set out in full in the **Need Case [TR020001/APP/7.04]**, growth at the airport will have substantial economic and employment benefits for Luton and the wider Three Counties region

5.2.2 The airport is the largest employer in Luton and its growth has the potential to generate substantial employment both directly and through its supply chain. As a result of the Proposed Development, the total operational employment supported by the airport in the Three Counties in 2043 is forecast to grow to 22,600 jobs, an increase of 6,100 jobs over 2019. It is also 8,600 more jobs than would be supported by the Without Development Case in 2043. Of these jobs, 4,400 would be realised in Luton itself.

5.2.3 In addition to the new jobs supported by expanded operations of the airport, new jobs will also be supported through construction of the Proposed Development. It is estimated that over the construction period, a total of 628 full-time equivalent jobs would be directly supported.

5.2.4 With the Proposed Development, the economic impact of the airport will increase considerably. At 32 mppa, the Three Counties can expect to receive an economic boost of over £760 million (compared to the 'without development' scenario). Nearly £600 million of this would be in Luton.

5.2.5 The Applicant is committed to ensuring that future jobs created at the airport will offer opportunities for the local and surrounding community. The **Employment and Training Strategy [TR020001/APP/7.05]** sets out how the Applicant and its strategic partners can maximise employment benefits of the Proposed Development for local people through training support for residents and businesses at the airport. Through the opportunities supported by the Proposed Development, the Applicant will work with LBC to make Luton a real living wage

town, so that working people do not struggle. The operator of the airport, LLAOL, has already implemented the real living wage and during operations will work with employers at the airport to support the adoption or maintenance of real living wage across the airport.

- 5.2.6 Across the UK, the total operational employment supported by the airport in the UK with the Proposed Development in 2043 is forecast to be 39,200 jobs, an increase of 10,800 jobs over 2019. It is also 15,000 more jobs than are supported without the development in 2043. The contribution of the airport's operation to the UK economy would increase by over £1.3 billion by the time the airport is handling 32 mppa, compared to if the airport expansion did not come forward.

Connectivity

- 5.2.7 The airport is central to the local economy and is strategically positioned in the broader region, where it serves as an important connectivity asset.
- 5.2.8 At the most local level, the proposals will enable journey time savings for residents living nearby. Giving passengers the opportunity to fly from the airport to a wider range of destinations will save time and money, amounting to around £512 million in journey time savings (discounted over a 60-year period) for air travellers to and from the Three Counties.
- 5.2.9 In tandem with passengers departing from Luton, the Proposed Development will result in an increase in visitors to the areas around the airport, in turn supporting the local tourism economy and generating increased GDP and more jobs. At 32 mppa, inbound tourist activity via the airport could be supporting around £150 million in Gross Value Added (GVA) each year across the Three Counties and around 2,030 jobs in the tourism sector. Around £13 million and 200 of these jobs would be realised in Luton.
- 5.2.10 The Proposed Development will provide connectivity benefits for Luton and the wider Three Counties, making it more attractive for businesses to locate within the area. By offering a wider range of air service connections, including to key business destinations, expansion of the airport will improve the attractiveness of the area to locate new and expand existing businesses, creating further employment opportunities and wider economic benefit. This is particularly relevant to supporting the economic ambitions of LBC and the wider Oxford-Cambridge Arc.
- 5.2.11 By enabling more business travel to occur, productivity growth will be positively affected, which in turn supports greater trade and helps secure investment. This beneficial effect is expected to increase GDP in the Three Counties region by £108 million per year once the expanded airport reaches 32 mppa, compared to 2019.
- 5.2.12 Furthermore, the expanded airport will also further contribute to the UK economy by improving air connectivity, a crucial aspect in ensuring that the UK remains competitive globally and enabling the airport to play its part achieving the government's vision of a Global Britain (Ref 5.1).

Community

- 5.2.13 Since 1998 the airport has provided more than £257 million to support local front-line services of LBC, together with an additional £155 million for community investment projects and local charities.
- 5.2.14 As detailed in **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.11]** Community First will provide £1 in funding for every additional passenger above the passenger cap at the point the application for development consent is approved. This funding will be taken from the additional revenue made as a result of the Proposed Development and will be in addition to the existing Community Funding Programme which will continue. The Community First fund will support projects which aim to tackle either local decarbonisation efforts or address pockets of deprivation across the region.
- 5.2.15 To share the benefits beyond Luton the Applicant proposes to put 40% of the proceeds of Community First into a fund available for use only in areas outside of Luton. The remaining 60% of the Community First funds will be made available to support projects in Luton, which has some of the most deprived areas within the East of England.
- 5.2.16 Increased revenue resulting from growth of the airport will also provide the opportunity for Luton Rising to provide additional funding to support frontline council services and priorities such as those identified in Luton Council's Luton 2040 Strategy (Ref 5.2).

Surface access

- 5.2.17 Through the **GCG Framework [TR020001/APP/7.09]**, the Applicant will set legally binding controls on the mode share limits for passengers, as well as employees working at the airport.
- 5.2.18 The Applicant is proposing a limit of a minimum of 45% of passengers and at least 40% of employees accessing the airport by public and sustainable transport at the point the airport reaches a throughput of 32 mppa.
- 5.2.19 Contributions towards Luton-wide cycling and walking initiatives will give back to the town by making active travel a safe and convenient mode choice for residents.

Open space

- 5.2.20 The Proposed Development has sought to not only mitigate the negative impacts of the proposals on existing open space, but where possible, to go further by providing enhancements.
- 5.2.21 The Proposed Development will increase the size of Wigmore Valley Park by at least 10% and any re-provided public open space will be at least as good in usefulness, attractiveness, quality and accessibility as that which will be lost. The Applicant is committed to delivering the replacement open space ahead of other works commencing within the existing parkland and will work with the relevant authorities to vest the park in a new Community Trust.

5.2.22 Proposals for Wigmore Valley Park are set out in more detail in the **Strategic Landscape Masterplan [TR020001/APP/5.10]**.

Environment

5.2.23 The Applicant is committed to delivering a net gain in biodiversity of at least 10% as part of the Proposed Development. This will be achieved by:

- a. planting almost 11 hectares of native broadleaf woodland;
- b. planting almost 2 hectares of native scrub vegetation;
- c. planting of new hedgerows or parkland trees;
- d. planting or restoring over 17.5km of mixed-species hedgerows;
- e. delivering nearly 38 hectares of neutral meadow grassland, over 27 hectares of low-intensity grazed grassland and over 12.5 hectares of low-intensity grazed calcareous grassland; and
- f. retaining, protecting and improving the management of over 9.5 hectares of existing woodland vegetation.

5.2.24 The Applicant is also committed to promoting a scheme which minimises its carbon footprint. To this end, the Proposed Development includes provision for solar energy generation, battery storage, electric vehicles (both airside and landside), ground source heat-pumps, rainwater harvesting, greywater recovery and re-use, water conservation technologies and sustainable waste management.

5.2.25 The remediation of the former landfill site, and the installation of pollution prevention measures, are expected to result in significant beneficial effects, by reducing the risk of existing contamination polluting groundwater and the River Mimram, which is groundwater fed. Furthermore, the proposed water treatment plant reflects a sustainable approach to water quality and quantity by reducing impacts on existing local water networks. The water from the water treatment plant will be 100% recyclable into non-potable water to be used for irrigation purposes, flushing toilets and other non-potable water needs.

5.3 Future passengers

5.3.1 The Proposed Development will ensure that the airport is able to respond to future demand, enabling future passengers to use Luton as their airport of choice. As set out in **Section 5.2** above, this in turn will lead to shorter journey times and a greater range of services.

5.3.2 The Proposed Development will also greatly enhance the passenger experience at the airport. Passengers will benefit from improved facilities and the surface access proposals will make for easier access to and through the airport over the longer term.

5.3.3 Passengers using Terminal 1 will benefit from a larger departure lounge. A new pier is proposed, which will reduce the need for passengers to be bussed to their aircraft. Terminal 2 will be a brand-new terminal, designed with passenger

experience in mind, incorporating the latest technologies and to 2013 BREEAM Excellent principles.

- 5.3.4 Passengers arriving by rail will be able to arrive at Terminal 2 via the Luton DART extension. Integrated ticketing between the national rail network at Luton Airport Parkway Station and the Luton DART will provide a more seamless connection to the airport.
- 5.3.5 The delivery of the Airport Access Road will also improve connectivity to the airport and there will be a strengthened coach offer with a new hub at Terminal 2 (in addition to the existing coach services at Terminal 1), enabling passengers arriving by coach to be dropped off directly at the appropriate terminal. The Applicant will engage with bus operators to explore the possibility of creating new and extended routes, better connecting the airport to more places, in particular urban areas and transport hubs.
- 5.3.6 Beyond the proposed public transport improvements, the Applicant is committed to facilitating active travel modes as a safe and realistic choice for those who wish to walk or cycle. High quality cycle parking and facilities at Terminal 2, along with improved pedestrian and cycle wayfinding across the airport will enable this.

5.4 Airlines, the airport operator, and other airport users

- 5.4.1 The Proposed Development will enable the airport to increase its capacity in response to demand, which in turn will deliver benefits for the airlines that operate from it. In addition, airlines and other airport users will benefit from being able to operate at an airport from which passengers want to use (refer to **Section 5.3**, which sets out the benefits for future passengers).
- 5.4.2 An additional surface movement radar on the airfield will maintain safety and monitoring of aircraft taxiing on the taxiway network during periods of low visibility.

6 HOW ADVERSE EFFECTS HAVE BEEN LIMITED AND MITIGATED

- 6.1.1 While the benefits of the Proposed Development will be significant, it is recognised that expanding an airport also has the potential to give rise to negative effects. The Applicant's approach has sought to optimise the benefits for as many people as possible, while ensuring that the potential negative impacts of the proposals are avoided or otherwise, have been minimised and mitigated.
- 6.1.2 In line with best practice guidance (Ref 6.1), an iterative approach to design has been taken, applying the mitigation hierarchy in the development of proposals. The mitigation hierarchy (as defined in **Appendix 8.5** of the ES **[TR020001/APP/5.02]**) is clear that the priority should be to avoid or prevent potential adverse effects in the first instance, by making modifications to the design of the proposals. Where it is not possible to avoid or prevent an impact, measures should then be implemented to reduce the significance or likelihood of the impact. If it is not possible to avoid or reduce a significant effect, compensation or remediation should be considered.
- 6.1.3 Extensive environmental information has been gathered to support the development of proposals. Through the Environmental Impact Assessment (EIA) process, the likely significant environmental effects of the Proposed Development have been identified, together with a comprehensive suite of measures to avoid or reduce these. The results of the EIA, including mitigation proposals, are set out in the **ES [TR020001/APP/5.01]** submitted as part of the application for development consent.
- 6.1.4 The EIA has been supported by extensive stakeholder engagement, via TWGs, where key stakeholders across a full range of technical areas (e.g. air quality, biodiversity, climate change and greenhouse gases, and noise) have been brought together. Wherever possible, the Applicant has sought to reach agreement with stakeholders on the approach to assessment and key mitigation requirements.
- 6.1.5 The **GCG Framework [TR020001/APP/7.08]**, introduced at 4.3.15 above in this document, will ensure that impacts of particular importance to stakeholders (carbon, noise, air quality and surface access) are carefully controlled and that growth at the airport can only come forward within strict environmental Limits. GCG includes clear monitoring and enforcement mechanisms, and the airport's performance against the Limits would be overseen and scrutinised by a new independent body – the ESG. The Applicant's GCG proposals offer communities more certainty over the management of adverse effects, and more transparency and accountability than the existing regime at the airport, and indeed any other airport in the UK today.
- 6.1.6 The GCG framework therefore establishes an explicit commitment to link environmental performance to growth at the airport and, taken together with other proposed mitigation measures, ensures that impacts in the four key areas will be mitigated to the extent that limited -to-moderate adverse weight should

be accorded to these in the planning balance (as detailed in the **Planning Statement [TR020001/APP/7.01]**).

6.1.7 As part of this application for development consent, a number of supporting strategies and plans are provided and some of these are briefly summarised below:

- a. **Air Quality Monitoring Plan [TR020001/APP/7.08]** - This Monitoring Plan has been submitted as part of the proposed GCG Framework. The document will establish monitoring and reporting requirements for air quality within GCG. Failure to carry out monitoring and reporting in line with this document will constitute a breach of the DCO and may result in enforcement action.
- b. **Greenhouse Gas (GHG) Monitoring Plan [TR020001/APP/7.08]** - This Monitoring Plan has been submitted as part of the proposed GCG Framework. The document will establish monitoring and reporting requirements for GHG within GCG. Failure to carry out monitoring and reporting in line with this document will constitute a breach of the DCO and may result in enforcement action.
- c. **Outline Operational Noise Management (Explanatory Note) [TR020001/APP/5.02]** - This document contains the Operational Noise Management Plan which provides further detail and explanation on of the mitigation and compensation described in the assessment presented in **Chapter 16** Noise and vibration of the ES **[TR020001/APP/5.01]**.
- d. **Code of Construction Practice [TR020001/APP/5.02]** - Clear objectives have also been set within the CoCP for resource and waste management throughout the construction of the Proposed Development. These include the promotion and enhancement of circular economy principles through re-use and recycling; and promotion of sustainable procurement throughout the supply chain. The CoCP also confirms that materials (made ground and natural soils) outside of the area of historical landfill will be reused in accordance with the Materials Management Plan (MMP).
- e. **Outline Remediation Strategy for the Eaton Green Landfill [TR020001/APP/5.02]** - The Outline Remediation Strategy includes construction phase measures to reduce risks to human health and the environment by the creation of an engineered cover system (which will include a gas management system) across the former landfill both landside and airside.

6.1.8 In developing proposals, the Applicant has sought to develop a scheme which optimises the benefits and limits harm wherever possible. The Applicant has taken great care to listen to stakeholders, who often had competing needs, and the approach taken by the Applicant in managing adverse effects is believed to be balanced and fair.

7 NAVIGATING THE APPLICATION

7.1 Documentation

7.1.1 The documents and reports that make up the application for development consent have been split into seven volumes listed in **Table 1.1**.

Table 1.1: Application volumes

Volume	Content
Volume 1: Application Information	Contains the completed application form, cover letter, Electronic Application Index, Section 55 Checklist, and this document – the introduction to the application for development consent.
Volume 2: Draft Development Consent Order	Outlines the legal powers the applicant is seeking to enable the Proposed Development.
Volume 3: Compulsory Acquisition Information	Provides evidence of why and where legal powers of compulsory acquisition are being sought.
Volume 4: Plans and Sections	Contains the plans which show where works are proposed.
Volume 5: Environmental Information	Shows how potential impacts on the environment has been assessed.
Volume 6: The Consultation Report	Provides details of the pre-application consultation undertaken on the Proposed Development and how the Applicant has had due regard to consultation feedback.
Volume 7: Other Documents	Includes additional documents produced in support of the application.

7.1.2 A list of documents within the application is set out in **Table 1.2** below.

Table 1.2: Application volumes and content

Document number	Document name
Volume 1: Application Information	

TR020001/APP/1.01	Cover letter and Section 55 Checklist
TR020001/APP/1.02	Application form
TR020001/APP/1.03	Introduction to the application
TR020001/APP/1.04	Electronic Application Index
TR020001/APP/1.05	GIS Shapefile of application boundary
Volume 2: Draft Development Consent Order	
TR020001/APP/2.01	Draft Development Consent Order
TR020001/APP/2.02	Explanatory Memorandum
TR020001/APP/2.03	Consents and Agreements Position Statement
TR020001/APP/2.04	DCO Validation Report
Volume 3: Compulsory Acquisition Information	
TR020001/APP/3.01	Statement of Reasons
TR020001/APP/3.02	Book of Reference
TR020001/APP/3.03	Funding Statement
Volume 4: Plans and Sections	
TR020001/APP/4.01	Location Plan
TR020001/APP/4.02	Scheme Layout Plans
TR020001/APP/4.03	Land Plans including Special Category Land Plans
TR020001/APP/4.04	Works Plans
TR020001/APP/4.05 <i>(Note: included as ES figures [TR020001/APP/5.03])</i>	Figure 8.1 Ecological Statutory Designated Sites [TR020001/APP/5.03] Figure 8.2 Ecological Non-statutory Designated Sites [TR020001/APP/5.03]

	Figure 8.3 Ecological Constraints Plan [TR020001/APP/5.03]
TR020001/APP/4.06 <i>(Note: included as ES figures [TR020001/APP/5.03])</i>	Figure 10.1 Location of Designated Cultural Heritage Assets (Plan 1 of 2) [TR020001/APP/5.03] Figure 10.2 Location of Designated Cultural Heritage Assets (Plan 2 of 2) [TR020001/APP/5.03] Figure 10.3 Location of Non-Designated Cultural Heritage Assets [TR020001/APP/5.03]
TR020001/APP/4.07 <i>(Note: included as ES figures [TR020001/APP/5.03])</i>	Figure 20.2 Groundwater Features [TR020001/APP/5.03] Figure 20.4 Water Framework Directive Water Bodies [TR020001/APP/5.03]
TR020001/APP/4.08	Streets, Right of Way and Access Plans
TR020001/APP/4.09	General Arrangement Drawings
TR020001/APP/4.10	Special Category Land Plans
TR020001/APP/4.11	Airport Access Road and Luton DART Long Section Drawings
TR020001/APP/4.12	Airport Boundary Plan
Volume 5: Environmental Information	
TR020001/APP/5.01	Environmental Statement (Main Report)
TR020001/APP/5.02	Environmental Statement – Appendices
TR020001/APP/5.03	Environmental Statement – Figures
TR020001/APP/5.04	Environmental Statement – Non-technical Summary
TR020001/APP/5.05	Scoping Opinion and Scoping Report
TR020001/APP/5.06	Statement of Statutory Nuisance
TR020001/APP/5.07	Flood Risk Assessment

TR020001/APP/5.08	Habitat Regulations Assessment No Significant Effects Report
TR020001/APP/5.09	Mitigation Route Map
TR020001/APP/5.10	Strategic Landscape Masterplan
Volume 6: Consultation Report	
TR020001/APP/6.01	Consultation Report
TR020001/APP/6.02	Consultation Report – Appendices
Volume 7: Other Documents	
TR020001/APP/7.01	Planning Statement
TR020001/APP/7.02	Transport Assessment
TR020001/APP/7.03	Design and Access Statement
TR020001/APP/7.04	Need Case
TR020001/APP/7.05	Employment and Training Strategy
TR020001/APP/7.06	Sustainability Statement
TR020001/APP/7.07	Green Controlled Growth Explanatory Note
TR020001/APP/7.08	Green Controlled Growth Framework
TR020001/APP/7.09	Design Principles
TR020001/APP/7.10	Draft Compensation Policies, Measures and Community First
TR020001/APP/7.11	Equality Impact Assessment
TR020001/APP/7.12	Surface Access Strategy
TR020001/APP/7.13	Framework Travel Plan

7.2 Volume 1: Application information

7.2.1 This volume provides details of the application information required by the Planning Inspectorate when submitting an application for development consent and how to navigate the documentation.

- a. **Application Cover Letter.** Covering letter for the application. This also includes the Section 55 Checklist.
- b. **Application Form.** A completed version of the Planning Inspectorate standard form which provides a high-level summary of the Proposed Development and the documents that have been submitted. It is a form that originates from Schedule 2 of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (Ref 7.1).
- c. **Introduction to the application.** This provides It gives an overview of the Proposed Development for which the Applicant seeks development consent and highlights the benefits that will be delivered by the Proposed Development. This also serves as a guide to facilitate navigation of the DCO application documentation providing a brief description of the volumes and documents that make up the application.
- d. **Electronic Application Index.** A list of the electronic file names for all of the DCO documents.
- e. **GIS shapefile for application boundary.** Provided in order to assist the Examining Authority in reviewing the adequacy of pre-application consultation, including the identification of prescribed consultees.

7.3 Volume 2: Draft Development Consent Order

7.3.1 This volume contains all the documents that outline the legal powers the Applicant is seeking.

- a. **Draft Development Consent Order.** Contains a list of the work the Applicant propose to do and the powers required that will enable the Applicant to construct, operate, and maintain the Proposed Development.
- b. **Explanatory Memorandum.** Explains and provides justification for the powers contained within the Draft Development Consent Order.
- c. **Consent and Agreements Position Statement.** This document lists other consents that the Applicant intends to obtain for the construction, operation, and maintenance of the Proposed Development.
- d. **DCO Validation Report.** Evidence that the draft DCO is error free and in the correct version of Statutory Instrument (SI) template.

7.4 Volume 3: Compulsory acquisition information

7.4.1 This volume contains provides necessary details regarding any compulsory acquisition required as a result of the Proposed Development.

- a. **Statement of Reasons.** Provides an explanation of why the Applicant may require legal powers to compulsory purchase land for the Proposed Development.
- b. **Book of Reference.** Identifies everyone who has a legal interest in the land affected by the Proposed Development. The Book of Reference (BoR) should be read in conjunction with the **Land Plans [TR020001/APP/4.03]** which identifies the location of the plots of land.
- c. **Funding Statement.** Explains how the Proposed Development, including any compulsory purchase acquisition, is proposed to be funded.

7.5 Volume 4: Plans

7.5.1 This volume contains the plans which show where and how the Applicant proposes to undertake its proposed works. Introductory sections are also provided for some plans to explain their purpose.

- a. **Location Plan.** This plan identifies the location of the Proposed Development in its wider context.
- b. **Scheme Layout Plans.** These plans show the layout of the Proposed Development.
- c. **Land Plans and Crown Land Plans.** These show the boundary within which the Applicant proposes to build the Proposed Development, the powers or rights to be exercised over the land and any Crown Land.
- d. **Works Plans.** These plans show the order limits within which the Proposed Development and works may be carried out and the extent of individual works.
- e. **Nature Conservation Plans.** As noted in **Table 1.2** above these plans are covered by the following **ES Figures [TR020001/APP/5.03]**:
 - i. **Figure 8.1** Ecological Statutory Designated Sites.
 - ii. **Figure 8.2** Ecological Non-statutory Designated Sites.
 - iii. **Figure 8.3** Ecological Constraints Plan.

These show land which is of particular environmental importance, including areas that are important for the protection of nature or are protected habitats.

- f. **Historic Environment Plans.** As noted in **Table 1.2** above these plans are covered by the following **ES Figures [TR020001/APP/5.03]**:
 - i. **Figure 10.1** Location of Designated Cultural Heritage Assets (Plan 1 of 2).
 - ii. **Figure 10.2** Location of Designated Cultural Heritage Assets (Plan 2 of 2).
 - iii. **Figure 10.3** Location of Non-Designated Cultural Heritage Assets.

These show historically important places such as listed buildings, scheduled monuments or archaeological sites.

- g. **Water Bodies in River Basin Management Plan.** As noted in **Table 1.2** above these plans are covered by the following **ES Figures [TR020001/APP/5.03]**:
- i. **Figure 20.2** Groundwater Features.
 - ii. **Figure 20.4** Water Framework Directive Water Bodies.
- h. **Streets, Right of Way, and Access Plans.** These plans show any new or altered means of access, stopping up of streets, roads and any diversions, extinguishment, or creation of rights of way.
- i. **General Arrangement Drawings.** Drawings necessary to describe the proposals for which development consent is sought, showing details of design, external appearance, and the preferred layout of buildings or structures, drainage, surface water management, means of vehicular and pedestrian access, any car parking to be provided, and means of landscaping.
- j. **Special Category Land Plans.** Plan identifying special category land and replacement land.
- k. **Airport Access Road and Luton DART Long Section Drawings.** Plans to illustrate what the levels of the Airport Access Road and the Luton DART might look like. Parameters for these are provided for in the **Draft Development Consent Order [TR020001/APP/2.01]**.
- l. **Airport Boundary Plan.** Plan identifying the airport boundary.

7.6 Volume 5: Environmental information

- a. **Environmental Statement.** The chapters contained in the ES are shown below.
- i. Chapter 1 – Introduction
 - ii. Chapter 2 – Site and Surroundings
 - iii. Chapter 3 – Alternative and Design Evolution
 - iv. Chapter 4 – The Proposed Development
 - v. Chapter 5 – Approach to the Assessment
 - vi. Chapter 6 – Agricultural Land Quality and Farm Holdings
 - vii. Chapter 7 – Air Quality
 - viii. Chapter 8 – Biodiversity
 - ix. Chapter 9 – Climate Change Resilience
 - x. Chapter 10 – Cultural Heritage
 - xi. Chapter 11 – Economics and Employment
 - xii. Chapter 12 – Greenhouse Gases
 - xiii. Chapter 13 – Health and Community
 - xiv. Chapter 14 – Landscape and Visual
 - xv. Chapter 15 – Major Accidents and Disasters
 - xvi. Chapter 16 – Noise and Vibration
 - xvii. Chapter 17 – Soils and Geology
 - xviii. Chapter 18 – Traffic and Transport
 - xix. Chapter 19 – Waste and Resources
 - xx. Chapter 20 – Water Resources and Flood Risk
 - xxi. Chapter 21 – In-combination and Cumulative Effects

- b. **Environmental Statement Appendices.** This contains background technical information referred to in the ES. Key ES appendices include, but are not limited to:
- i. **Appendix 4.2** Code of Construction Practice.
 - ii. **Appendix 7.5** Outline Operation Air Quality Plan.
 - iii. **Appendix 8.2** Outline Landscape and Biodiversity Management Plan.
 - iv. **Appendix 12.1** Outline Greenhouse Gas Action Plan.
 - v. **Appendix 16.2** Operational Noise Management (Explanatory Note).
 - vi. **Appendix 17.5** Outline Remediation Strategy for the Eaton Green Landfill.
 - vii. **Appendix 18.3** Outline Construction Traffic Management Plan.

Note that the following ES Appendices are not published as they contain sensitive information which, if disclosed, may adversely affect the protection of the environment to which the information relates:

- i. **Appendix 8.1** Ecology Baseline Report – Part B [TR020001/APP/5.02] (public version is also provided).
 - ii. **Appendix 8.2** Outline Landscape and Biodiversity Management Plan [TR020001/APP/5.02] (public version is also provided).
 - iii. **Appendix 8.7** Ecological Mitigation Strategy – Badger [TR020001/APP/5.02].
 - iv. **Appendix 8.9** Ecological Mitigation Strategy – Bird [TR020001/APP/5.02].
- c. **Environmental Statement Figures.** This contains all the diagrams and maps referred to in the ES.
- d. **Environmental Statement - Non-technical Summary.** A non-technical summary of the ES.
- e. **Scoping Opinion and Scoping Report.** The EIA scoping report for the Proposed Development was submitted to the Planning Inspectorate and is provided in **Appendix 1.1**. The Planning Inspectorate consulted on the EIA Scoping Report and published a Scoping Opinion which is provided in **Appendix 1.2**.
- f. **Statement of Statutory Nuisance.** Describes the relevant nuisances defined in the Environmental Protection Act 1990, as a result of the Proposed Development.
- g. **Flood Risk Assessment.** Provides the Applicant's assessment of risk of flooding.
- h. **Habitat Regulation Assessment No Significant Effects Report.** Produced to inform the Habitat Regulations Assessment (HRA) process for the Proposed Development.
- i. **Mitigation Route Map.** A sign-posting document to help both the Examining Authority and interested parties understand how and where mitigation relied on by the ES is to be secured.

7.7 Volume 6: Consultation report

7.7.1 This volume contains the Consultation Report for the Proposed Development.

- a. **Consultation Report.** Provides an account of the pre-application consultation undertaken on the project, including non-statutory consultation and the statutory consultation under Sections 42, 47 and 48 of the Planning Act 2008 (Ref 7.2).
- b. **Consultation Report Appendices.** Provides supporting documents for the Consultation Report. The Appendices also include 'due regard' tables for the 2019 and 2022 statutory consultations setting out the comments made during consultation and how the Applicant has had due regard of them.

7.8 Volume 7: Other reports

7.8.1 This volume includes additional documents that the Applicant has produced for the application submission.

- a. **Planning Statement.** This outlines the relevant local and national planning policies relating to the application for development consent.
- b. **Transport Assessment.** Assesses the potential transport impacts of the Proposed Development and measures proposed to mitigate this.
- c. **Design and Access Statement.** Sets out the relevant design policies and the site context and explains how these were considered in developing the design of the Proposed Development.
- d. **Need Case.** This document sets out the need for the Proposed Development, including the strategic economic case for aviation growth and future demand forecasts.
- e. **Employment and Training Strategy.** This document provides a strategy to ensure the generation of jobs and economic growth in Luton and the surrounding area.
- f. **Sustainability Statement.** Outlines the Applicant's approach to achieving a sustainable development.
- g. **Green Controlled Growth Explanatory Note.** Provides a narrative to explain the Green Controlled Growth approach.
- h. **Green Controlled Growth Framework.** Sets out the necessary processes and details of Limits and Thresholds that are required for the functioning of the Green Controlled Growth approach.
- i. **Design Principles.** Sets out the design principles that will inform the detailed design of the Proposed Development post consent.
- j. **Draft Compensation Policies, Measures and Community First.** This document sets out the compensation policies and measures proposed and also includes detail of Community First.

- k. **Equality Impact Assessment.** This document assesses the impact of the Proposed Development on protected characteristic groups and informs decision-making based on likely effects of these groups.
- l. **Surface Access Strategy.** This document presents the Applicant's vision and objectives for surface access and the priority areas and interventions that form the Applicant's approach.
- m. **Framework Travel Plan.** This document sets out the plan to achieve the vision and objectives within the Surface Access Strategy.

GLOSSARY AND ABBREVIATIONS

Term	Definition
ANPS	Airports National Policy Statement
APF	Aviation Policy Framework
BREEAM	Building Research Establishment Environmental Assessment Method
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EqIA	Equality Impact Assessment
ES	Environmental Assessment
FtF	Flightpath to the Future
GHG	Greenhouse Gas
GCG	Green Controlled Growth
GVA	Gross Value Added
HRA	Habitat Regulation Assessment
IEMA	Institute of Environmental Management and Assessment
LBC	Luton Borough Council
LLAOL	London Luton Airport Operations Limited, the current operators of London Luton Airport
Luton DART	Luton Direct Air to Rail Transit
Luton Rising	A trading name of London Luton Airport Limited, the owners of London Luton Airport
MBU	Beyond the Horizon - The future of UK aviation, making best use of existing runways
MMP	Materials Management Plan
mppa	Million passengers per annum
SI	Statutory Instrument
SoCG	Statements of Common Ground
Three Counties	Bedfordshire, Buckinghamshire, and Hertfordshire

References

Ref 1.1 Planning Act 2008, UK Public General Acts, 2008, c.29. Available at <https://www.legislation.gov.uk/ukpga/2008/29/contents> [Accessed 02/02/23]

Ref 3.1 Secretary of State for Transport (2013), Aviation Policy Framework

Ref 3.2 Department for Transport (June 2018) Airports National Policy Statement

Ref 3.3 Department for Transport (2018) Beyond the Horizon. The future of UK aviation: Making the best use of existing runways. DfT, London.

Ref 3.4 Department for Transport (2022) Flightpath to the Future: a strategic framework for the aviation sector, May 2022. Available at <https://www.gov.uk/government/publications/flightpath-to-the-future-a-strategic-framework-for-the-aviation-sector>. [Accessed 02/02/23]

Ref 3.5 Department for Transport (2022) Jet Zero Strategy, Delivering net zero aviation by 2050, July 2022.

Ref 4.1 Equality Act, 2010. Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Accessed 02/02/23]

Ref 5.1 Foreign & Commonwealth Office and Foreign, Commonwealth & Development Office. Global Britain: delivering on our international ambition. 2018.

Ref 5.2 Luton Council (2020) A town-wide vision for Luton 2020 – 2040: A place to thrive

Ref 6.1 IEMA (2016) EIA Guide to: Delivering Quality Development. Lincoln: IEMA

Ref 7.1 Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended)

Ref 7.2 Planning Act 2008, UK Public General Acts, 2008, c.29. Available at <https://www.legislation.gov.uk/ukpga/2008/29/contents> [Accessed 02/02/23]