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# London Luton Airport Expansion

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Volume 7 Other Documents  
**7.06 Sustainability Statement**

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**The Planning Act 2008**

**The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009**

**London Luton Airport Expansion Development Consent Order 202x**

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**7.06 SUSTAINABILITY STATEMENT**

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## EXECUTIVE SUMMARY

### Sustainability Statement

Airports enable people and businesses to connect, generate jobs and economic growth. Building on its unique position as a community airport owner, Luton Rising (a trading name of London Luton Airport Limited and henceforth 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 Luton and the Luton community and recognises its responsibility to the community, region and the planet to minimise any environmental impacts.

The purpose of this Sustainability Statement is to provide information about the sustainability measures and commitments which form part of the Proposed Development. This document also considers how the Proposed Development responds to relevant legislation, policy and guidance.

### Sustainability Principles

Independently from the Applicant's proposals to expand the airport, the Applicant has defined its own Sustainability (Ref ES.1) and Net Zero Strategies (NZS) (Ref ES.2) to position themselves as a sustainability leader in the aviation sector. The Luton Rising Sustainability Strategy is built around five pillars:

- a. protect and enhance the natural environment;
- b. deliver climate resilience and business continuity;
- c. lead the transition to Carbon Net Zero;
- d. become a national hub for green technology, finance and innovation; and
- e. be a place to thrive.

The Applicant intends to apply these strategies across all their corporate operation. As such, the scope of these strategies includes and extends beyond, the remit of the Proposed Development itself, to also cover ongoing and future operations at the airport and other Luton Rising assets.

This Sustainability Statement has therefore been structured around the above five pillars and presents how the Proposed Development will contribute to each of them.

### Commitments

Through the Proposed Development, the Applicant continues to be dedicated to the principles declared in the Sustainability Strategy (Ref ES.1) and NZS (Ref ES.2). This Sustainability Statement provides more information about the commitments which form part of the Proposed Development. These include those embedded as part of the **Green Controlled Growth (GCG) Framework [TR020001/APP/7.07]**, the **Environmental Statement (ES) [TR020001/APP/5.01]**, and the **Employment and Training Strategy (ETS) [TR020001/APP/7.05]**, among others.

Sustainability has been incorporated through all aspects of design, construction, and operations. The proposed measures will be some of the most far-reaching commitments for minimising potential environmental impacts ever put forward by a UK airport.

The environmental commitments cover the operation of the airport and the overall Sustainability Strategy (Ref ES.1), including non-airport assets.

Most notably, these commitments include:

- f. Reducing the carbon footprint of the Proposed Development through construction and operations, including achieving zero emission airport operations and carbon neutral surface access by 2040.
- g. Managing air quality levels, resources and waste, water quality and noise and vibration, enhancing local biodiversity, and delivering good land quality.
- h. Future-proofing airport assets for climate resilience in collaboration with the airport operator.
- i. Encouraging and supporting training and upskilling to prepare residents for new jobs and ensuring these jobs are inclusive of diverse backgrounds.

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# 1 INTRODUCTION

## 1.1 The Proposed Development

1.1.1 Luton Rising (a trading name of London Luton Airport Limited and henceforth 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 Luton and the Luton community.

1.1.2 The Applicant is proposing to expand London Luton Airport (the airport) by submitting an application for development consent for the Proposed Development, which builds on the current operational airport, with the construction of a new passenger terminal and additional aircraft stands on land located to the north east of the runway.

1.1.3 This will take the overall passenger capacity from 18 million passengers per annum (mppa) to 32 mppa.

1.1.4 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.

1.1.5 Key elements of the Proposed Development include:

- a. extension and remodelling of the existing passenger terminal (Terminal 1) to increase the capacity;
- b. new passenger terminal building and boarding piers (Terminal 2);
- c. earthworks to create an extension to the current airfield platform, 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 achievement of zero emission airport operations and carbon neutral surface access by 2040<sup>1</sup>, with interventions to support carbon neutrality being delivered sooner; including facilities for greater public

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<sup>1</sup> 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.

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.

- 1.1.6 A full project description is provided in **Chapter 4** of the **Environmental Statement** (the ES) [**TR020001/APP/5.01**].
- 1.1.7 On 1 December 2021, the local planning authority (Luton Borough Council) resolved to grant permission for the current airport operator, London Luton Airport Operations Limited (LLAOL), to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa. 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 concluded on Friday 18<sup>th</sup> November 2022. At the time of submission of the application for development consent, the outcome of the inquiry is still unknown. All assessment work to date has been undertaken using a “baseline” of 18 mppa. Nonetheless, in anticipation of LLAOL’s 19 mppa planning application, the preliminary environmental assessments included sensitivity analysis of the implications of the permitted cap increasing. As a result, the Applicant believes that the environmental assessments are sufficiently representative of the likely significant effects of expansion, whether the baseline is 18 mppa or 19 mppa. Where the change of the baseline does affect an assessment topic, in most cases it means that the “core” assessments (using an 18 mppa baseline) report a marginally greater change than would be the case with a 19 mppa baseline.
- 1.1.8 As part of the EIA process, the Applicant has continued to assess the likely significant environmental effects resulting from the future construction and operation of the airport. This included keeping a watching brief on the inquiry regarding the called-in application as well as consideration of feedback received at Statutory Consultation 2022 to see if this required the Applicant to make a change to its assessments and proposals. The findings of this assessment are presented in the ES submitted with the application for development consent.

## **1.2 Purpose of the Sustainability Statement**

- 1.2.1 This Sustainability Statement (SS) provides information about the sustainability proposals incorporated into the Proposed Development and has been informed by feedback received in response to the 2022 Statutory Consultation, as well as earlier consultations.
- 1.2.2 This SS considers how the Proposed Development addresses policy and legislation relevant to sustainability (see sections 2 and 5) and outlines the Applicant’s commitments around sustainability in the context of the Proposed Development, which have themselves been defined in line with the Applicant’s own corporate Sustainability Strategy (Ref ES.1) and Net Zero Strategy (NZS) (2022) (Ref ES.2).
- 1.2.3 This SS is therefore structured around the five key strategic objectives which are central to the Applicant’s corporate strategy (Ref ES.1):

- a. protect and enhance the natural environment;
- b. deliver climate resilience and business continuity;
- c. leading the transition to Carbon Net Zero;
- d. become a national hub for green technology, finance and innovation;  
and
- e. be a place to thrive.

1.2.4 For each objective, this SS considers how the Proposed Development would contribute to its achievement. To do this, this SS draws on and signposts to the **ES [TR020001/APP/5.01]** and the proposed sustainability commitments contained throughout other application documents.

1.2.5 Noting there is no statutory requirement to produce a SS as part of an application for development consent, this document is being provided on a voluntary basis. The purpose of the SS is to make it easier for people to understand how the Proposed Development will address matters of sustainability, and in recognition that it is considered best practice.

1.2.6 On this basis, it should be noted that the SS is not proposed to be a control document to be legally secured through the Development Consent Order (DCO). The purpose of the SS is solely to signpost the reader to the suite of sustainability commitments within the application for development consent.



## 2 RELEVANT LEGISLATION, POLICY, AND GUIDANCE

### 2.1 Introduction

- 2.1.1 This section sets out national and local policy and legislation relevant to the sustainability proposals for the Proposed Development and which have been taken account of in developing the Applicant's corporate Sustainability Strategy (Ref ES.1) and NZS (Ref ES.2).
- 2.1.2 Reference should also be had to the policy and legislation set out in the relevant chapters of the **ES [TR020001/APP/5.01]**:
- a. Agricultural Land Quality and Farm Holdings (Chapter 6);
  - b. Air Quality (Chapter 7);
  - c. Biodiversity (Chapter 8);
  - d. Climate Change Resilience (Chapter 9);
  - e. Cultural Heritage (Chapter 10);
  - f. Economics and Employment (Chapter 11)
  - g. Greenhouse Gases (Chapter 12);
  - h. Health and Community (Chapter 13);
  - i. Landscape and Visual (Chapter 14);
  - j. Major Accidents and Disasters (Chapter 15);
  - k. Noise and Vibration (Chapter 16);
  - l. Soils and Geology (Chapter 17);
  - m. Traffic and Transport (Chapter 18);
  - n. Waste and Resources (Chapter 19); and
  - o. Water Resources (Chapter 20).
- 2.1.3 A **Planning Statement [TR020001/APP/7.01]** has also been included as part of the application for development consent, which provides a detailed policy review and appraisal of how the Proposed Development as a whole complies with relevant planning policy.

- 2.1.4 A summary of how national, regional, and local policy relate to the sustainability proposals embedded within the Proposed Development is set out in the concluding Section 5, following the thematic assessment of the sustainability proposals against the Sustainability Strategy (Ref ES.1) and NZS (Ref ES.2) in Section 4.

### 2.2 Legislation

#### ***Environment Act 2021***

- 2.2.1 The Environment Act 2021 (Ref 2.1), which was granted Royal Assent in November 2021, sets out requirements for:

- a. long-term targets to improve air quality, biodiversity, water, and waste reduction and resource efficiency;
- b. a target on ambient PM2.5 concentrations;
- c. a target to halt the decline of nature by 2030;
- d. an environmental improvement plan to be produced, including annual reports on implementation and interim targets;
- e. a cycle of environmental monitoring and reporting;
- f. environmental principles to be embedded in domestic policy making; and
- g. the creation of an Office for Environmental Protection to uphold environmental law.

2.2.2 The Act also enshrines in law the 10% biodiversity net gain principle for new developments. In the case of Nationally Significant Infrastructure Projects (NSIPs) such as the Proposed Development however, it is currently anticipated that this requirement will only apply to NSIPs accepted for examination from November 2025.

### ***Climate Change Act 2008***

2.2.3 The Climate Change Act 2008 (Ref 2.2), as amended in October 2019, sets a legal framework for the UK to cut GHG emissions to 100% below 1990 levels by 2050. It requires the government to set binding, five-yearly carbon budgets based on the latest science, and in light of economic circumstances. This long-term approach to cutting emissions will deliver results at the lowest possible cost.

2.2.4 The Act also established the Committee on Climate Change (CCC) to ensure that emissions targets are evidence-based and independently assessed. In addition, the Act requires the government to assess the risks and opportunities from climate change for the UK, and to adapt to them. The CCC's Adaptation Committee advises on these climate change risks and assesses progress towards tackling them.

## **2.3 National Policy**

2.3.1 The following subsections provide an overview of the key national policy documents of relevance to the Proposed Development. These are set out chronologically by publication date.

### ***Noise Policy Statement for England – 2010***

2.3.2 The Government's noise policy (Ref 2.3) (also referenced at paragraph 5.68 of the Airports National Policy Statement (Ref 2.4)) defines the following aims (emphasis added):

*“Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:*

- *avoid significant adverse impacts on health and quality of life;*
- *mitigate and minimise adverse impacts on health and quality of life; and*
- *where possible, contribute to the improvement of health and quality of life.”*

### ***Aviation Policy Framework (APF) – March 2013***

2.3.3 The Aviation Policy Framework (APF) (Ref 2.5) sets out the government’s policy to allow the aviation sector to continue to make a significant contribution to economic growth across the country. The APF is a high-level strategy setting out the government’s overall objectives for aviation, and the policies they will use to achieve these objectives. It states support for growth in the aviation sector, which is a major contributor to the national economy. The APF sets out a framework which aims to maintain a balance between the benefits of aviation and its costs, particularly associated with noise and climate change (see sections 4.2 and 4.4 respectively).

2.3.4 In relation to this, the APF sets out the following objectives:

- a. ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions;
- b. limit and where possible reduce the number of people in the UK significantly affected by aircraft noise; and
- c. ensure appropriate health protection by focusing on meeting relevant legal obligations.

### ***National Policy Statement for National Networks – December 2014***

2.3.5 The National Policy Statement for National Networks (NPSNN) (Ref 2.6), published in December 2014, sets out the need for, and Government’s policies to deliver NSIPs on the national road and rail networks in England. It provides planning guidance for promoters of NSIPs on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the SoS for such projects.

2.3.6 There are no elements of the Proposed Development on the national road or rail network that would be classified as a NSIP in their own right. However, the NPSNN remains an important and relevant consideration, particularly as works are proposed on the Strategic Road Network (SRN) at Junction 10 of the M1 as part of the Proposed Development.

2.3.7 The NPSNN provides policy advice across a broad range of topics, including carbon, noise, air quality, biodiversity and water, amongst others.

### ***Policy Paper: ‘A Green Future: Our 25 Year Plan to Improve the Environment’ – January 2018***

2.3.8 The Government’s 25 year Environment Plan (Ref 2.7) sets out its goals for improving the environment over the period. It details how the Government will

work with communities and businesses to mitigate and adapt to climate change, deliver cleaner air and water in cities and rural landscapes, protect threatened species, and provide richer wildlife habitats. The Plan also calls for an approach to agriculture, forestry, land use and fishing that puts environmental concerns at the forefront.

2.3.9 The Plan sets out a number of policies under each of the following headings, including:

- a. **Clean air** – meeting legally binding targets to reduce emissions and maintaining the continuous improvement by building on existing good practice;
- b. **Clean and plentiful water** – reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per River Basin Management Plans;
- c. **Thriving plants and wildlife** – making sure populations of key species are sustainable with appropriate age structures;
- d. **Reducing the risks of harm from environmental hazards** – reducing the risk of harm to people, the environment and the economy from natural hazards including flooding through ensuring that decisions on land use reflect the level of current and future flood risk;
- e. **Using resources from nature more sustainably and efficiently** – ensuring that resources from nature are used more sustainably and efficiently, and maximising the value and benefits from the resources;
- f. **Enhancing beauty, heritage, and engagement with the natural environment** – safeguarding and enhancing the beauty of the natural scenery and improving its environmental value while being sensitive to considerations of its heritage;
- g. **Mitigating and adapting to climate change** – continuing to cut GHG emissions;
- h. **Minimising waste** – reusing materials as much as possible and managing materials at the end of their life as well as significantly reducing, and where possible preventing, all kinds of marine plastic pollution;
- i. **Managing exposure to chemicals**<sup>2</sup> – ensuring that chemicals are safely used and managed, and that the levels of harmful chemicals entering the environment are significantly reduced; and
- j. **Enhancing biosecurity**<sup>1</sup> – supporting the government in ensuring strong biosecurity protection at the borders, drawing on the opportunities leaving the EU provides.

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<sup>2</sup> In Defra's 2019 Measuring environmental change: outcome indicator framework for the 25 Year Environment Plan, Chemicals and Biosecurity are monitored under Theme H which also includes Noise.

### ***Airports National Policy Statement (ANPS) – June 2018***

- 2.3.10 The 'Airports National Policy Statement: new runway capacity and infrastructure at airports in the south-east of England' (the ANPS) (Ref 2.4) was designated on 26 June 2018, providing a policy framework for new runway capacity and infrastructure in the south east of England. The ANPS has 'effect' only in relation to the delivery of additional airport capacity through the provision of a Northwest Runway at Heathrow Airport.
- 2.3.11 However, there is general provision in the ANPS that it will be "an important and relevant consideration in respect of applications for [...] airport infrastructure in London and the Southeast of England". The ANPS will, therefore, be an important and relevant consideration in the determination of the application for development consent for the Proposed Development.
- 2.3.12 The ANPS provides policy advice across a broad range of topics, including carbon, noise, air quality, surface access, biodiversity and water, amongst others. In respect of each topic, the ANPS outlines principles to be considered and applied as appropriate in assessing the effects of the Proposed Development, as well as expectations in respect of how and the extent to which any harm could or should be mitigated.

### ***Beyond the Horizon: The future of UK aviation – Making best use (MBU) of existing runways – June 2018***

- 2.3.13 This policy document (Ref 2.8), which was published in June 2018 alongside the ANPS, sets out the specific principles applying to the government's support for airports making best of their existing runways across the whole of the UK. Paragraph 1.29 concludes:

*"Therefore the government is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have negative as well as positive local impacts, including on noise levels. We therefore consider that any proposals should be judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations. This policy statement does not prejudice the decision of those authorities who will be required to give proper consideration to such applications. It instead leaves it up to local, rather than national government, to consider each case on its merits."*

### ***Aviation 2050 – the future of UK aviation – December 2018***

- 2.3.14 As part of the development of its new aviation strategy, the government published a Green Paper 'Aviation 2050 – the future of UK aviation' (Ref 2.9) for consultation in December 2018 outlining its proposals for a new aviation strategy. The core objectives underpinning Aviation 2050 were:
- a. help the aviation industry work for its customers;
  - b. ensure a safe and secure way to travel;

- c. build a global and connected Britain;
- d. encourage competitive markets;
- e. support growth while tackling environmental impacts; and
- f. develop innovation, technology and skills.

2.3.15 This provides the context for why government supports the growth of aviation as part of its sustainable development strategy.

***Flightpath to the Future – May 2022***

2.3.16 The most recent statement of government aviation policy is ‘Flightpath to Future’ (FttF) (Ref 2.10). The purpose of this strategy is to set out “*a strategic framework for aviation over the next ten years*”. In particular, FttF sets out to address the challenges faced by the industry following the Covid-19 pandemic and taking into account the effects of Brexit, with the key aims being to secure:

*“A future where aviation remains of huge strategic importance to the country post-Brexit allowing tourism, business and trade to thrive. A future where UK aviation becomes synonymous with sustainability, and part of the solution to climate change. And a future where the UK consolidates its position as one of the world’s most important aviation hubs.”*

2.3.17 Specifically, the government confirms its support for airport expansion and the relevance of earlier policy statements in respect of airport growth and development.:

*“That means supporting airport expansion where it’s justified, to boost our global connectivity and level up the UK.”*

*“Airports have a key role to play in boosting our global connectivity and we continue to be supportive of sustainable airport growth. Our existing planning frameworks for airport growth provide a robust and balanced framework for airports that want to grow within our strict environmental criteria.”*

2.3.18 Whilst FttF represents the most recent statement of government aviation policy, it is intended primarily as a 10-year recovery strategy and cross references other policy documents such as the ANPS (Ref 2.4), Making Best Use (MBU) policy (Ref 2.8), the Aviation 2050 Green Paper (Ref 2.9) and the Jet Zero (Ref 2.11) consultation as also containing relevant policy, in particular making reference to Aviation 2050 for the relevant noise policy framework. Hence, it is clear that FttF does not supersede existing policy but brings it up to date.

2.3.19 FttF has provided confirmation that the principal policy context for this application is the MBU policy (Ref 2.8), which is addressed above.

***Jet Zero Strategy: Delivering net zero aviation by 2050 – July 2022***

2.3.20 For the aviation sector, FttF (published May 2022) (Ref 2.10) set out a strategic framework for the aviation sector that supports the Department for Transport’s vision for a modern, innovative and efficient sector over the next 10 years,



including putting the sector on course to achieve net zero GHG emissions by 2050.

- 2.3.21 This was followed by a specific net zero strategy for aviation, called Jet Zero (Ref 2.11), published in July 2022, following previous consultations on the approach and principles to reach net zero aviation by 2050. Supporting this strategy, the government has established the Jet Zero Council. In 2020 the Government introduced legislation to give effect the UK Emissions Trading Scheme (UK ETS), as a replacement for the UK's previous participation in the EU ETS, and in 2021 it introduced legislation to bring the UK within the ICAO Carbon Offsetting and Reduction Scheme for International Aviation (CORSA).
- 2.3.22 A number of commitments are presented in the Jet Zero Strategy with direct relevance to the Proposed Development including:
- a. A commitment to achieving a 'High Ambition Scenario', whereby emissions from aircraft will be decarbonised by 2050 through a series of interventions including the increased uptake of sustainable aviation fuels (SAFs), aircraft efficiencies, demand management, and zero emissions aircraft.
  - b. A commitment for UK airport operations to be zero emissions by 2040 (noting that further consultation will be undertaken to define this).
  - c. A commitment to accelerate work to understand non-carbon dioxide (CO<sub>2</sub>) impacts from aviation.
- 2.3.23 Ahead of this Strategy, the government had already taken steps to include international aviation and shipping within the Sixth Carbon Budget over the period 2033 to 2037, to ensure that carbon emissions are controlled within the required trajectory to achieve net zero carbon emissions across the UK economy by 2050.
- 2.3.24 Government commitments presented in the Jet Zero Strategy have been taken into consideration in the GHG emissions assessments (provided in **Chapter 12** of the **ES [TR020001/APP/5.01]**) for aircraft and ground operations and the proposed **GCG Framework [TR020001/APP/7.07]**.

## 2.4 Local Policy and Guidance

### *Luton Local Plan (2011 – 2031) – adopted November 2017*

- 2.4.1 The Luton Local Plan 2011-2031 (Ref 2.12) sets out the vision, objectives, and spatial planning strategy for the whole of Luton Borough Council's (LBC) administrative area, for the period up to 2031.
- 2.4.2 The following policies set out some of the key sustainability issues considered in relation to the Proposed Development:
- a. **LLP1 – Presumption in Favour of Sustainable Development:** The Council will seek to encourage growth and sustainable development and manage change so as to create a network of connected, sustainable, high quality, locally distinctive and healthy places.

- b. **LLP6 – London Luton Airport Strategic Allocation** (see section 4.5): The allocation serves the strategic role of the airport and associated growth of business and industry, including aviation engineering, distribution and service sectors that are important for Luton, the sub-regional economy, and for regenerating the wider conurbation.
- c. **LLP13 – Economic Strategy** (see section 4.6): sets out the economic strategy for delivering jobs and strategic allocations.
- d. **LLP14 – Employment Areas** (see sections 4.5 and 4.6): This policy covers Category A (existing employment areas), and Category B (marginal employment areas intended for redevelopment, extensions and intensification) and existing unidentified employment sites.
- e. **LLP27 – Open Space and Natural Greenspace** (see section 4.2): Explains that the Council will work with developers, landowners, and stakeholders and support proposals that safeguard and enhance existing networks of open space (including the district and neighbourhood parks identified in the Policies Map (Ref 2.13)) and establish new green infrastructure within the borough in accordance with standards established in the Green Infrastructure (Ref 2.14), Nature Conservation (Ref 2.15) and Greenspace Strategies (including for recreation and biodiversity) (Ref 2.16).
- f. **LLP28 – Biodiversity and Natural Conservation** (see section 4.2): The Council will work with partner organisations to positively assess, manage, and designate sites and ecological networks including giving support to development proposals that add to the net stock of wildlife habitats or where they help to deliver a net gain in the conservation and enhancement of such sites.
- g. **LLP29 – Geological Conservation** (see section 4.2): Development proposals will be supported where they protect, conserve, or enhance the character, setting, and natural beauty of national and local landscape areas.
- h. **LLP31 – Sustainable Transport Strategy** (see sections 4.2 and 4.4): The strategy for sustainable transport in Luton is based on the vision for the Local Transport Plan 2011-2026 (Ref 2.17), which is to ensure that an integrated, safe, accessible, and more sustainable transport system supports the economic regeneration and prosperity of the town.
- i. **LLP36 – Flood Risk** (see section 4.3): The Council will encourage development to reduce the overall flood risk, where possible, through the design and layout of schemes that replace flood plain and enhance natural forms of drainage (this could include, but is not limited to, floodplain creation, green roofs, surface water storage, removing culverts, and barriers to flow).
- j. **LLP37 – Climate Change, Carbon and Waste reduction and Sustainable Energy** (see sections 4.2, 4.3 and 4.4): The Council will support development proposals that contribute towards mitigation,



and adaptation to climate change through energy use reduction, efficiency, and renewable, and decentralised energy. The Council also encourage an overall reduction in the amount of waste generated.

- k. **LLP38 – Pollution and Contamination** (see section 4.2): This policy covers chemical, biological, and radiological contamination and the effects of noise, vibration, light, heat, fluid leakage, dust, fumes, smoke, gaseous emissions, odour, explosion, litter, and pests.

### ***Luton Borough Council Climate Change Action Plan – April 2021***

- 2.4.3 The LBC Climate Change Action Plan (Ref 2.18) outlines an organisational aim to reach net zero carbon by 2040, in advance of the national target in 2050, and a target for the Borough to be a carbon neutral town by 2040. The Plan sets the pathway for LBC to work with key departments (including the council estate, transport team, waste team, and property and construction teams) to meet the organisational commitment to achieving net zero.
- 2.4.4 Although the Climate Change Action Plan does not specifically mention aviation, the airport is described as a partner in some of the targets and the Plan indicates that the existing airport operator, LLAOL, will work with LBC on ways to support this aim.

### ***Luton Local Transport Plan 2011-2026 – March 2011***

- 2.4.5 LBC is required by the Transport Act 2000 (Ref 2.19) and the Transport Act 2008 (Ref 2.20) to produce a Local Transport Plan. The 2011 Luton Local Transport Plan (Ref 2.17) represents the third Local Transport Plan (LTP3) and has been prepared with extensive liaison with Central Bedfordshire Council to deliver strategic transport infrastructure associated with the growth of Luton and southern Central Bedfordshire which, whilst located within their area, will deliver transport benefits throughout the whole Luton-Dunstable-Houghton Regis conurbation.
- 2.4.6 The Plan is underpinned by the long-term transport vision for 2026:

*“To make Luton a safer and healthier place in which to live, work, learn and have fun, we will provide an integrated, safe, accessible and more sustainable transport system which supports the economic regeneration and prosperity of the conurbation and the planned growth of the area whilst reducing unnecessary car use and CO2 emissions, enhances the environment and generally improves the health and quality of life of the community.”*

To achieve this vision, the following aims are outlined:

- a. **Generate continued employment and prosperity** by improving access to employment and skills/training opportunities for local residents, and by improving existing and providing new transport infrastructure and other measures that support local businesses, climate change objectives and the diversification of the local economy.

- b. **Create and preserve an attractive environment and pleasant living conditions** by promoting a quality built environment together with improving the condition of green space in the conurbation and conserving/enhancing the surrounding Chilterns Area of Outstanding Natural Beauty (AONB) to encourage greater access by walking and cycling.
- c. **Promote equitable opportunities and access to services for all members of the community** by improving choices of modes of transport and the design of transport facilities for non-motorised users and mobility-impaired and other vulnerable people.
- d. **Promote the development of Luton Town Centre** as a sub-regional centre and improve the vitality and viability of other district centres.
- e. **Give people the opportunity to choose more sustainable travel habits** by implementing transport schemes and travel planning initiatives to maximise the role of public transport, walking and cycling, thus reducing vehicular emissions and increasing physical activity.
- f. **Support Luton's growth as an international gateway** in the context of both the growth of London Luton Airport and ease of access to the new Channel Tunnel Rail Link terminus at St Pancras.
- g. **Lay the foundations for future expansion by ensuring accessibility** (by more sustainable transport modes) between the new residential developments, existing and proposed employment areas, the town centres, and existing and new community facilities to serve the growth area<sup>3</sup>.

***Luton Borough Council Supplementary Planning Guidance (SPG) - Designing for Sustainability – adopted January 2003***

2.4.7 Prepared for developers, planning officers and building control to apply sustainable principles in new developments, this SPG is intended to be a best practice guide for designing sustainable developments. As noted on the LBC website however, under the new planning system this SPG will be replaced with a supplementary planning document (SPD) for the growth area which reflects more up to date sustainable development principles, construction methods and materials and in particular renewable energy and reducing the carbon footprint of developments.

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<sup>3</sup> The growth area covers Luton and the southern part of Central Bedfordshire. Based on the scale of growth and development allocated in Luton and southern Central Bedfordshire, the area is considered a Key Centre for Development and Change, and the Regional Economic Strategy also identifies the Milton Keynes / South Midlands area as an 'Engine of Growth'. The Luton Dunstable Houghton Regis conurbation is also a Priority Area for Economic Regeneration and a regional transport node, and Luton is identified as a sub-regional centre. Effective and integrated transport and spatial planning is a key corporate priority for both LBC and Central Bedfordshire Council. To that end a Joint Committee, set up by the two Councils, has been responsible for developing the long-term strategy for the growth area.

### ***Central Bedfordshire Local Plan 2015-2035 – adopted July 2021)***

- 2.4.8 The Central Bedfordshire Local Plan (2015 – 2035) (Ref 2.21) is a key local policy document which sets out how and where new homes, jobs and infrastructure will be delivered in Central Bedfordshire. The Plan outlines the strategy for ensuring that growth is “*delivered in the right place*” and is of the “*right character and quality*”.
- 2.4.9 The Plan contains a range of policies which are of relevance to the Proposed Development and its sustainability commitments, grouped within the following categories:
- a. **Employment and Economy:** with five policies on matters ranging from the rural and visitor economy to employment sites;
  - b. **Transport:** with a total of six policies covering matters including the mitigation of transport impacts on the network, parking and ultra low emissions vehicles;
  - c. **Environmental Enhancement:** made up of 14 policies covering green infrastructure, biodiversity enhancement, nature conservation, trees, woodlands and hedgerows, as well as a number of policies focused on specific locations (e.g. Chilterns AONB);
  - d. **Climate Change and Sustainability:** with a total of eight policies focused on a range of matters including climate change, sustainable energy development, flood risk, sustainable drainage, water resources and pollution.

### ***North Hertfordshire Local Plan 2011-2031 – adopted November 2022***

- 2.4.10 The latest version of the North Hertfordshire Local Plan 2011-2031 (Ref 2.22) was adopted on Tuesday 8 November 2022 and replaces the saved policies of the District Plan Second Review with Alterations (Ref 2.23). The Plan sets out how and where new homes, jobs and infrastructure will be delivered in the district.
- 2.4.11 The Plan contains a range of policies which are of relevance to the Proposed Development and its sustainability commitments:
- a. **Policy SP1: Sustainable development in North Hertfordshire:** Supports the principles of sustainable development within North Hertfordshire. The policy informs the determination of planning applications within the district on the basis they provide appropriate homes, jobs and facilities; create high-quality developments allowing healthy lifestyle choices; develop necessary infrastructure; protect key elements of the natural and built environment; and secure required mitigation to reduce the impacts development, including on climate change.
  - b. **Policy SP3: Employment:** Proactively encourages sustainable economic growth, supporting new and existing businesses, and seeking to build on the district’s strengths, location and offer.

- c. **Policy SP5: Countryside and Green Belt:** Supports the principles of the Green Belt and recognise the intrinsic value of the countryside. The policy also supports the removal of land from the Green Belt under certain circumstances, including strategic development.
- d. **Policy SP6: Sustainable transport:** Delivers accessibility improvements and promotes the use of sustainable transport modes insofar as reasonable and practicable.
- e. **Policy SP9: Design and Sustainability:** Considers the importance of good design as a key aspect of sustainable development.
- f. **Policy SP10: Healthy Communities:** Seeks to provide and maintain healthy, inclusive communities for North Hertfordshire residents.
- g. **Policy SP11: Natural resources and sustainability:** Seeks to meet the challenges of climate change and flooding.
- h. **Policy SP12: Green infrastructure, landscape and biodiversity:** Seeks to accommodate significant growth during the Plan period whilst ensuring the natural environment is protected and enhanced.

2.4.12 In addition, '**Policy IMR2: Local plan early review**', provides for North Hertfordshire Council to undertake an early review of the Local Plan 2011-2031 to determine whether it needs to be updated either in whole or in part. This policy makes reference to working with other relevant authorities to understand, and holistically plan for, any long-term strategic infrastructure requirements arising from future growth, and specifically mentions any proposals to expand the airport beyond the limits of its current planning permission.

#### ***Dacorum Borough Council Core Strategy 2006 - 2031***

2.4.13 The Dacorum Borough Council Core Strategy (DBCCS) (Ref 2.24) aims to anticipate and manage change in Dacorum out to 2031. The document highlights the importance of balancing the need for new development and infrastructure against the need to maintain the environmental assets and unique character of the borough. It is also one of the key tools to help maximise and coordinate new investment in Dacorum and help promote economic regeneration.

2.4.14 The central themes to be addressed over the plan period are to: strengthen economic prosperity, provide homes and community services; and appropriately manage the natural environment.

#### ***Hertfordshire Local Transport Plan 2018 - 2031***

2.4.15 This is the fourth Local Transport Plan (LTP) (Ref 2.25) produced by Hertfordshire County Council (HCC) and published in May 2018. The document sets out how transport can help deliver a positive future vision for Hertfordshire by having a major input into wider policies such as economic growth, meeting housing needs, improving public health and reducing environmental damage whilst also providing for safe and efficient travel. The LTP also considers how future planning decisions and emerging technology might affect the way that transport needs to be provided for in the longer term.

***Hertfordshire Local Waste Plan / Waste Development Framework  
2011-2026***

- 2.4.16 This document (Ref 2.26), adopted by HCC in November 2012, sets out a spatial vision and strategic objectives for waste planning in Hertfordshire. It also contains the policies needed to implement these objectives and make decisions on waste planning applications.

### 3 OVERVIEW OF RELEVANT DOCUMENTATION

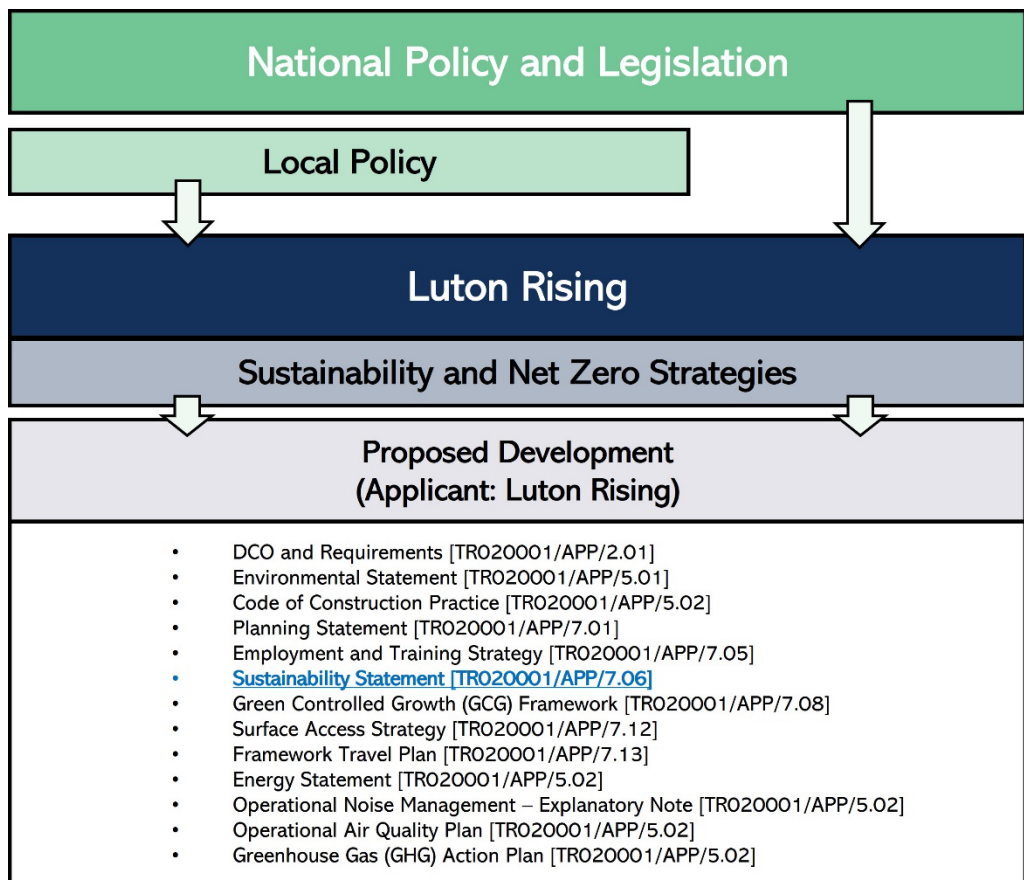
#### 3.1 Introduction

3.1.1 The Applicant’s sustainability commitments for the Proposed Development have been drawn from and defined in line with their own corporate Sustainability Strategy (Ref ES.1) and NZS (Ref ES.2) and developed in line with the legislation and policy outlined in Section 2.

3.1.2 As the current operator of the airport, LLAOL has also published a range of sustainability commitments and targets which are currently under review and being updated. LLAOL will continue to operate the airport in accordance with any agreements and requirements of the DCO. The application for development consent does not, however, seek to secure LLAOL’s own sustainability commitments, as it is assumed their implementation will progress independently.

3.1.3 **Figure 3.1**, below, provides an overview of how the sustainability proposals for the Proposed Development tie into Luton Rising's broader sustainability framework. LLAOL's sustainability commitments are additional to this. The remainder of the chapter provides further information in relation to the Sustainability Strategy and NZS.

Figure 3.1: Luton Rising Sustainability Framework





## 3.2 Luton Rising Sustainability Strategy and Net Zero Strategy

### *Overview of the Luton Rising Sustainability Strategy*

- 3.2.1 The Luton Rising Sustainability Strategy (Ref ES.1) sets out Luton Rising's corporate strategy for addressing sustainability issues across its entire operation. As such, the scope of the Luton Rising Sustainability Strategy naturally includes, but also extends beyond, the scope of the Proposed Development, to cover ongoing and future operations at the airport, as well as other Luton Rising assets.
- 3.2.2 The Sustainability Strategy outlines a comprehensive framework for the future development and operation of the airport to take place in a way that meets the expectations of LBC, Luton Rising's sole shareholder. It also confirms the Applicant's aspiration to be a sustainability leader, building on their unique position as a community airport owner, and acting as a key driver for the realisation of LBC's 2020-2040 vision for Luton to be a place to thrive, a carbon neutral town, and a place where no-one needs to live in poverty.
- 3.2.3 The Sustainability Strategy vision is underpinned by five strategic objectives to support the creation of community value:
- a. **Protect and enhance the natural environment:** Securing a positive impact for stakeholders by managing the air quality levels, resources and waste, water quality, and noise and vibration, enhancing the local biodiversity and delivering good land quality (see section 4.2, below).
  - b. **Deliver climate resilience and business continuity:** Collaborate with the airport operator and relevant stakeholders to make sure appropriate measures are implemented to future-proof assets and enhance business continuity capability, preserving value for customers and stakeholders (see section 4.3, below).
  - c. **Lead the transition to carbon net zero:** Support LBC in achieving its carbon neutral town target by 2040 through minimising emissions associated with construction activities, committing to airport ground operations being net zero by 2040, achieving carbon neutrality for surface access by 2040, and committing to playing a part in the delivery of the government's ambition of net zero aviation through supply of SAFs and support for electric aircraft. The NZS (see an overview of this strategy in the following subsection) provides further detail on the Applicant's approach (see section 4.4).
  - d. **Become a national hub for green technology, finance and innovation:** Building on existing partnerships and using the airport's geographic location and unique role as a community airport, Luton Rising aims to become a catalyst for sustainable development and enhance the economic attractiveness of Luton and the surrounding area (see section 4.5).
  - e. **Be a place to thrive:** Secure a positive impact for stakeholders by enhancing the health and wellbeing of the local communities, fostering diversity and inclusion across Luton Rising's activities and

laying the foundations for decades of economic growth. This will lead to job creation and enable the community to thrive (see section 4.6).

3.2.4 Reference should be had to Section 4 of this SS for further detail on how the Proposed Development contributes to achieving these sustainability objectives.

3.2.5 To enable the realisation of the strategic objectives, the following principles are identified within the Luton Rising Sustainability Strategy:

- a. **Continually engage, collaborate and create partnerships with suppliers and stakeholders:** Delivering continual improvement of Luton Rising’s sustainability programmes by frequently reflecting on performance and communicating with suppliers and stakeholders, and creating partnerships to drive effective positive change.
- b. **Provide adequate tools and resources to develop, implement and maintain initiatives to meet targets:** Providing the tools as well as human and financial resources required to deliver on the strategic objectives, joining forces with stakeholders and partners, including through innovative and sustainable finance opportunities.
- c. **Deliver continual improvement through good governance:** Implementing robust governance processes to foster innovation and deliver on the strategic objectives through clear ownership and accountability by monitoring, reporting, publishing, and engaging with relevant stakeholders.

### ***Overview of the Luton Rising Net Zero Strategy***

3.2.6 In January 2020, LBC declared a “climate emergency” and set a target to become a carbon neutral town by 2040 (Ref 3.1). As Luton Rising’s sole shareholder, LBC’s 2040 target has been integrated into the Luton Rising NZS (Ref ES.2). The NZS outlines the aspiration for the airport’s ground operations to become net zero by 2040.

3.2.7 The NZS outlines four key objectives:

- a. adopting a whole-life emissions approach and circular economy principles for construction;
- b. decarbonising energy used in operation;
- c. promoting the number of trips to the Luton Rising’s properties using active and sustainable transport modes; and
- d. promoting use of low emissions aircraft and decarbonising ground operations.

3.2.8 Reference should be had to section 4.4 of this SS for further detail on the measures proposed to achieve these objectives.

3.2.9 The NZS was developed through collaborative engagement with industry partners and is based on industry best practice. It was drafted during a period of uncertainty and change, driven by new policy recommendations to deliver the government’s net zero ambitions and to respond to the impacts of the Covid-19



pandemic on the aviation industry. It is to be noted that the NZS is a living document – to be revisited and consulted upon regularly to ensure it responds to any legislative and policy changes and remains fit for purpose.

3.2.10 The NZS considers GHG emissions in the three distinct groups, or ‘scopes’, as defined in the most widely-used standards and guidance from the GHG Protocol (Ref 3.2). These scopes are defined as follows:

- a. Scope 1: These are direct emissions from sources controlled or owned by Luton Rising. Examples include onsite heat generation and vehicles.
- b. Scope 2: These are indirect energy emissions from the external generation of electricity, heat and cool for direct use by Luton Rising.
- c. Scope 3: These are indirect emissions which arise due to the activities of third parties and which are not classified as Scope 2. Examples include emissions arising due to supply chain activities, use of downstream products, surface access and aviation.

3.2.11 In summary, the NZS makes the following key commitments in relation to Luton Rising’s broader activities (set out in more detail in Section 4):

- a. minimising carbon emissions associated with construction through use of low-carbon materials and material reuse, and low carbon construction techniques, and developing targets for the net carbon impact of construction activities;
- b. delivering net zero carbon ground operations from 2040, by first minimising direct emissions and then offsetting or removing to balance residual emissions;
- c. delivering carbon neutral surface access from 2040, by supporting a shift to sustainable modes and zero-carbon vehicles, and then offsetting to balance residual emissions; and
- d. Luton Rising playing its part in delivering the government’s ambition for net zero aviation through supply of SAFs and support for electric aircraft.

## 4 SUSTAINABILITY MEASURES

### 4.1 Introduction

- 4.1.1 The Applicant's Sustainability Strategy (Ref ES.1) outlines a comprehensive framework for future development and growth to take place at the airport in a way that is sustainable and has regard to stakeholder expectations (see section 3.2).
- 4.1.2 It is important for any approach to sustainability to be holistic and span across the design, construction and operation of the Proposed Development.
- 4.1.3 This section reviews the approach to sustainability taken through the Proposed Development, as it relates to the five strategic objectives of the Sustainability Strategy:
- a. protecting and enhancing the natural environment;
  - b. delivering climate resilience and business continuity;
  - c. leading the transition to Carbon Net Zero;
  - d. becoming a national hub for green technology, finance, and innovation; and
  - e. be a place to thrive.
- 4.1.4 Each of these objectives are considered in more detail in the following sub-sections, setting out how the Proposed Development approaches each of them throughout its design, construction and operation.

### 4.2 Protecting and enhancing the natural environment

- 4.2.1 The Applicant aims to secure a positive impact for stakeholders by protecting and enhancing the natural environment. This section outlines the measures proposed to manage air quality impacts, resources, and waste, water quality and noise and vibration for the local community, whilst enhancing local biodiversity and delivering good land quality.

#### Managing air quality impacts

- 4.2.2 Poor air quality can affect both human and ecological receptors. As set out in **Chapter 7** of the **ES [TR020001/APP/5.01]** and **Green Controlled Growth (GCG) Framework Explanatory Note [TR020001/APP/7.07]**, the main source of air pollution in Luton (as is generally the case across the nation as a whole) is highway travel, the overwhelming majority of which is unrelated to the airport. However, on some roads in and around Luton there are forecast to be increased levels of traffic due to the Proposed Development.
- 4.2.3 The detailed assessments carried out and reported in **Chapter 7** of the **ES [TR020001/APP/5.01]**, accompanying the application for development consent, assess the impacts of the Proposed Development on the total quantity of pollutants emitted (emissions), and how they are dispersed across the local area over time (the measurable concentration of pollutants at given locations).

- 4.2.4 The assessments include modelled scenarios for the current baseline conditions, a future baseline based on the existing 18 mppa passenger limit, and a 'with development' scenario, which includes the expansion of the airport to 32 mppa.

### ***Construction***

- 4.2.5 To minimise the air quality impacts of construction, the Applicant has committed to driving the uptake of low emission vehicles used in the construction of the Proposed Development. This commitment is set out in the Code of Construction Practice (CoCP) provided as **Appendix 4.2** of the **ES [TR020001/APP/5.02]** which is secured by Requirement in Schedule 2 of the **draft DCO [TR020001/APP/2.01]**, whereby lead contractors will be provided with a specification that all HGVs used on and off-site should meet Euro VI emission standards as a minimum requirement.
- 4.2.6 Further measures to manage air quality are outlined within the CoCP as follows:
- a. Implementation of a Dust Management Plan to be prepared by the lead contractor, covering, for instance, methods to clean and suppress dust on haul routes (including watering) and in designated vehicle waiting areas. The frequency of cleaning will be suitable for the purposes of suppressing dust emissions from the site boundaries.
  - b. Installation of hard surfaced haul routes which are regularly damped down with fixed or mobile sprinkler systems, or water bowsers, and regularly cleaned.
  - c. Ensuring construction traffic access routes avoid sensitive areas as far as reasonably practicable.

### ***Operation***

- 4.2.7 The following measures are proposed within the **ES [TR020001/APP/5.01]** and the Energy Statement (**Appendix 4.3** of the **ES [TR020001/APP/5.02]**) and are secured via the Outline Operational Air Quality Plan (**Appendix 7.5** of the **ES [TR020001/APP/5.02]**) and Outline GHG Action Plan (**Appendix 12.1** of the **ES [TR020001/APP/5.02]**) to support air quality management in relation to the airport's operation:
- a. provision of electric vehicle (cars, taxis, buses and coaches) charging infrastructure for both staff and passengers;
  - b. provision of fixed electrical ground power (FEGP) at the new terminal stands and therefore ground power units (GPUs) will not be required. Retrofit all existing stands with FEGP or non-diesel GPUs by 2040;
  - c. all airside vehicles will be electric by 2035 (including ground support equipment, tugs, busses) where available for the vehicle type;
  - d. reduce reliance on fixed combustion plant (boilers and generators) and mobile generators. Provide electrical power at all new permanent locations;

- e. no new fossil fuel heating or generator equipment to be purchased after 2025, in line with normal asset replacement lifecycle; and
- f. if new fixed plant is required, provision of zero emission plant where permissible such as electric equipment or heat pumps.

4.2.8 In addition, the **Surface Access Strategy [TR020001/APP/7.12]** and **Framework Travel Plan (FTP) [TR020001/APP/7.134]** detail the approach towards limiting the impacts associated with surface access related to the Proposed Development, including minimising adverse air quality effects. The **FTP** sets out the structure and approach for future Travel Plans which will be produced in accordance with the requirements of the **draft DCO [TR020001/APP/2.01]**, to deliver upon the vision and objectives for surface access as the airport expands.

4.2.9 The **FTP [TR020001/APP/7.134]** outlines a range of measures which could be used within each Travel Plan to encourage modal shift away from car use to sustainable modes of transport, such as public transport, walking and cycling. Funding for highways improvements is intended to investigate opportunities for parking controls, traffic management and calming measures. There is also a strong focus on the use of new technologies which will be embraced as they emerge, where they can contribute to improving surface access, influencing positive travel behaviour, and enhancing transport infrastructure resilience. Measures within the **FTP** include, but are not limited to:

- a. **Luton DART and Rail:** Extending the Luton DART to the new terminal (Terminal 2), thereby connecting the two terminals to the rail network at Luton Airport Parkway Station and each other, integrating ticketing and promoting better service provision.
- b. **Buses and Coach:** Implementing a brand new coach hub at the new terminal, working with bus and coach operators to create new and extended routes and enhance existing services, providing a new access route to improve bus connectivity and journey time reliability, and exploring additional bus services to poorly connected residential areas.
- c. **Walking and Cycling:** Providing high quality cycle parking and facilities at the new terminal, improving wayfinding across the airport, and exploring contributions to Luton-wide cycling initiatives and plans for schemes that improve access to the airport from nearby local communities.
- d. **Vehicle Access and Parking, Private Hire Vehicles and Taxis:** Ensuring parking and forecourt drop off charges are set to encourage the use of sustainable modes, ensuring parking provision is supporting sustainable surface access, promoting back-filling of taxi and private hire vehicles where possible to reduce empty running, providing additional electric vehicle (EV) charging points to support the transition to zero emission vehicles, minimising queuing and antisocial drop-off by improving forecourt operations, and supporting the expansion of the residents parking zone to the north of the airport.

- e. **Highway Improvements:** Implementing highway improvements to make the network perform better for longer in the areas around the airport in response to the Proposed Development and monitoring key routes to the airport to capture any unintended impacts on local communities.
- f. **Technology:** Improving understanding of passenger and employee travel behaviour through more comprehensive surveys and developing a package of employee travel incentives.

- 4.2.10 An Outline Operational Air Quality Plan (**Appendix 7.5** of the **ES [TR020001/APP/5.02]**) has been included detailing all proposed operational mitigation measures. Air quality monitoring around the airport will be conducted and an air quality emissions inventory will be maintained to help track implementation of the measures and report on an annual basis. This monitoring is also described in the Outline Operational Air Quality Plan (**Appendix 7.5** of the **ES [TR020001/APP/5.02]**), which is secured by a Requirement in the **draft DCO [TR020001/APP/2.01]**.
- 4.2.11 In addition to the measures outlined above, air quality is one of the areas covered by the proposed **GCG Framework [TR020001/APP/7.08]**. The GCG proposals would place controls on four key categories of environmental impact: air quality, GHG emissions, aircraft noise, and surface access mode share. GCG would ensure that growth only takes place within strict environmental limits on these impacts. The airport operator would be required to periodically monitor and report on the extent of impacts associated with the airport in the four limit areas.
- 4.2.12 In the case of air quality specifically, the GCG proposals will make the continued growth of the airport up to the proposed 32 mppa cap contingent on staying within clear limits for air quality based on the measured concentrations of three pollutants (PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub>) which are relevant to human health. Reference should be had to Section 3.3 of the **GCG Explanatory Note [TR020001/APP/7.07]** for more detail on these proposed limits and how they will be managed.

### **Managing Resources and Waste**

- 4.2.13 This section describes the Applicant's proposed measures to effectively manage resources and waste through the construction and operation of the Proposed Development.

#### ***Construction***

- 4.2.14 The design of the Proposed Development will itself be a significant determining factor in the material resources required during construction, as well as the waste generated throughout its design life. A set of **Design Principles [TR020001/APP/7.09]** have been developed and secured by Schedule 2 of the **draft DCO [TR020001/APP/2.01]**, which will guide further design work in the event the application for development consent is approved. Circular economy principles have been included within the Design Principles, in order to ensure the future design makes the most efficient use of the proposed structures and

spaces and the material resources needed to build and maintain them throughout the lifetime of the Proposed Development.

- 4.2.15 Clear objectives have also been set within the CoCP provided as **Appendix 4.2** of the **ES [TR020001/APP/5.02]** and secured through Requirement in Schedule 2 of the **draft DCO [TR020001/APP/2.01]**, 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.
- 4.2.16 The CoCP provided as **Appendix 4.2** of the **ES [TR020001/APP/5.02]** also confirms that materials (made ground and natural soils) outside of the area of historical landfill will be reused in accordance with an overarching Framework Materials Management Plan (FMMP). Individual Material Management Plans (MMP) would subsequently be produced by the lead contractor for all phases and work packages, with reference to the FMMP. The MMPs would be produced after the FMMP and before any earthworks, these would be agreed in principle with the Environment Agency and signed off by a Qualified Person before being placed on the CL:AIRE website. A MMP will be prepared by the lead contractor in line with the CL:AIRE: Definition of Waste Code of Practice (DoW CoP) (Ref 4.1) in order to describe how materials (made ground, natural soils) will be handled and reused on site, during construction works.
- 4.2.17 Excavated material designated as waste, such as that within the area of the historical Eaton Green landfill as part of the earthworks, will be separated and treated in accordance with the Remediation Strategy and reused within the Proposed Development under a bespoke Environmental Permit – ‘deposit for recovery’ (DfR) under the Environmental Permitting (England and Wales) Regulations 2016 (Ref 4.2).
- 4.2.18 The CoCP also outlines the approach to promoting resource efficiency (covering waste minimisation and reuse, recycling, re-use of soils, sustainable material specification, energy, and water) by working with the lead contractors throughout all phases of construction works of the Proposed Development.
- 4.2.19 Measures in the CoCP provided as **Appendix 4.2** of the **ES [TR020001/APP/5.02]** include, but are not limited to:
- a. adherence to targets defined in the Site Waste Management Plan (SWMP), secured through Schedule 2 of the **draft DCO [TR020001/APP/2.01]**, which will be prepared by the lead contractor in accordance with the Outline SWMP, provided in **Appendix 19.1** of the **ES [TR020001/APP/5.02]**, including the following:
    - i. Achieve at least 90% (by weight) material recovery of non-hazardous construction and demolition waste.
    - ii. Achieve at least 50% preparation for reuse, reuse and recycling of municipal waste.
  - b. identifying further opportunities to minimise waste during detailed design activities;



- c. measures such as careful storage of materials on site, minimisation of packaging and the use of re-usable packaging;
- d. avoidance of oversizing of generators for plant and temporary buildings;
- e. use of hybrid or electric plant;
- f. early energy grid connection to minimise use of diesel;
- g. embedding water efficiency measures into facilities such as temporary accommodation and welfare facilities. Measures may include low flush or flush stop toilets, aerated taps and waterless urinals;
- h. implementing water meters and regularly taking readings;
- i. implementing measures to identify, minimise and prevent leakage from construction site water supply system, such as installing leakage monitoring and alert systems; and
- j. adopting efficient technologies for dust suppression, such as efficient nozzle technology to create a more efficient spray pattern and/or the use of wetting additives to improve water efficiency for bowsers.

### **Operation**

- 4.2.20 Measures have also been integrated and embedded into the design of the Proposed Development for the purpose of managing waste and maximising the efficient use of water during operations. These measures include the following:
- a. design of adequate provision for internal and external waste storage to allow waste segregation during operation as secured through the **Design Principles [TR020001/APP/7.09]**; and
  - b. water efficiencies built into the Proposed Development through the Drainage Design Statement (**Appendix 20.4** of the **ES [TR020001/APP/5.02]**) as secured by Requirement in Schedule 2 of the **draft DCO [TR020001/APP/2.01]**. Rainwater harvesting from the roofs will allow greywater storage and re-use where practicable and appropriate. This enables an increase in the level of efficiency in water use per passenger, thus also increasing resilience to drought events.
- 4.2.21 As with construction, a target for municipal waste in line with the ANPS (Ref 2.4) has been included in the Outline Operational Waste Management Plan (**Appendix 19.2** of the **ES [TR020001/APP/5.02]**) for the operational phase. This is to achieve at least 50% preparation for reuse and recycling of municipal waste (waste materials such as at least paper, metal, as far as these waste streams are similar to waste from households).

### **Managing noise and vibration for the local community**

- 4.2.22 Noise is an important issue for people who live and work around the airport. This section describes the approach that will be taken as part of the Proposed

Development to manage noise and vibration throughout the lifecycle of the Proposed Development, including aviation operations.

### **Construction**

- 4.2.23 The CoCP provided as **Appendix 4.2** of the **ES [TR020001/APP/5.02]** outlines the approach to managing construction-related noise and vibration. Through the CoCP and in line with legislation and British Standards, 'best practicable means' (BPM) will be applied during construction works to minimise noise and vibration at neighbouring residential properties and other sensitive receptors (including local businesses and quiet areas designated by the local authority) arising from construction activities.
- 4.2.24 The BPM noise and vibration control measures identified in the CoCP are:
- a. noise and vibration control at source – for example, the selection of quiet and low vibration equipment, review of construction programme and methodology to consider quieter methods, location of equipment on site, control of working hours, the provision of acoustic enclosures and the use of less intrusive alarms, such as broadband vehicle reversing warnings;
  - b. screening – for example, local screening of equipment or perimeter hoarding; and
  - c. if necessary<sup>4</sup>, a scheme of noise insulation<sup>5</sup> to a receiving property in the unlikely event that noise levels exceed the relevant day, evening or night-time Significant Observed Adverse Effect Level (SOAEL)<sup>6</sup> for 10 or more days in any consecutive period of 15 days or for a total number of days exceeding 40 in any six consecutive months.
- 4.2.25 Construction noise and vibration management commitments in the CoCP include:
- a. the lead contractor will be responsible for preparing and implementing a Construction Noise and Vibration Management Plan as part of their Environmental Management System;
  - b. where construction activities that are noisy or could generate perceptible vibration at any sensitive receptor are required to be undertaken during and/ or outside of core daytime working hours (08:00-18:00 Monday to Friday and 08:00-12:00 Saturday), the lead contractor will seek to obtain consent from the relevant local authority under Section 61 of the Control of Pollution Act 1974 for the proposed construction works (excluding non-intrusive surveys); and
  - c. the lead contractor will undertake and report on noise and vibration monitoring, including physical measurements, observational inspections and audits (at regular intervals), and real-time noise and

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<sup>4</sup> Construction noise forecasts in Chapter 16 of the ES do not exceed the relevant SOAEL at any noise sensitive

<sup>5</sup> To be defined in the relevant section 61 consent application

<sup>6</sup> As defined in Chapter 16 of the ES



vibration monitoring. These measures will demonstrate compliance with all noise and vibration requirements, the requirements outlined in the CoCP and any Section 61 consents.

### **Operations**

- 4.2.26 Noise associated with the airport is primarily caused by departing and arriving aircraft (referred to as air noise). Assessments of noise and vibration have also been undertaken other sources of noise and vibration from the operation of the Proposed Development, for example aircraft on the ground as they taxi around the airport and test their engines for safety reasons (together referred to as ground noise), road traffic, the extension of the Luton DART serving the airport and fixed plant (e.g. air handling equipment at the new terminal).
- 4.2.27 The Operational Noise Management– Explanatory Note (**Appendix 16.2** of the ES [TR020001/APP/5.02]) identifies control measures for all operational noise sources<sup>7</sup> and how these measures are secured by the DCO. In line with aviation policy, the Noise Policy Statement for England (Ref 4.5), Planning Practice Guidance - Noise (Ref 4.3) and government’s policy on sustainable development, the Proposed Development includes noise control measures to:
- a. limit and, where possible, reduce the number of people significantly affected by adverse impacts from aircraft noise;
  - b. prevent unacceptable adverse effects on health and quality of life from noise;
  - c. avoid significant adverse effects on health and quality of life from noise;
  - d. mitigate and minimise adverse effects on health and quality of life from noise;
  - e. where possible, contribute to improvements of health and quality of life from noise; and
  - f. share the benefits of future technological improvements between the airport and its local communities to achieve a balance between growth and noise reduction.
- 4.2.28 To meet the aims of government policy and to generally minimise noise as far as reasonably practicable, noise control measures have been embedded into the Proposed Development or defined in compensation policies in the following order:
- a. **mitigation at source:** optimise the construction and masterplan to minimise noise ‘at source’ (e.g., the design of fixed plant noise sources and the location of taxiways and Engine Run Up Bay); and then

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<sup>7</sup> No operational vibration effects have been identified (refer to Chapter 16 Noise and vibration of the ES [TR020001/APP/5.01])

- b. **mitigation by intervention:** measures used purely to control the path of noise from source to receiver (e.g., flight paths [noise preferential routes], noise barriers and bunds); and then
- c. **mitigation by compensation:** through the provision of noise insulation for the receptor (residential and non-residential).

- 4.2.29 Noise control measures for the existing airport operations are set out in the London Luton Airport Noise Action Plan 2019-2023 (Ref 4.4) as required on a five yearly cycle under the Environmental Noise (England) Regulations 2006 (Ref 4.5).
- 4.2.30 As set out in the Operational Noise Management - Explanatory Note (**Appendix 16.2** of the ES [TR020001/APP/5.02]), to control air noise from the Proposed Development a Noise Envelope will be implemented through GCG, which is a framework of legally binding and enforceable limits and controls to manage air noise and other environmental topics. For further information on the Noise Envelope, please refer to the **GCG Explanatory Note [TR020001/APP/7.08]**. As part of the Noise Envelope, noise contour area limits are set along with lower thresholds at which action should be taken to ensure limits are not exceeded. In addition, the existing restriction on the airport of 9,650 aircraft movements during the night quota period (from 23:30 and 06:00) will be maintained. The **GCG Framework [TR020001/APP/7.07]** also includes a new 'oversight' body to ensure compliance informed by an Aircraft Noise Monitoring Plan, that is an Appendix to the **GCG Explanatory Note [TR020001/APP/7.08]**. The Noise Envelope provides certainty to local communities about the amount of noise which can be expected in the future and to give the airport operator and airlines certainty on how they can use the airport. The Noise Envelope will be subject to review every five years to align with the airport operator's future Noise Action Plans.
- 4.2.31 In essence, the Noise Envelope defines the noise outcomes to be achieved, or bettered, rather than the specific mitigation steps employed to achieve the outcomes. The specific measures to be employed will be set out in the airport operator's future Noise Action Plans in line with the Noise Envelope. Given that the airport expansion is planned over an extended period of time, this approach provides appropriate flexibility for the airport operator to identify and implement the optimum mitigation and draw on future technology improvement whilst also providing certainty of the outcomes that will result, even in the reasonable worst-case scenario. The Noise Envelope will also contain a mechanism for the limits to be reduced in future years to ensure that the noise benefits of next-generation aircraft technology are shared between the airport and surrounding communities.
- 4.2.32 All houses identified as experiencing a likely significant noise effect due to the Proposed Development (having taken account of the Noise Envelope) and which also meet the qualifying criteria would be eligible for noise insulation, such as double or secondary glazing, acoustic thermal insulation in lofts and installation of suitable ventilation systems. An existing noise insulation scheme is already offered by the airport operator, however, as part of the Proposed Development, the existing noise insulation scheme would be updated and will

represent a substantial improvement in terms of the extent of the scheme and the number of properties that are eligible. For more information on the noise insulation schemes, please refer to the **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.11]**.

### **Enhancing local biodiversity**

- 4.2.33 As detailed in the Luton Rising Sustainability Strategy (Ref ES.1), the Applicant has committed to the enhancement of biodiversity by delivering a minimum of 10% biodiversity net gain (BNG) across its construction activities and by implementing a biodiversity gain approach to operating its existing assets. Consistent with the Applicant's corporate Sustainability Strategy and the forthcoming provisions of the Environment Act 2021 (Ref 2.1), the Proposed Development includes extensive landscaping and habitat creation and management measures to deliver at least 10% BNG.
- 4.2.34 BNG describes an approach to development that aims to leave the natural environment in a measurably better state than prior to the development. BNG will be measured using the Defra metric version 3.1 (Ref 4.6) to assess the area's value to wildlife in line with policy guidance.
- 4.2.35 Focusing on the principle of BNG, this section outlines the role of the Proposed Development in the delivery of ecosystem health and service benefits; creating and enhancing habitat; and ensuring BNG is implemented across existing assets through green infrastructure.

### **Construction**

- 4.2.36 As outlined within the CoCP (**Appendix 4.2** of the ES **[TR020001/APP/5.02]**), Outline Landscape and Biodiversity Management Plan (Outline LBMP) (**Appendix 8.2** of the ES **[TR020001/APP/5.02]**), and relevant Mitigation Strategies (**Appendices 8.6 to 8.10** of the ES **[TR020001/APP/5.02]**), the Applicant has committed to enhancing local biodiversity through the implementation of measures during the construction of the Proposed Development. These will be monitored, as detailed within the above documents, to determine their success. Measures include, but are not limited to:
- a. Woodland habitat creation and linking of habitats to promote ecological connectivity (e.g. planting new/enhancing existing hedgerows) – as outlined within the **ES [TR020001/APP/5.01]**, approximately 6ha of woodland habitat creation has been included within the area of provision of open space, a further 2.3ha of broadleaved woodland created within the landscape restoration areas, and 4.4ha in the Habitat Creation Area within the east of the Proposed Development as mitigation and enhancement.
  - b. Off-site hedgerow restoration will be implemented to strengthen and improve the existing hedgerow network to the north east and east of the Main Application Site as defined in Chapter 4 of the **ES [TR020001/APP/5.01]**, along with small areas to the south (for details please refer to the Outline LBMP (**Appendix 8.2** of this ES **[TR020001/APP/5.02]**)). These will improve not only the condition of

the habitats themselves, but also the function they provide as wildlife corridors for a range of species including bats, badger and invertebrates. Translocation of protected and notable species to appropriate locations during the appropriate season following best practice guidance (e.g., orchids and associated soils).

- c. Retention and suitable management of arable margins along retained woodland belts and hedgerows to encourage establishment of notable arable plant species – including mitigation measurements for the replacement of open space at Wigmore Valley Park County Wildlife Site (CWS).
- d. Replacement of foraging habitats as part of the Proposed Development (located away from flight paths to avoid bird strike issues).
- e. Habitat creation and enhancements including grassland, hedgerow, and woodland; and artificial roost provision providing alternative foraging and nesting opportunities for species within the Habitat Creation Area.

### ***Operations***

- 4.2.37 The Outline LBMP as provided in **Appendix 8.2** of the ES **[TR020001/APP/5.02]**, and relevant Mitigation Strategies (**Appendices 8.6 to 8.10** of this ES **[TR020001/APP/5.02]**) include commitments to protecting and enhancing local biodiversity. The Outline LBMP has been prepared to set out the high-level requirements for the establishment, management and monitoring of proposed landscape and biodiversity areas in relation to the Proposed Development. Measures include, but are not limited to:
- a. mitigating potential displacement and the loss of habitats for a range of species, including amphibians, reptiles, bats and birds;
  - b. delivering habitat creation at the margins of the Proposed Development to act as a screen between the Proposed Development and adjacent habitats; and
  - c. enhancing and managing retained habitats such as Winch Hill Wood ancient woodland.
- 4.2.38 To reduce pressures on biodiversity on any remaining areas of the designated habitats of the Luton Parkway Verges District Wildlife Site (DWS) within the Order Limits, post and rail fencing will be established to deter 'cut throughs' from the new car park, interpretation boards will be erected to explain the value of the DWS, monitoring and management for litter removal will be enacted.
- 4.2.39 These measures aim to minimise impacts such as trampling and littering which result from human recreational activities and are detailed within the Outline LBMP.
- 4.2.40 In addition, the Outline LBMP also includes prescriptions for the establishment, long term management, and monitoring of habitat creation and litter removal measures.

- 4.2.41 The Outline LBMP also includes measures for the continuation of monitoring and control employed by the airport operator to ensure no significant increase in bird strike risk.
- 4.2.42 Species subject to post-construction monitoring include, but are not limited to:
- a. badgers (including use of a replacement main set for badger (if required), conducted in accordance with a future Natural England licence);
  - b. bats (including use of the site and the use and maintenance of the installed bat boxes conducted in accordance with a future Natural England licence);
  - c. birds (including the use of the site and use and maintenance of the installed bird boxes);
  - d. amphibians (including monitoring of the establishment of the cluster of small replacement wildlife ponds);
  - e. orchid receptor sites; and
  - f. Roman snail sites (if required).

### **Delivering good land quality**

- 4.2.43 The Luton Rising Sustainability Strategy (Ref ES.1) also sets out the Applicant's commitment to delivering good land quality in both the construction and operation of the Proposed Development.
- 4.2.44 This section sets out how the Applicant will protect and enhance land quality as part of the Proposed Development including landscape, heritage and land contamination.

### **Construction**

- 4.2.45 During construction, the Proposed Development will aim to protect and enhance areas of conservation, heritage, and landscape value; implement landscape-scale habitat enhancement; and create habitats of local provenance and foster biosecurity.
- 4.2.46 To achieve this, the CoCP provided as **Appendix 4.2** of the **ES [TR020001/APP/5.02]** includes the following measures:
- a. implementation of measures to protect and enhance landscape value, including:
    - i. careful design and management of temporary construction components;
    - ii. protection of existing trees and vegetation; and
    - iii. monitoring of landscape works;
  - b. consideration of planting, seeding, wildflower seeding, and other landscape works in line with the latest guidance and recommendations as outlined within the CoCP;

- c. management of the impact of construction works (as outlined within the Cultural Heritage Management Plan provided as **Appendix 10.6** of the **ES [TR020001/APP/5.02]**) on cultural heritage assets including designated and non-designated assets;
- d. implementation of measures to mitigate potential avoidable impacts on agricultural land (including provision and maintenance of stock-proof fencing) to avoid soil compaction; reinstating agricultural land which is used temporarily during construction; and timely and ongoing engagement with key stakeholders including landowners, occupiers, and agents;
- e. appropriately qualified environmental management staff will be responsible for monitoring agricultural land quality; and
- f. protection of land quality by appropriately qualified environmental professionals to oversee implementation and verification of the remediation strategy, including excavation and treatment of contaminated soils and/or landfill material and the installation of gas and leachate control systems as appropriate.

4.2.47 The Outline Remediation Strategy (provided as **Appendix 17.5** of the **ES [TR020001/APP/5.02]**) 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. This will reduce the potential for future rainwater infiltration, and therefore potential for leachate generation and mobilisation of contaminants to underlying groundwater. Groundwater monitoring will however, be undertaken in order to identify any potential impacts to allow for additional controls or remediation to be implemented. The Outline Remediation Strategy has been submitted as part of the application for development consent.

4.2.48 Where piling or similar penetrative works are undertaken in areas of land affected by contamination, appropriate guidance will be adhered to. A Foundation Works Risk Assessment (provided at **Appendix 17.6** of the **ES [TR020001/APP/5.02]**) for the Proposed Development over the historical landfill has been produced in accordance with the National Groundwater and Contaminated Land Centre's report Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (NC/99/73 2001) (Ref 4.7)

4.2.49 An Outline Soil Management Plan (SMP) has been provided as **Appendix 6.6** of the **ES [TR020001/APP/5.02]** and has been submitted for the application for development consent. The Outline SMP, developed in accordance with Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009) (Ref 4.8), further outlines measures for the management of soils during the construction phase.

4.2.50 The need to consider land quality measures alongside carbon measures is integral to delivering good land quality. The **ES [TR020001/APP/5.02]** identifies the need to mitigate against the loss of existing carbon sinks through a landscaping strategy to offset any loss of vegetation as secured through the LBMP Requirement in Schedule 2 of the **draft DCO [TR020001/APP/2.01]**.



## ***Operation***

- 4.2.51 Replacement open space is an integral part of the Proposed Development, replacing the existing public open space that would be lost to development in the western part of Wigmore Valley Park. As detailed in the **ES [TR020001/APP/5.02]** and secured through the Outline LBMP the Replacement Open Space proposals will include restoration of existing boundary hedgerows, as well as the planting of new hedgerows and woodland for screening and improved connectivity. The proposals will also include the creation of improved meadow and mown grassland within the area of replacement parkland.
- 4.2.52 The delivery of the replacement open space would also ensure the following, which is secured through the LBMP Requirement in Schedule 2 of the draft DCO **[TR020001/APP/5.02]**:
- a. street furniture elements are agreed with relevant stakeholders and have a coordinated appearance that is appropriate to the surroundings;
  - b. circulation routes are agreed with relevant stakeholders and make provision for a range of users (including cyclists, horse riders and pedestrians); and
  - c. an area at least as large as may be affected by the proposed works is made available for use by the public.

## **4.3 Delivering climate resilience and business continuity**

- 4.3.1 Climate change is a defining issue of our times and poses one of the most pressing challenges for the natural environment and society. The Applicant has committed in the Luton Rising Sustainability Strategy (Ref ES.1) to collaborating with the airport operator and other relevant stakeholders to make sure appropriate measures are implemented to future-proof existing assets as well as those in development, and thereby enhance business continuity capability, preserving value for customers and stakeholders. This section outlines how the Proposed Development will deliver climate resilience and business continuity throughout its lifecycle alongside GHG commitments which are outlined in Section 4.4 of this SS.

### ***Construction***

- 4.3.2 The CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**) presents a comprehensive approach towards climate change resilience by setting out a series of measures aimed at managing climate change risks. During construction, the lead contractor will be required to pay due consideration to the impacts of extreme weather events and related conditions. The CoCP outlines measures to support this, including:
- a. delivery of a high-level risk assessment (in line with climate change projections) of severe weather impacts on the construction process by the main contractor to inform mitigations;

- b. incorporation of all measures deemed necessary and appropriate to manage severe weather events into the main contractors' Environmental Management System – including as a minimum training of personnel and prevention and monitoring arrangements;
- c. implementation of health and safety plans to prevent worker exhaustion due to heat;
- d. adherence to the Construction Surface Water Management Strategy (CSWMS) to manage flood risk during construction; and
- e. safety measures to mitigate against issues caused by high winds such as increase dust or damage to structures/construction plant.

4.3.3 In relation to flood risk, the CoCP outlines the key measures to ensure that the lead contractor undertakes all works associated with construction operations whilst being mindful of impacts to flood risk. The lead contractors will develop construction proposals to ensure that all flood risks are managed correctly. Where appropriate, this will include the provision of evidence that appropriate flood warning and emergency management measures are accounted for, particularly focusing on long-term maintenance and management.

4.3.4 The lead contractor will also be required to submit a report to the Applicant covering flood risk. The report will summarise any applications for environmental flood risk permits and the status of the works, in addition to any flood risk management or mitigation measures to support temporary or permanent works proposals.

4.3.5 Further measures within the CoCP (provided as **Appendix 4.2** of the **ES [TR020001/APP/5.02]**) to reduce significant impacts to flood risk, as informed by the Flood Risk Assessment (**Appendix 20.1** of the **ES [TR020001/APP/5.07]**), are as follows:

- a. removal of obstacles and debris from surface water run-off pathways;
- b. development of a plan to identify suitable access and refuges in the event of severe weather events;
- c. engagement between the lead contractor and the Environment Agency and Lead Local Flood Authority, as appropriate;
- d. awareness of relevant regulatory bodies flood risk management plans during engagement as a reference for the development of specific construction site flood mitigation plans;
- e. use of the Environment Agency's Floodline (a free telephone and text service in the United Kingdom to gain access to flood warnings for businesses and homes) to provide a flood risk warning in flood risk areas within the Proposed Development;
- f. development of flood risk plans accounting for all construction areas located within Flood Zone 2 and 3, areas vulnerable to surface water and groundwater flooding, and other flood risk sources such as sewer flooding and reservoir flooding; and



- g. temporary buildings designed with measures to cool summertime overheating.

### **Operations**

- 4.3.6 The design of the Proposed Development includes several key measures to embed climate resilience, including but not limited to:
- a. accounting for climate change in the design of surface water drainage and pollution capture assets – designing to a 1-in-100-year storm event, and allowing for an increase in precipitation of 40% due to climate change;
  - b. all buildings, surface access routes, taxiways, aprons and other airside and airfield assets to be designed for the climatic conditions projected for the end of their design life;
  - c. incorporating Uninterruptible Power Sources (UPS), which will provide emergency power for critical infrastructure, if mains power fails; and
  - d. developing new de-icing facilities as part of the Proposed Development to secure mitigation to ensure that airport operations are resilient to cold weather events.
- 4.3.7 Regarding operations management, the Applicant has committed to a number of measures to mitigate potential damage to assets and infrastructure. These measures will either be implemented as a matter of standard best practice or are otherwise secured through the **Design Principles [TR020001/APP/7.09]**, the Outline LBMP (**Appendix 8.2** of this ES [TR020001/APP/5.02]) and the Drainage Design Statement (**Appendix 20.4** of the **ES [TR020001/APP/5.02]**). Measures include, but are not limited to:
- a. reviewing existing operating policies and procedures to ensure these can adequately measure and maintain the resilience of new assets designed as part of the Proposed Development;
  - b. reviewing existing Environmental and Safety Management Systems prior to opening to ensure that systems in place have accounted for changing climate risks in future and measures are sufficient to address climate risks relating to increased Summer temperatures and associated lightning strikes and increasing frequency of hot days and heatwaves;
  - c. developing a list of extreme weather-related incidents to assist in identifying climate change projections and thresholds - this data will inform the maintenance process and when extreme weather events are forecast, monitoring will be in place to ensure thresholds are not exceeded or replacement and maintenance is undertaken, where required;
  - d. developing contracts for maintenance and monitoring of assets supported by an annual review of climate change risks and any changes in asset risk category will be documented and further

mitigation measures developed to reduce the risk and ensure assets remain resilient to future climate;

- e. providing back-up generators and emergency response and contingency plans to increase the resilience of the airport power supply during extreme weather events; and
- f. post-planting monitoring to review the selection of species chosen for landscaping and habitat creation with regard to future climate conditions.

4.3.8 Regarding the climate resilience of aviation-related activities, as detailed in the Luton Rising Sustainability Strategy (Ref ES.1) the Applicant has committed to ensuring business continuity, as appropriate, in the context of emergency events. The Major Accidents and Disasters section, provided as **Chapter 15** of the **ES [TR020001/APP/5.01]** outlines the approach to deliver against this through consultation with the existing airport fire safety and emergency resilience officers. In addition, a fire hydrant system will connect to all new aircraft stands and the existing number of emergency water tanks around the runway will be retained.

## 4.4 Leading the transition to Carbon Net Zero

4.4.1 Awareness of the need to protect the environment has never been higher and the requirement for the aviation industry to decarbonise quicker, never clearer. In June 2019, the UK government signed into law a commitment to make the UK a net zero GHG emitter by 2050.

4.4.2 In January 2020, LBC declared a “climate emergency”, pledging to become carbon neutral by 2040 (Ref 3.1). As LBC is the Applicant’s sole shareholder, this aspiration has been integrated into their operations through the NZS (Ref ES.2), committing to achieving zero emission airport operations and carbon neutral surface access by 2040.

4.4.3 For both carbon neutral and net zero strategies, the first steps are the same, with both requiring emissions reductions to the maximum extent across the operations of the Applicant and its suppliers. The distinction between the two terms arises from how residual emissions are addressed thereafter, whereby:

- a. carbon offsets will be used to balance residual emissions to achieve carbon neutral surface access, whilst establishing longer term interventions for carbon removal; and
- b. land-based community measures will be used, where possible, to remove residual emissions to achieve zero emission airport ground operations by 2040.

### ***Construction***

4.4.4 As outlined within the Luton Rising NZS (Ref ES.2) (see section 3.2) and the Outline Greenhouse Gas Action Plan (**Appendix 12.1** of the **ES [TR020001/APP/5.02]**) and secured in Schedule 2 of the **draft DCO [TR020001/APP/2.01]**, the Applicant has committed to achieving

decarbonisation through adopting a whole-life emissions approach and circular economy principles for construction.

- 4.4.5 The CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**) considers the impacts of climate change in relation to all construction-related activities, and mitigation measures in relation to a reduction in carbon emissions.
- 4.4.6 As outlined within the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**), the lead contractor will develop and implement a Carbon Efficiency Plan as part of their Environmental Management System, to manage carbon emissions from construction activities and promote good practice. This will contain measures including:
- a. proposed measures to reduce significant sources of construction energy use (fuel/electricity) and associated carbon emissions;
  - b. delivering the approach to procuring energy from renewable and/or low emission sources;
  - c. delivering the approach to energy and CO<sub>2</sub> monitoring and reporting from relevant site activities including construction activities and the transportation of materials and waste;
  - d. specification of materials with lower embodied GHG emissions within lead contractor's contracts where practicable; and
  - e. consideration of the procurement, maintenance and use of energy and carbon efficient construction plant.
- 4.4.7 Further mitigation measures will consider both the embodied and operational carbon associated with construction works as outlined within the CoCP provided as **Appendix 4.2** of the **ES [TR020001/APP/5.02]**).

### ***Operations***

- 4.4.8 Luton Rising's Sustainability Strategy (Ref ES.1) and NZS (Ref ES.2) both set out its commitment to achieve net zero for airport operations from 2040, and carbon neutral surface access by 2040. This commitment aligns in principle with the government's Jet Zero strategy target to achieve zero emissions airport operations by 2040, however, the degree of alignment will need to be reviewed once the government has published their 'Call for Evidence' with further information on the definitions used in this ambition. Through GCG the Applicant is committing to undertake this review of both the definition of 'airport operations' and the associated Limit from 2040 onwards within three months of government clarifying the scope and pathway to achieving this policy ambition.
- 4.4.9 As outlined within the Energy Statement (**Appendix 4.3** of the **ES [TR020001/APP/5.02]**) and the Outline GHG Action Plan (**Appendix 12.1** of the **ES [TR020001/APP/5.02]**), a key approach to achieving decarbonisation in operation will be through minimising the total amount of energy needed to operate the airport and ensuring that the energy that used comes from low carbon sources, and through promoting active and sustainable transport options for those travelling to and from the airport.

- 4.4.10 Measures included in the Proposed Development to reduce the carbon intensity of airport operations (Scope 1 and 2 emissions) include:
- a. buildings will be designed to at least BREEAM 'Excellent' standard, to be energy efficient with appropriate installations and equipment, as secured through the **Design Principles [TR020001/APP/7.09]**;
  - b. purchase a percentage of energy from low carbon and renewable energy sources;
  - c. generating a percentage of low carbon/renewable energy on-site as secured through the Outline GHG Action Plan, in **Appendix 12.1** of the **ES [TR020001/APP/5.02]**; and
  - d. reducing operational water consumption, through water efficiency measures such as rainwater harvesting, as secured through the Drainage Design Statement (**Appendix 20.4** of the **ES [TR020001/APP/5.02]**).
- 4.4.11 In addition, the two main sources of Scope 3 emissions for an airport are surface access transport (passengers and staff travelling to or from the airport) and aviation (emissions arising from flights). The measures proposed within the **FTP [TR020001/APP/7.13]** (detailed in paragraph 4.2.9 earlier in this document, in relation to air quality) will reduce the carbon intensity of surface access operations including incentivising the use of public transport and electric or other low emissions vehicles for travel to and from the airport.
- 4.4.12 Scope 3 aviation GHG emissions have been excluded from the Applicant's carbon neutral and net zero targets in the context of the UK Emissions Trading Scheme (UK ETS), launched in January 2021, and the commitment in Jet Zero to fully implement the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) in the UK by 2024<sup>8</sup>.
- 4.4.13 Additional measures included in the proposals to reduce Scope 3 emissions are outlined in the GHG Action Plan (**Appendix 12.1** of the **ES [TR020001/APP/5.02]**) and include:
- a. options to incentivise and include infrastructure for future uptake of low and zero carbon fuels for both vehicles using the airport and aircraft;
  - b. the **Surface Access Strategy [TR020001/APP/7.12]** provides a medium to long term direction for shifting from private car use to public transport. Where private cars are used it will incentivise low/zero carbon private transport options for example, electric vehicles;
  - c. steps to reduce emissions from aircraft during the landing and take-off (LTO) cycle will be considered by the airport operator as part of the operating policy/strategy. For example, single/reduced engine taxiing, electric towing, review/minimise use of auxiliary power units (APU), reduce emissions due to aircraft idling and hold;

- d. airport operator to facilitate any future SAF mandate, and encourage the adoption of more efficient aircraft through operating policy/strategy;
- e. provision of EV (cars, taxis, buses and coaches) charging infrastructure for both staff and passengers;
- f. investigation of participation in a car sharing service, including for EVs, and having a number of dedicated bays at the airport for the car sharing service; and
- g. incentivisation of uptake of low emission transportation for freight entering/leaving the airport for example HGV using low carbon technologies, and support for improved access for pedestrians and cyclists to the airport from the local area.

4.4.14 Further measures proposed at the airport to support the government's efforts to decarbonise aviation are outlined in section 4.5 (Becoming a hub for green technology, finance, and innovation).

4.4.15 GHG emissions are one of the areas covered by the GCG proposals. The GCG proposals will make the continued growth of the airport up to the proposed 32 mppa cap contingent on staying within clear limits for GHG emissions from airport ground operations and surface access. Reference should be had to the **GCG Explanatory Note [TR020001/APP/7.08]** for more detail on these proposed limits and how they will be managed.

## 4.5 Becoming a hub for green technology, finance, and innovation

4.5.1 The Luton Rising Sustainability Strategy (Ref ES.1) sets out the Applicant's commitment to transforming the airport into a hub for green technology, finance, and innovation. The hub will itself contribute towards the delivery of the wider sustainability objectives by providing a space to foster research, development, and innovation towards the delivery of sustainable development. This section describes the intended role of the Proposed Development in delivering technological advances through employment and skills development, and investment in innovation and green technology.

4.5.2 Airports will be at the forefront of technological advances in automation and digitalisation whilst grappling with the challenge of sustainability in a traditionally carbon-intensive sector.

4.5.3 To support the government's efforts to decarbonise aviation, measures are included as part of the Proposed Development and referred to in the Outline GHG Action Plan (**Appendix 12.1** of the **ES [TR020001/APP/5.02]**), including:

- a. encouraging the take up of newer aircraft through operating policy and strategy;
- b. encouraging the take up of SAFs through operating policy and strategy;
- c. providing infrastructure to support the uptake of SAFs and ensuring the airport is future-ready for new aircraft technologies and fuels;

- d. providing infrastructure to reduce aircraft emissions while stationary and when moving around the airfield; and
- e. working with the airport operator and airline partners to promote the use of low emissions aircraft.

4.5.4 The Luton Rising NZS (Ref ES.2) further outlines the Luton Rising's approach towards the implementation of green technology. In relation to surface access, there is a commitment to making Luton Rising properties future-ready for new vehicle technologies and fuels to achieve carbon neutral outcomes.

## 4.6 Be a place to thrive

4.6.1 In relation to the Luton Rising Sustainability Strategy (Ref ES.1) objective of making Luton a place to thrive, the key document accompanying the application for development consent is the Employment and Training Strategy (ETS) **[TR020001/APP/7.05]**.

### *Socioeconomics – Employment and Training*

4.6.2 The **ETS [TR020001/APP/7.05]** outlines the ambition to maximise the beneficial employment and economic effects of the expansion of the airport within Luton Borough and the 'Three Counties' area which includes Hertfordshire, Bedfordshire and Buckinghamshire, supporting the broad range of jobs that will be created by growth at the airport across all skill levels and economic sectors.

4.6.3 The ETS sets out the delivery plan to achieve the Applicant's commitment to lay the foundations for economic growth with regards to employment creation and skills development for all regardless of background.

4.6.4 Six goals underpin the **ETS [TR020001/APP/7.05]**:

- c. build on existing institutions and programmes to ensure residents of the Three Counties have the skills to fill jobs created by Proposed Development;
- d. align the airport's growth with growth strategies across the region to maximise the opportunities of the Proposed Development;
- e. be an accessible place to work;
- f. be an inclusive and values-driven place to work;
- g. be seen as an attractive and aspirational place to work, embedding with the airport operator a supportive culture focused on employee development; and
- h. ensure the local workforce is prepared for a sustainable, digital and socially responsible future.

4.6.5 Moreover, the **ETS [TR020001/APP/7.05]** supports the Applicant's aspiration to drive employment opportunities and upskilling for seldom heard groups, the unemployed, young people and support a wide scale programme for apprenticeships and traineeships throughout the construction and operational phases.



- 4.6.6 Educational opportunities, training courses and career support programmes run by local institutions would be encouraged and coordinated to support local residents to take advantage of new employment opportunities made available through the Proposed Development. As new employment opportunities will come into fruition many years into the future, the skills needs and training requirements of future jobs will change. Thus, meeting this goal will require regular engagement between the Applicant, the airport operator, other airport employers and local institutions to ensure training is timely, relevant, and inclusive. Key initiatives include:
- a. encouraging the adoption of skills and training programmes during construction through the implementation of the CoCP; and
  - b. delivering a Luton Jobs and Skills Engagement Programme to create opportunities to provide workplace experience, alongside the opportunity to gain qualifications within the aviation industry for individuals who are currently unemployed or face barriers to employment.
- 4.6.7 During construction, the airport operator will encourage adoption of the Real Living Wage (RLW) for its contractors through the procurement process.
- 4.6.8 During operations, the airport operator would work with employers at the airport to support the RLW to be adopted or maintained across the airport and that high quality employment standards are promoted, including aiming to reduce zero hours contracts. The airport operator has already implemented the RLW and they will support and encourage other businesses across the airport to adopt it. Adoption of RLW will be monitored through the Airport Employer Community Forum (AECF) who are charged with ensuring high working standards at the airport in coordination with employers and through the airport operator's policies.
- 4.6.9 The AECF would work with other businesses at the airport to implement similar measures and create a Luton Workplace Charter, which airport businesses would be encouraged to sign up to. The Charter will promote the airport's values and high working standards, or alternatively encourage and coordinate airport businesses signing up to the "Good Business Charter," developed by LBC<sup>9</sup>. The Workplace Charter would be owned and managed by the AECF, ensuring senior buy-in to deliver the tenets of quality and inclusive workplaces at the airport.
- 4.6.10 Forecasting future skills required will be challenging as the workforce shifts to meet changes and technological advances in automation and digitalisation. The ETS outlines how to prepare for and ensure that the airport has access to the right skills at the right time.
- 4.6.11 It is also crucial that employment opportunities at the expanded airport are accessible to all across the airport region, including to those who may not currently benefit as much as others from the benefits it brings. The ETS will support this through driving employment opportunities and upskilling for seldom

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<sup>9</sup> See Luton Borough Council Corporate Plan 2021-2023 for reference to the Good Business Charter.



heard groups, the unemployed, young people and support inclusive training and employment programme tools and resources through the AECF.

- 4.6.12 Foresight and planning are crucial to ensuring the Proposed Development is ahead of the curve with regards to technological change and championing sustainability throughout the construction and operational phases of the Proposed Development.
- 4.6.13 During construction, a Skills Foresight Leader (SFL) will be appointed as part of the Programme. This role will be held by the airport operator's existing Capex Director. They will set out requirements for construction skills to meet the sustainability objectives and construction innovation requirements set out through the DCO and, where required, will draw on support from specialists to support the procurement process. The specialists will ensure that any new skills required for construction are identified and are available for the construction of the Proposed Development as well as ensuring that new construction methods feed into the procurement process.
- 4.6.14 The role of the SFL would encourage modern methods of construction and engagement with other infrastructure schemes and asset managers to make sure the Proposed Development leads the way in training employees on new and sustainable construction skills they can continue to apply in the future. The SFL would have oversight of how Tier 1 contractors should utilise the skills to take on new technology, new sustainable materials and methods of construction, and more inclusive work environments.
- 4.6.15 The SFL would work with contractors through construction to encourage opportunities for those in training to engage with new and more sustainable methods of construction as well as providing a platform for training initiatives to be delivered, both online and via an existing physical space provided by the Applicant where appropriate. This will help embed good practice and new technologies in construction at the airport.
- 4.6.16 Within the **ETS [TR020001/APP/7.05]**, sustainable, digital, and responsible initiatives towards technological automation and investment have been outlined. This includes creating a more resilient workforce and skills base by tailoring employment and training programmes to meet the needs of growing and emerging sectors and engaging with digital and technology courses at local universities and other educational institutions.

### ***Diversity and Inclusion***

- 4.6.17 The Proposed Development will provide a range of job opportunities, including quality jobs at good wages, and will support engagement with communities that are most in need.
- 4.6.18 The Proposed Development presents a key opportunity to address barriers to work and ensure the opportunities of the airport are available to all, regardless of age, language proficiency, access to transport, wealth, or circumstance. The airport and employers within the airport should recognise the untapped labour potential of groups such as parents, carers and the young and inexperienced.

- 4.6.19 To this end, diversity and inclusion would continue to be promoted by the airport operator. This will be done through the AECF, which would be used as a platform for the operator to share best practice, support initiatives and create a platform to facilitate Equality, Diversity and Inclusion (EDI) discussions. It is encouraged that the AECF would make these channels available to representatives from airport businesses' employees who would be able to escalate any issues. This would be run by the AECF, who would ensure feedback is taken on board. The AECF will ensure that those from vulnerable groups have equality of opportunity both within the working environment of the airport as well as with access to new employment opportunities.
- 4.6.20 The AECF will seek to understand barriers to employment and to creating a more diverse and inclusive airport, building on some of the existing policy currently in place, such as the London Luton Airport Disability Policy (Ref 4.9). The AECF would create an avenue for existing and future employee-led initiatives by its constituent employers, such as gender, disability, ethnicity, religion or sexual orientation-focussed employee groups, to share good practice and resources. The airport operator will endeavour to expand the understanding and specific requirements of employers to create a more diverse and inclusive airport. Where possible, it is encouraged that the airport operator involve representatives from various groups in the AECF (i.e. disability groups, women, Black and Minority Ethnic (BME) groups) to ensure that proposals do not create barriers to access employment for vulnerable groups.
- 4.6.21 In addition, the airport operator will work with supporting agencies, major suppliers, contractors, tenants, concessionaires and service partners by sharing their own tools and resources to support more inclusive workplaces
- 4.6.22 To support vulnerable and protected groups, the **Design Principles [TR020001/APP/7.09]** also set out the Applicant's commitment for the design of the Proposed Development to account for protected groups, including lifts, gender neutral toilets, adequate space for prayer rooms and faith and culture aware provision of eating facilities, adequate location of taxi rank, step-free access to bus stops and facilities. Additional measures under consideration include:
- a. consideration of journeys within the airport e.g., are travelators required; and
  - b. consideration of hearing loops<sup>10</sup> and supporting measures for tannoy<sup>11</sup> announcements.
- 4.6.23 Mobility and accessibility considerations have been factored into the design of the Proposed Development from the outset, to ensure that the airport is providing inclusive access to all types of users.
- 4.6.24 As outlined within the **ETS [TR020001/APP/7.05]**, diversity and inclusion would continue to be promoted through the AECF, which would be used as a platform for the airport operator to share best practice, support initiatives and create a

<sup>10</sup> Hearing loops are a special type of sound system for use by people with hearing aids to receive wireless signals.

<sup>11</sup> A tannoy is a public address system that provides updates and announcements through audio speakers.

platform the facilitate EDI discussions. It is encouraged that the AECF would make these channels available to representatives from airport businesses' who would be able to escalate any issues. This would be run by the AECF, who would ensure feedback is taken on board. The AECF will encourage working environments at the airport such that those from vulnerable groups have equality of opportunity both within the working environment of the airport as well as with access to new employment opportunities.

### ***Health and Wellbeing***

- 4.6.25 The Applicant commits to promoting a positive impact for stakeholders and mitigating potential adverse impacts on health and wellbeing of the local communities during the construction and operational phases of the Proposed Development.
- 4.6.26 The CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**) outlines key measures for the lead contractors to make provision to limit adverse health and wellbeing effects during the construction phase. Measures include, but are not limited to:
- a. provision and implementation of an inclusive community engagement plan to reduce stress and uncertainty associated with the Proposed Development;
  - b. measures to limit visual disturbance through planting and vegetation replacement in open space (see section 4.2); and
  - c. ensuring the reprovision of open spaces are accessible and inclusive, including any playground reprovision (e.g., maintaining access to Wigmore Valley Park until the replacement open space is completed and accessible to the public).
- 4.6.27 The Applicant also commits to mitigating adverse environmental impacts which may cause nuisance effects for the local community during the operation of the Proposed Development, through the measures secured in the Operational Noise Management – Explanatory Note (**Appendix 16.2** of the **ES [TR020001/APP/5.02]**) and Outline Operational Air Quality Plan (**Appendix 7.5** of the **ES [TR020001/APP/5.02]**). As a part of this, all houses identified as experiencing a likely significant noise effect due to the Proposed Development (having taken account of the Noise Envelope) and which also meet the qualifying criteria would be eligible for noise insulation, such as double or secondary glazing, acoustic thermal insulation in lofts and installation of suitable ventilation systems.
- 4.6.28 In relation to aviation activities, the Applicant recognises the need to support the mitigation and offsetting of any future increases in noise, lighting, and air pollution impacts on local community, with emphasis on vulnerable groups (see section 4.2 Protecting and enhancing the natural environment).
- 4.6.29 The Applicant is also committing to a community fund as part of the Proposed Development, which will be known as Community First. Community First will be provided at a fixed rate of £1 of funding for every additional passenger above the planning cap current at the time that the DCO is made. This is in addition to

the existing Community Funding Programme, which will also continue. As the Community First fund will scale with growth, the size of the fund is expected to represent a substantial increase compared to the current Community Funding Programme by the time the airport reaches 32 mppa.

- 4.6.30 Through Community First, the Applicant will provide grant funding to local organisations to assist with delivery of interventions which address LBC's objectives of eliminating poverty and achieving carbon neutrality by 2040. To ensure that benefits of airport growth are shared across the local area, 40% of the proceeds of Community First will be allocated to areas outside of the boundary of the Borough of Luton and 60% allocated for use within the boundary of the Borough of Luton. This is in recognition of the relatively higher incidence of social deprivation in the town.

Further information on Community First can be found in **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]** document, included with the application for development consent.

## 5 CONCLUSION

- 5.1.1 This SS sets out information about the sustainability commitments which form part of the Proposed Development, as detailed in the suite of documents prepared for the application for development consent.
- 5.1.2 It is considered that on matters relating to sustainability, the Proposed Development delivers on the Luton Rising Sustainability (Ref ES.1) and NZS (Ref ES.2) and is aligned with relevant legislation and public policy, at both the national and local level. By developing the design of the Proposed Development within the context of Luton Rising's corporate Sustainability and Net Zero Strategies – the remit of which is wider than the Proposed Development itself – the Applicant is committing to aligning the sustainability objectives of the Proposed Development with those of local and national government, and where feasible, delivering on these ahead of government targets.
- 5.1.3 The following sub-sections provide a high-level overview of how the Proposed Development has responded to policy of relevance to sustainability. For further detail around policy compliance, reference should be had to the **Planning Statement [TR020001/APP/7.01]**.

## 5.2 Protecting and Enhancing the Natural Environment

### *Air Quality*

- 5.2.1 The Proposed Development responds to the air quality objectives of the Environment Act 2021 (Ref 2.1), the Government's 25 Year Environment Plan (Ref 2.7) and the APF (Ref 2.5), as well all the listed local policy, by supporting and encouraging the transition to more sustainable, low-emissions modes of transport. The Proposed Development will encourage airport users and staff to use more sustainable modes of transport to get to and from the site, both in terms of surface access and air travel.
- 5.2.2 In addition, the Proposed Development will replace existing combustion-based energy plant at the airport with either grid connections or zero emissions alternatives, which will further support air quality objectives.
- 5.2.3 As detailed in the **Planning Statement [TR020001/APP/7.01]**, the potential air quality impacts of the Proposed Development have been assessed in the **ES [TR020001/APP/5.01]** and appropriate mitigation will be secured to address any effects. The commitments to manage air quality incorporated within the Proposed Development are set out as part of the mitigation and management measures detailed within the ES **[TR020001/APP/5.01]**, the CoCP (**Appendix 4.2 of the ES [TR020001/APP/5.02]**), the Outline Operational Air Quality Plan (**Appendix 7.5 of the ES [TR020001/APP/5.02]**), the **FTP [TR020001/APP/7.134]** and the **GCG Framework [TR020001/APP/7.08]**.
- 5.2.4 The Proposed Development is therefore considered to be in accordance with the relevant planning policies and provisions governing air quality.

### ***Managing Resources and Waste***

- 5.2.5 The Proposed Development supports the goals set out by legislation, as well as national and local policies relating to the efficient use of materials and resources, by setting objectives to divert waste from landfill and maximise the reuse of materials and use of recycled materials during construction. The Proposed Development is compliant with the requirements of the national policy regarding waste minimisation, diversion from landfill and circular economy principles are applied. The Proposed Development further meets local policy requirements through the use of waste audits undertaken at design stages and following the waste hierarchy.
- 5.2.6 The commitments to manage resources and waste incorporated within the Proposed Development are set out as part of the mitigation and management measures detailed within the **ES [TR020001/APP/5.01]**, the CoCP (**Appendix 4.2 of the ES [TR020001/APP/5.02]**), the Outline SWMP (**Appendix 19.1 of the ES [TR020001/APP/5.02]**), and the Outline Operational Waste Management Plan (**Appendix 19.2 of the ES [TR020001/APP/5.02]**)

### ***Managing noise and vibration for the local community***

- 5.2.7 The Proposed Development responds to the national aviation policies through its application of concepts such as the ICAO Balanced Approach and a Noise Envelope to the proposed expansion of aviation operations. The Noise Envelope will also contain a mechanism for the limits to be reduced in future years to ensure that the noise benefits of next-generation aircraft technology are shared between the airport and surrounding communities. In addition, use of Best Practicable Means throughout construction to mitigate noise and vibration impacts adheres to regulatory requirements, and national and local policy.
- 5.2.8 Compensatory mitigation measures have also been developed so that in combination with the embedded noise management measures they meet the requirements of national policy where noise adverse impacts should be mitigated and reduced to a minimum. This is achieved through the noise insulation scheme which contains eligibility criteria.
- 5.2.9 The commitments to manage noise and vibration incorporated within the Proposed Development are set out as part of the mitigation and management measures detailed within the **ES [TR020001/APP/5.01]**, the CoCP (**Appendix 4.2 of the ES [TR020001/APP/5.02]**), the Operational Noise Management – Explanatory Note (**Appendix 16.2 of the ES [TR020001/APP/5.02]**) and the GCG proposals.

### ***Enhancing local biodiversity***

- 5.2.10 The **ES [TR020001/APP/5.01]** assesses the likely effects of the Proposed Development on ecology and biodiversity, and proposes suitable measures to avoid, mitigate or otherwise compensate for adverse impacts. By designing the Proposed Development to achieve at least 10% BNG through ecological enhancements, and by managing local habitats and monitoring protected species throughout construction and subsequent operations, the proposals



respond to all relevant legislative and both national and local policy requirements.

- 5.2.11 The commitments to protect and enhance biodiversity incorporated within the Proposed Development are set out as part of the mitigation and management measures detailed within the **ES [TR020001/APP/5.01]**, the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**), the species-specific mitigation strategies (**Appendices 8.6 to 8.10** of the **ES [TR020001/APP/5.02]**), the BNG Report (**Appendix 8.5** of the **ES [TR020001/APP/5.02]**), and the Outline LBMP (**Appendix 8.2** of the **ES [TR020001/APP/5.02]**).

### ***Delivering good land quality***

- 5.2.12 The Proposed Development responds to the national and local policies on matters relating to the delivery of good land quality. Through the measures set out in the CoCP the Proposed Development will minimise the impacts of construction activities on local landscapes, heritage assets and agricultural lands, while seeking opportunities enhance land quality through activities such as contaminated land remediation and the management of soil resources. The Proposed Development will also deliver replacement open space to provide an area at least as large as that affected by the proposed works to be made available for use by the public
- 5.2.13 The commitments to protect and enhance biodiversity incorporated within the Proposed Development are set out as part of the mitigation and management measures detailed within the **ES [TR020001/APP/5.01]**, the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**), the Outline LBMP (**Appendix 8.2** of the **ES [TR020001/APP/5.02]**), the Outline SMP (**Appendix 6.6** of the **ES [TR020001/APP/5.02]**) and the Outline Remediation Strategy (**Appendix 17.5** of the **ES [TR020001/APP/5.02]**).

## **5.3 Delivering climate resilience and business continuity**

- 5.3.1 The Proposed Development responds to legislative and both national and local policy requirements by accounting for climate change and investing in measures to maximise the resilience of its assets and operations. The design of the Proposed Development includes several measures to embed resilience to future climatic conditions, as well as the potential impact these conditions could have on key systems such as energy supply.
- 5.3.2 Climate resilience will be considered during the execution of the construction works, with specific measures in the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**) requiring appropriate provisions be made to manage climate and weather-related risks. During operations resilience to changing climatic conditions and extreme weather events will be periodically reviewed by embedding these considerations into Environmental and Safety Management Systems, and through the monitoring and maintenance of assets and operations.
- 5.3.3 The commitments for delivering climate resilience and business continuity incorporated within the Proposed Development are set out as part of the mitigation and management measures detailed within the **ES**



**[TR020001/APP/5.01]**, the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**), the Drainage Design Statement (**Appendix 20.4** of the **ES [TR020001/APP/5.02]**) and the **Design Principles [TR020001/APP/7.09]**.

## **5.4 Leading the transition to Carbon Net Zero**

- 5.4.1 The Applicant has developed a corporate NZS (Ref ES.2) to set out its approach to transitioning to carbon net zero. The commitments set out therein have been taken into account in the Proposed Development.
- 5.4.2 The CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**) for the Proposed Development sets requirements for the lead contractor to develop a Carbon Efficiency Plan and embed carbon reductions within their Environmental Management System. From an operational standpoint, the Applicant is targeting zero emission airport ground operations from 2040, by minimising direct emissions, and will also drive carbon neutrality for surface access operations from 2040 by supporting the shift to sustainable modes of transport and zero-carbon vehicles.
- 5.4.3 The Applicant will also play their part in delivering the government's ambition in relation to carbon and aviation by supporting the adoption of SAFs, electric aircraft and other low emissions alternatives. It is also intended for aviation emissions to be controlled via a combination of the UK ETS and CORSIA, meaning that they cannot exceed the limits set by these market-based mechanisms. Based on these commitments, the Proposed Development addresses all relevant legislative and policy requirements. By incorporating carbon as one of the GCG limits, the Proposed Development makes the continued growth of the airport contingent on delivering on these commitments.
- 5.4.4 The commitments for supporting the transition to net zero carbon incorporated within the Proposed Development are set out as part of the mitigation and management measures detailed within the **ES [TR020001/APP/5.01]**, the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**), the Energy Statement (**Appendix 4.3** of the **ES [TR020001/APP/5.02]**), the Outline GHG Action Plan (**Appendix 12.1** of the **ES [TR020001/APP/5.02]**) and the GCG proposals **[TR020001/APP/7.07]**.

## **5.5 Becoming a national hub for green technology, finance, and innovation**

- 5.5.1 In transforming the airport into a hub for green technology, finance, and innovation, the Applicant will further contribute towards the delivery of the wider sustainability objectives by providing a space to foster research, development, and innovation in green and low/zero emission technologies. The Applicant will also appoint a Skills Foresight Leader (SFL) to facilitate the research of modern methods of construction to make sure the Proposed Development leads the way in training employees on new and sustainable construction skills. In doing so Proposed Development will be fully aligned with local policies which aim to deliver sustainable economic growth. Through these commitments, the Proposed Development responds to local policy and supports the broader sustainability objectives.

5.5.2 The commitments for becoming a hub for green technology, finance and innovation incorporated within the Proposed Development are set out **ETS [TR020001/APP/7.05]** and are further supported by commitments in the Outline GHG Action Plan (**Appendix 12.1** of the **ES [TR020001/APP/5.02]**).

## 5.6 Be a place to thrive

### *Socioeconomics – Employment and Training*

5.6.1 The expansion of the airport and its operations, together with the creation of the new national hub as outlined in section 4.5, will create new employment and training opportunities in the local area. The **ES [TR020001/APP/5.01]** demonstrates the significant benefits associated with the Proposed Development, including the positive impact on direct and indirect forms of employment generated, direct and indirect Gross Value Added (GVA), increased business travel opportunities, increased tourism business and jobs, journey time savings and Air Passenger Duty (APD) revenue.

5.6.2 This responds to the objectives set out by national and local policy, as the Proposed Development will maximise these beneficial employment and economic effects through the commitments detailed the **ETS [TR020001/APP/7.05]** With the inclusion of apprenticeships and opportunities for local residents, the **ETS [TR020001/APP/7.05]** also responds to the requirements set out in national and local policy.

5.6.3 The commitments relating to employment and training incorporated within the Proposed Development are set out in the **ETS [TR020001/APP/7.05]**.

### *Diversity and Inclusion*

5.6.4 The **ETS [TR020001/APP/7.05]** sets out how the Applicant will aim to ensure that the beneficial employment opportunities and economic effects of the Proposed Development are accessible to the most disadvantaged and deprived groups. In addition, the Applicant is also ensuring the design of the Proposed Development is inclusive and accessible to all protected groups. This approach has been informed by an **Equality Impact Assessment [TR020001/APP/7.11]** and will further be supported by a new EDI Forum with representatives from Luton Rising's and other airport businesses' employees. The Proposed Development therefore responds to the requirements of national and local policy, and will meet these by focusing on accessibility.

5.6.5 The commitments relating to diversity and inclusion incorporated within the Proposed Development are set out in the **ETS [TR020001/APP/7.05]**, **Surface Access Strategy [TR020001/APP/7.12]** and the **Design Principles [TR020001/APP/7.09]**, and have been informed by the **Equality Impact Assessment [TR020001/APP/7.11]**.

### *Health and Wellbeing*

5.6.6 The Proposed Development responds to the requirements of both national and local policy relating to health and wellbeing, through the undertaking of the specialist assessments contained within the **ES [TR020001/APP/5.01]** and the

resulting mitigation and management to address the identified impacts. The Proposed Development is expected to have a range of both adverse and beneficial impacts to health and community, with positive impacts to the health of the local population anticipated as a result of increased employment opportunities, but also a suite of mitigation and compensation measures required to reduce the negative impacts, particularly those related to increased noise.

- 5.6.7 Through the implementation of measures contained within the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**), the Proposed Development will mitigate construction impacts relating to nuisance, visual disturbance and access to green/open space, while ensuring local communities are appropriately engaged to address any issues or complaints which may arise.
- 5.6.8 Likewise, during operations, aviation noise will be managed in accordance with the abovementioned approaches (see section 4.2 on *Managing noise and vibration for the local community*). Through these commitments, as well as the proposed compensation and enhancement measures to the local area (e.g., replacement open space) adverse effects will be mitigated, while enhancing the beneficial effects of the Proposed Development on the health and wellbeing of site users and the wider local community.
- 5.6.9 The commitments relating to health and wellbeing incorporated within the Proposed Development are set out as part of the mitigation and management measures detailed within the **ES [TR020001/APP/5.01]** the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**) and **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]**.

## GLOSSARY AND ABBREVIATIONS

<b>Term</b>	<b>Definition</b>
ANPS	Airports National Policy Statement
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment's Environmental Assessment Method
CAEP 6	Committee on Aviation Environmental Protection 6
CoCP	Code of Construction Practice
dB	Decibel
DCO	Development Consent Order
Defra	Department for Environment, Food, and Rural Affairs
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ES	Environmental Statement
FE	Further Education
EV	Electric Vehicle
GCG	Green Controlled Growth
GHG	Greenhouse gas
GPU	Ground power unit
ICAO	International Civil Aviation Organization
LBC	Luton Borough Council
Outline LBMP	Outline Landscape and Biodiversity Management Plan

Luton Rising	A trading name for London Luton Airport Limited
LLAOL	London Luton Airport Operations Limited
MBU	Making Best Use – refers to the policy document ' <i>Beyond the Horizon: The future of UK aviation – Making best use (MBU) of existing runways</i> ' (June 2018)
NEDG	Noise Envelope Design Group
NZS	Net Zero Strategy
RLW	The 'real Living Wage' is an hourly rate of pay independently calculated based on rising living cost
SAF	Sustainable Aviation Fuels
SMP	Soil Management Plan
SS	Sustainability Statement
SuDS	Sustainable urban drainage systems
SWMP	Site Waste Management Plan

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