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London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

8.33 Applicant's Summary of Oral Submissions and Responses to Comments Made at Open Floor Hearing 1, Open Floor Hearing 2 and Post-Hearing Submissions

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.33

London Luton Airport Expansion Development Consent Order



The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

London Luton Airport Expansion Development Consent Order 202x

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London Luton Airport Expansion

Please note: this document contains the Applicant's written summary of oral submissions made by others at the Open Floor Hearing held on 10 August 2023. Where the comment is a post-hearing comment submitted by the Applicant or Interested Party, this is indicated.

1 Item 1: Introduction

1. Luton Rising (the **Applicant**) which is promoting the London Luton Airport Expansion (the **Project**) was represented at the Open Floor Hearing 1 (**OFH1**) by Tom Henderson, BDB Pitmans LLP, Partner (**TH**).

1. The Interested Parties in attendance were:

Roger Lovegrove

Richard Foan

Neil MacArthur – Harpenden Sky

Chris Haden – SLAE

Anne-Marie Davies – Hardwick Parish Council

Mostaque Koyes – Community Interest Luton

Cllr Gillian Fry

Paul Shaw – Slip End Parish Council

Tim North – Holiday Extras Ltd

Ishaq Kazi – Luton Council of Mosques

Imam Qazi MBE – Jamia Ghousia Islamia Trust

Muhammed Qurban – Luton Central Mosque

David Michael

Cllr Stevens

Phillipa Eke

Johan Ward

John Smith

Christopher Smith

Peter White

Helen Reddecliff on behalf of Deborah Carstenson

Caroline Sizer

Jeremy Young

Jonathan Vass

Matthew Fry

Linda Davies

2 Submissions from Interested Parties

2. **Post-hearing note:** the table below contains the written responses the Applicant wishes to submit in response to comments made by the Interested Parties during OFH1:

Ref.	Summary of comments made at OFH1	Applicant's response
1	Roger Lovegrove (Transition Town Letchworth)	

<p>a. The local plan suggested 2000 new homes are required. Luton does not have the road infrastructure to accommodate these new homes plus the additional 14 million passengers.</p>	<p>The Luton Local Plan seeks to plan for and have regard to the implications of a wide range of development across the Borough during the plan period including both housing and airport development. Notably, Policy LLP6 is supportive of airport expansion proposals subject to certain criteria, including that it should:</p> <p><i>“Incorporate sustainable transportation and surface access measures that, in particular, minimise use of the private car, maximise the use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the London Luton Airport Surface Access Strategy”</i></p> <p>As part of the Proposed Development, the applicant is seeking to increase the percentage of journeys to the airport by sustainable modes. Substantial progress has already been made towards this aim with the opening of Luton DART which provides a direct link to Luton Airport Parkway Station. A new coach station is proposed as part of the Proposed Development, and the applicant is also proposing to expand the coach facilities at the existing terminal.</p> <p>Despite measures to increase the proportion of journeys to the airport by public transport, there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development. The proposed strategy aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods. The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst</p>
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		<p>maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate.</p> <p>Detailed assessments of the proposed highway layouts have been undertaken, and can be found within the Transport Assessment [APP-203, AS-123, APP-205, APP-206] and Surface Access Strategy [APP-228], to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.</p> <p>A Green Controlled Growth Framework [APP-218] is proposed which will ensure that the airport operates within particular “limits”. One of these limits relates to surface access – specifically, mode share. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Green Controlled Growth Framework [APP-218] submitted as part of this application for development consent. However, one of the GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.</p>
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b.	<p>7 reasons why future demand will be short and the expansion is therefore unnecessary:</p> <ol style="list-style-type: none">1. Flying is the second most pollutant activity, which is being recognised and younger generation won't fly2. Some airports are more sustainable than others and so passengers avoid Luton3. Growing demand for flying to be taxed and this will reduce numbers e.g. passenger duties and bans on internal flights4. International rail services are improving5. Not flying made popular by celebrities6. CCC SIC carbon budget report promotes no airport capacity increases7. Luton town council may change its policies in the light of public pressure	<p>Please refer to the response to 'Need Case' under lines 4 to 8 of the Applicant's Response to Written Representations made by Members of the public at Deadline 1 (TR020001/APP/8.39).</p>
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2	Richard Foan	
	<p>a. Main issue: minimising impact of air traffic to and from Luton Airport.</p> <p>Before we have increased traffic questions, we should undertake an independent review process to consider how to reduce pollution both noise and fuel, together with improving relations and giving cost reductions for passengers citizens, aircrews, airlines, Luton Airport and our council. This should be done via:</p> <ol style="list-style-type: none"> 1. Review recent airspace change [AD6] – when introduced we were told you would not impact Leighton Buzzard (this is not the case in practice). Many flights overflying Leighton Buzzard, it is more pronounced when we have easterly wind. Shifting boundary of AD6 worthy of consideration e.g. make larger to impact less people. The base of the airspace can be raised, a significant volume of traffic is outbound northern traffic from Heathrow. 2. CDA (continuous descent approaches), not stepped distance should be adopted. If that was enforced financially and by nets, it would significantly reduce the impact. 	<p>The impact of aircraft noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement (ES) [REP1-003] and Chapter 12 Greenhouse Gases of the ES [APP-038].</p> <p>Airspace Change AD6 is an airspace change put forward by the airport operator and not the applicant and is subject to a separate process (Civil Aviation Authority CAP1616) that is outside the scope of the DCO. The Applicant has not made any statements about the noise impact of AD6 on Leighton Buzzard.</p> <p>The implementation of this airspace change is currently in the final stage, known as Post Implementation Review.</p> <p>The airport operator encourages aircraft to use a Continuous Descent Approach (CDA), this technique means an aircraft stays higher for longer and descends at a continuous rate to the runway threshold therefore reducing periods of prolonged level flight at lower altitudes. The use of CDA is in the airport operator's Arrivals Code of Practice and the airport operator regularly achieves their target of 90% compliance and work with airlines to increase CDA performance where possible.</p>

3	HarpendenSky	
	<p>a. The Climate Change Committee report published in June states “no airport expansion shall proceed until a UK wide capacity management framework is in place to assess annually and if required control sector, co2 emissions, and non co2 effects”</p> <p>London Luton airport currently estimates 2.2.million tonnes of [Co2] which expansion will significantly increase .</p> <p>The Six Carbon Budget contains a commitment to reduce emissions by 78% (including airport emissions) – there is no evidence to say LBC supports this. Clean air for all by 2030 is impossible with this expansion.</p> <p>The [AIP 20 DRP 2023] states expectation for LAs to have regard for expectation to use their powers to reach legal limits and targets.</p> <p>PM2.5 air pollution already results 1/16th of deaths. Vulnerable groups disproportionately affected. The Applicant’s ES “Health and Community” chapter shows exposure to airport fumes evidence premature fatality.</p> <p>LBC declared a climate emergency in July 2019 with a carbon neutral target of 2040. Expansion will not allow Clean Air for all by 2030</p>	<p>The Applicant has carefully considered climate change and related matters, including greenhouse gas (GHG) emissions, in bringing forward the Proposed Development. Targets have been set for the aspects of the Proposed Development over which the Applicant has some control, including a goal of net zero emission airport operations and carbon neutral surface access by 2040 and carbon neutral surface access emissions by 2040.</p> <p>Government policy supports the continued growth of aviation to 2050, as recently published in its aviation strategy, Jet Zero and confirmed in the Jet Zero-one year on (July 2023, www.gov.uk).</p> <p>In response to the Climate Change Committee’s reports the Government has confirmed (197, March 2023, www.gov.uk) that it still supports the expansion of airport capacity in line with the policies set out in the Airports National Policy Statement and Beyond the Horizon: Making best use of existing runways and that this expansion is consistent with the ability to meet these overarching carbon targets for the aviation sector.</p> <p>Government has stated it will follow the High Ambition Scenario presented in this policy document, whilst explaining in the Sixth Carbon Budget how this is consistent with reaching net zero by 2050. The application for development consent is consistent with the approach to aviation carbon in the Jet Zero Strategy. The Proposed Development includes</p>

	<p>especially without a halt on the 32 million passengers and alternative the kerosene is aircraft fuel.</p>	<p>additional mitigation measures where possible. These include measures to facilitate the use of Sustainable Aviation Fuels (SAF) and to encourage the use of the most efficient and low-emission aircraft.</p> <p>Outside of the commitments made as part of the Proposed Development, the Applicant retains a keen interest in progressing sustainability within the aviation sector and will continue to engage with, and work with, others on measures which advance the journey to zero carbon aviation.</p> <p>With regard to ground operations and emissions within the Applicant's control, a number of measures have been incorporated into the design of the Proposed Development to support achieving the net zero ambitions. These measures include facilities for greater public transport usage (such as extending the Luton DART to the proposed Terminal 2), improved thermal efficiency, electric vehicle charging, on-site energy generation and storage, new aircraft fuel pipeline connection and storage facilities (reducing the need for fuel to be delivered by road) and sustainable surface and foul water management installations.</p> <p>The Applicant has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but only if strict environmental Limits are observed. The GCG proposals mean that growth at the airport will only be delivered where limits on GHG emissions, amongst other impacts such as on aircraft noise, air quality, and surface access, are adhered to. GCG will be a legally binding framework, and compliance will be overseen by an independent body. Further information can be found in the GCG Explanatory Note [APP-</p>
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		<p>217] and GCG Framework [APP-218] submitted as part of this application for development consent.</p>
<p>c.</p>	<p>LBC's 2022 sustainable report illustrates targets undoubtedly exceeded with 32 million passengers and does not include interim target.</p> <p>Dunstable East Road shows already a disturbing upward trend for PM 2.5 Over the past 12 months, where three of seven measurements are already in excess of 10 microgram objective.</p>	<p>The Applicant considers that the issue raised regarding impacts on air quality was answered within the Applicant's Response to Relevant Representations Part 1 of 4 Air Quality [REP1-020] page 4-20, in response to RR-1441 and others.</p> <p>Chapter 7 Air Quality [AS-076] of the ES has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. This has included a 2019 baseline which has considered the Dunstable East Road monitoring station and modelled human receptors along Dunstable East Road (A505).</p> <p>The assessment concludes that the impact of the Proposed Development would be not significant for the assessment years assessed, including when considering the new PM_{2.5} objectives.</p>
<p>d.</p>	<p>The Applicant and LBC are the largest polluters in the region. Under the DEFRA environmental improvement plan – “p legal target to reduce population exposure to 2.5pcm by 35% in 2014 compared to 2018 levels” there is a new interim target to reduce this by 22% by 2028 being 12 micrograms per cubic meter by the end of January 2028. Luton Rising environmental statement is not up to date as they do not include this interim target. Therefore, there are no mitigation actions, particularly with regard to the early stages.</p>	<p>Chapter 7 Air Quality [AS-076] of the ES has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils.</p> <p>The assessment concludes that the impact of the Proposed Development would be not significant for the assessment years assessed.</p> <p>The more stringent target of 10µg/m³ has been used. Assessment against the more stringent target therefore</p>

		<p>presents a worst-case assessment in the ES. As no significant impacts are predicted using the $10\mu\text{g}/\text{m}^3$ target there would also be no significant impacts when considering the less stringent interim target of $12\mu\text{g}/\text{m}^3$.</p> <p>Appendix 7.5 Outline Operational Air Quality Plan [APP_065] of the Environmental Statement (ES) sets out the measures committed to via the DCO which will help to improve air quality even where no significant impacts are predicted.</p>
e.	<p>Luton is the top four areas for PM 2.5 related deaths as a percentage of total deaths causing an estimated one in 16 deaths. LR community document shows associations between exposure to air pollutants, and adverse health outcomes, most notably premature mortality and hospital emissions linked to longer term exposure. So it would appear meaning LR are aware of the effects of the expansion.</p>	<p>Chapter 7 Air Quality [AS-076] of the ES has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. The assessment concludes that the impact of the Proposed Development would be not significant for the assessment years assessed. It is correct that the Applicant is aware of these effects as the health effects of air quality are assessed and reported in Chapter 13 Health and Community of the Environmental Statement [AS-078] and measures to reduce and mitigate those effects are also identified.</p>
f.	<p>ES chapters inadequate, specifically "Air Quality" and "Health and Community" and a number of pieces of legislation and guidance are not represented which materially effects the environmental case Additionally, the Environment Act and Defra Enviro Improvement Plan 2023 sets new AQ targets not covered in the ES.</p>	<p>The Environment Act 2021 has been considered as appropriate as part of the Environmental Impact Assessment reported in the Environmental Statement (see Table 1.1 of Chapter 1 of the ES [APP-029] and individual discipline chapters). The Environmental Improvement Plan 2023 was published after completion of the Environmental Statement. The PM2.5 target $10\mu\text{g}/\text{m}^3$ to be achieved by 2040 is referenced in Table 7.2 in the Environmental Statement Chapter 7 Air Quality [APP-034]. This would not change the assessment findings.</p>

g.	<p>Vulnerable groups are disproportionately impacted by airport traffic, this is not included in the Applicant's document Chapter 13: Health & Community table 13.11 & must be considered in regard to the likely impact of LA expansion particularly on PM2.5 emissions.</p>	<p>The assessment does include a qualitative statement about any differential effects and variation from the overall population level of significance within the assessment of health effects both within Chapter 13 Health and Community [AS-078] of the ES, in Section 13.9 and in Table 13.15.</p> <p>Vulnerable groups are also considered in the Equality Impact Assessment [AS-129] where, if identified, relevant mitigation secured by the Proposed Development is referred to.</p>
4	<p>Stop Luton Airport Expansion (SLAE)</p>	
a.	<p>Wigmore Valley Park: group founded to save park with members of LBC who told members that park would not be built on for airport expansion</p> <p>Scott Stalham passed from cancer and cared about the loss of county wildlife which will incur as a result of additional carparks and the airport expansion.</p> <p>The Council utilises LA Regulation 2012 to exclude the public from meetings, so we cannot clarify whether LBC have leased the land to the Applicant or sold it. Under schedule 1 of the DCO, the description of land states it is "owned by applicant and LBC" indicating it was sold. This land was intended to be in LBC's ownership.</p>	<p>Wigmore Valley Park is owned by Luton Borough Council. The Applicant has entered into a Licence Agreement with the Council in respect of the park. In order to bring forward development, should the DCO be granted, the Applicant would seek to acquire a long leasehold interest in the park. To enable that to happen the Council would need to go through the appropriate processes for disposal of such land, including following any required actions relating to the park's status as an Asset of Community Value.</p> <p>The Applicant acknowledges that this approach does not provide the certainty required for future development and for that reason the land is also included within the Compulsory Acquisition powers sought within the application. The Applicant is however keen to not have to resort to use of such powers.</p>
b.	<p>SLAE asks conditions to be applied within DCO to remove the labour council management committee (who are</p>	<p>The Applicant does not consider it appropriate to comment on requests that conditions be added to the draft DCO which seek to remove lawfully elected officials from post.</p>

	currently in charge of such decision) to be removed when airport expansion decisions made as there is no trust.	The relationship between the Applicant and Luton Borough Council has been addressed in the document submitted at Deadline 1 on the Roles and Responsibilities of Luton Borough Council (REP1-108)
c.	There are no boundaries between LBC and the Applicant's relationship (such as employment of LBC members by Applicant). LBC CEO is promoting expansion via personal social media account. Luton News printed extract from Hazel Simmons issuing plea to support expansion.	The Applicant considers that it has addressed this point in the document Roles and Responsibilities of Luton Borough Council [REP1-018], which was submitted to the Examining Authority at Deadline 1.
d.	Development management committee: Anne Donavon was not selected to represent Luton, her letter shows how labour council ignores planning laws.	Noted. The Applicant does not feel it would be appropriate to comment on the personal opinions expressed by an ex-Member of Luton Borough Council in their letter of resignation.
e.	Submitting overwhelming duplications and nonevidential material is classed as unreasonable behaviour. e.g., open spaces documents and lack of knowledge of EIA Century Park application (29 June 2021) detailed in more than one application.	The documents the Applicant submitted as part of the application are the documents required under the Planning Act 2008. This Application is made in the form required by Section 37(3)(b) of the Planning Act 2008 and application documents comply with Section 37 of the Planning Act 2008 and those set out in: a. The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ("the APFP Regulations");

		<p>b. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017;</p> <p>c. The Department for Communities and Local Government's 'Planning Act 2008: application form guidance' (June 2013);</p> <p>d. The Planning Inspectorate's 'Advice Note Six: Preparation and submission of application documents' (Version 11).</p> <p>The Applicant appreciates that a high volume of documents submitted in relation to the Application, however these are necessary to provide evidence on the need and impacts of the proposed development consent order. The Applicant notes in each cover letter when a new version of an existing document is submitted.</p> <p>The Applicant is fully aware of the New Century Park application (now Green Horizons Park) and the relationship between the applications, as set out in Section 5 of the Planning Statement [AS-122] and the response to the Rule 6 Letter [PDA-001].</p>
f.	Sustainable aviation and slow recovery – models reflecting passenger growth should take into account the risk of flying to wildfire destinations. Due to global warming some populations may flee to Luton to escape.	The factors are taken into account in the future demand forecasts as fully explained in Section 6 of the Need Case [AS-125] .
g.	Use of word "local", "neighbouring" and "community" is too unspecific (such as within 6.01 of the consultation report rev. 1), there needs to be more clarity.	These are industry standard terms which are used commonly throughout a range of planning and environmental reports.

6	Anne Marie Davis (Chair of Hardwick Parish Council)	
	<p>a. Expansion will have an impact locally and globally.</p> <p>Local effects: Noise pollution as a result of increased engine noise.</p>	<p>The impact of noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the ES [REP1-003].</p> <p>The Noise Envelope (see Green Controlled Growth Explanatory Note [APP-217]) contains a legally binding framework of daytime and night-time noise contour area Limits and the Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the Draft Development Consent Order [AS-067].</p> <p>The Applicant has also substantially extended its noise insulation scheme, including the addition of schemes which will provide the full cost of insulation for habitable rooms in eligible properties exposed above the daytime and night-time Significant Observed Adverse Effect Level (SOAEL). See Draft Compensation Policies Measures and Community First [AS-128] for further details.</p>
	<p>b. Flying directly above Hardwick dumping fumes. Increased road traffic equalling noise and air pollution.</p>	<p>The impact of road traffic noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>

		<p>The Applicant considers that the issue raised regarding fumes and odour was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 9, in response to RR-06277 and others.</p> <p>Chapter 7 Air Quality [AS-076] of the ES has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. The methodology follows Department for Transport and International Civil Aviation Organization guidance that emissions from aircraft above 1,000 feet are unlikely to have a significant impact on local air quality. Aircraft flying directly above Hardwick are expected to be above 1,000 feet. The assessment concludes that the impact of the Proposed Development would be not significant for the assessment years assessed, including at Hardwick.</p>
<p>c.</p>	<p>More employment will mean there is more pressure to build more homes which is evident within Buckinghamshire Council.</p>	<p>Chapter 11 – Economics and Employment [APP-037] of the Environmental Statement (ES) concluded that there would be no significant effects on the local housing market during construction or operation due to additional demand for housing from new workers. For construction, this was based on the expected availability of alternative accommodation. In regard to operation, a review of relevant local plans concluded that the additional demand for workers is not anticipated to place a constraint on the housing markets within the study area, including Buckinghamshire.</p> <p>An Employment and Training Strategy (ETS) has been prepared in liaison with key stakeholders and submitted as</p>

		<p>part of the application for development consent [TR020001/APP-215/7.05]. The ETS specifically focuses on maximising employment opportunities at the local level (Luton) and in the Three Counties of Hertfordshire, Bedfordshire and Buckinghamshire, the principal area of airport employee residence. Through engagement with local government partners, education institutions and training providers, and working together with airport employers and enhancing outreach with local community groups and schools, local employment opportunities will be targeted at existing residents.</p>
<p>d.</p>	<p>Global: Planes flying at altitude deliver their harmful chemical fumes and particulates into the most critical area in our atmosphere, the ozone layer. This will cause a global climate change, as it will increase temperatures resulting in a number of effects such as flooding, loss of glaciers etc.</p>	<p>Commercial passenger aircraft do not typically fly in the ozone layer which starts at approximately over 15km (45,000ft) above the Earth's surface.</p> <p>Atmospheric chemistry is complex with reactions that result in both increases and decreases in ozone. The effects of non-CO₂ emissions are complex and current assessment methodologies are not developed enough to allow assessment at this stage. The Greenhouse Gases assessment reported in Chapter 12 Greenhouse Gases [APP-038] of the Environment Statement (ES) has been undertaken in accordance with accepted methodologies and in compliance with applicable policies, as described in that chapter.</p>
<p>7</p>	<p>Councillor Gillian Fry</p>	
<p>a.</p>	<p>A peer review study found that people who live within 6 miles of an airport have higher levels of asthma and heart problems. Creates infrastructure burdens.</p>	<p>Chapter 7 Air Quality [AS-076] of the Environmental Statement (ES) provides an assessment of air quality from all</p>

<p>Ulez in London aims to reduce traffic emissions whereas Luton will see an increase.</p> <p>Airport commuters are not all going to use trains or Dart meaning there will be even more Co2 from traffic.</p> <p>Within North Hertfordshire, there are 660 houses within 6 miles of the airport.</p>	<p>related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils.</p> <p>The assessment concludes that the impact of the Proposed Development would be not significant for the assessment years assessed. The commitment to continual improvement is clear with Appendix 7.5 Outline Operational Air Quality Plan [APP-065] of the ES, setting out the measures committed to via the DCO to reduce and control impacts on air quality arising from the Proposed Development.</p> <p>A separate assessment of effects on population health resulting from changes in exposure to NO₂ and particulates was undertaken and reported in Chapter 13 Health and Community [AS-078] of the ES. The assessment considered changes in exposure at all concentrations, including below the AQS level, in line with evidence to suggest that health effects occur below limit values.</p> <p>This assessment concluded that the Proposed Development would have no significant impact on population health during operation.</p> <p>A Transport Assessment [APP-203 to APP-206] was undertaken and provides a significant amount of detail on surface access, including the proposed mitigation measures which are designed to accommodate airport-related traffic</p>
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		<p>growth, together with growth associated with background traffic and consented developments.</p>
<p>b.</p>	<p>New carpark sites are being Built over the park negating any environmental benefits of the park and losing more green space. Luton is landlocked so cannot extend beyond the boundaries of Luton to increase this green space.</p>	<p>The Applicant acknowledges the Proposed Development would result in direct loss of part of the southern area of Wigmore Valley Park (including the part designated a County Wildlife Site) and has included provision of Replacement Open Space adjacent to the remain part of the park. The proposals retain the access as existing, and the northern part of the park will still be improved as part of the Green Horizons Park extant planning permission.</p> <p>Once established in Phase 1 the total area of open space will be 10% larger than available today and designed to be better quality with greater accessibility. The open space and areas extending further east will be designed to provide habitats to provide as overall gain in biodiversity of at least 10%.</p> <p>It is acknowledged that the replacement open space is proposed outside of the Luton boundary in North Hertfordshire; the location is essential to ensure connectivity to the remaining open space and habitats, accessible to the people of Luton and currently using the park, rather than a remote location in limited space within the Luton boundary.</p> <p>The Proposed Development has been carefully selected following a three stage Sift process which did consider options for Wigmore Valley Park. A scheme that sought to avoid Wigmore Valley Park in its entirety was developed and</p>

		<p>subsequently appraised at Sift 3 alongside the existing Sift 2 options.</p> <p>This option was however discounted as it proposed development in the Green Belt and outside of the Luton Local Plan LLP6 Strategic Allocation boundary. It was also judged to perform poorly against other criterion, notably on the basis of operations, noise impacts, land ownership and landscape and visual impact considerations.</p> <p>Details of the sifting process can be found in the Design and Access Statement [AS-049, AS-124].</p> <p>Further detail on the future management of Wigmore Valley Park, along with details of how the habitats will be created and managed, is included within the Outline LBMP in Appendix 8.2 of the ES [AS-029].</p>
c.	In favour of more jobs, but we need to make sure infrastructure and the other points are considered.	<p>Infrastructure improvements are proposed as part of the Proposed Development. These include the following:</p> <ul style="list-style-type: none"> a. A new coach station, the extension of DART and additional parking. b. Highway improvements as described within the Transport Assessment [APP-203, AS-123, APP-205, APP-206] and Surface Access Strategy [APP-228], to ensure that volumes of traffic (both existing and proposed) can be accommodated. c. Two new substations and a water treatment facility are proposed as part of the required infrastructure as

		described within the Design and Access Statement [AS-049, AS-124] .
8	Paul Shaw (Slip End Parish council)	
a.	Planes will flyover the southern end of the parish at 3,000 ft and come down at the northern end of parish Issues: Noise, air quality, measurement and monitoring of noise and air quality. This has been submitted in more detail over sets of 3 consultations dating back to 2019 so there is more detail there..	<p>The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>Noise monitoring is undertaken by the airport operator, LLAOL. LLAOL has three fixed noise monitoring terminals and six portable noise monitoring terminals which they use to measure noise in local communities. LLAOL has developed a protocol for determining a suitable location of their portable monitors.</p> <p>When deciding on a location their main aim is to achieve an equable geographical spread around the airport so that as many communities as possible are included in the monitoring programme.</p> <p>Whilst it is not practicable to provide noise monitoring equipment to individuals, LLAOL considers all requests for the positioning of the portable monitors in community areas and requests can be emailed to noise.enquiries@ltn.aero.</p>

		<p>Noise monitoring data is made publicly available through Community Noise Reports on the airport's website. LLAOL also publishes a schedule of community noise monitoring on their website.</p> <p>How noise monitoring data has informed the assessment of noise from the Proposed Development is set out in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>Chapter 7 Air Quality [AS-076] of the ES has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. The assessment concludes that the impact of the Proposed Development would be not significant for the assessment years assessed.</p> <p>The Applicant considers that the issue raised regarding air quality monitoring was answered within the Applicant's Response to Relevant Representations Part 2E of 4 [REP1-025] page 3 and 4, in response to RR-1408 and others.</p>
<p>b.</p>	<p>The expansion will result in increased social issues, such as repeated fly parking by people using the airports and so on.</p>	<p>The Applicant considers that the issue raised regarding fly parking was answered in the Applicant's Response to Relevant Representation Part 2E of 4 (Parish Councils) [REP1-025] on page 23 and 24 in response to RR-0170. It is not clear what other 'social issues' are of concern.</p> <p>The Applicant's approach to monitoring traffic levels is set out in The Outline Transport Related Impacts Monitoring and</p>

		<p>Mitigation Approach (TRIMMA) which is contained at Appendix I of the Transport Assessment (7.02). The Applicant will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring.</p> <p>There is an opportunity through this process to identify any impacts that are being realised in future and seek to investigate the potential implementation of traffic management and/or parking control measures where appropriate.</p>
c.	<p>Some aircrafts are more problematic:</p> <ol style="list-style-type: none"> 1. Freight flights – which operate within early morning hours, e.g. 2am. 2. Wide bodied jets – which have increased noise impacts <p>We have asked the Airport for plans for management and increases with these types of aviation for 5 years. We have had no answer to this. This is an integral part of the Airport's economic plan (i.e. not budget forms of flying), there are other types of aviation which are not part of LRs plan We request the Applicant make a statement of their plans in these types of aviation selection.</p>	<p>The impact of noise (including night-time freight movements and wide-bodied jets) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts.</p> <p>Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>
d.	<p>Better monitoring underneath southern part of the parish required, we were offered equipment under northern area. This has been raised in documentation.</p>	<p>Noise monitoring is undertaken by the airport operator, LLAOL. LLAOL has three fixed noise monitoring terminals and six portable noise monitoring terminals which they use to measure noise in local communities.</p>

		<p>LLAOL has developed a protocol for determining a suitable location of their portable monitors. When deciding on a location their main aim is to achieve an equitable geographical spread around the airport so that as many communities as possible are included in the monitoring programme.</p> <p>Whilst it is not practicable to provide noise monitoring equipment to individuals, LLAOL considers all requests for the positioning of the portable monitors in community areas and requests can be emailed to noise.enquiries@ltn.aero. Noise monitoring data is made publicly available through Community Noise Reports on the airport's website. LLAOL also publishes a schedule of community noise monitoring on their website.</p> <p>How noise monitoring data has informed the assessment of noise from the Proposed Development is set out in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>
9	Tim North associated limited (Holiday Extras)	
	<p>a. Holiday Extras represent 81% of anticipated long term on site carparking</p> <p>The issue of surface access is therefore of interest.</p> <p>What methodology was employed for mid- and long-term airport carparking data submitted by the Applicant?</p>	<p>It is recognised that off-site parking is one of the options available to access the Airport and this is acknowledged in Chapter 5 of the Transport Assessment [APP-203 to APP-206]. The mode splits for the expanded airport allow for a proportion of the passenger demand to use off-site car parks in the future, as set out in Table 9.5 of the Transport Assessment.</p> <p>The medium and long stay car parking numbers are estimated from the 2019 baseline and take account of the passenger</p>

		<p>growth and the Private Car (On Site Car Park) mode share as shown in Chapter 8 of the Transport Assessment [APP-203 to APP-206]</p> <p>The difference between the car park types is essentially defined by the pricing tariff and the intention would be that the total spaces could be used flexibly. The role and impact of pricing as a demand management tool is something the airport operator currently considers as part of their surface access strategy, and will continue to use to achieve surface assess and mode share targets.</p>
b.	In mid-November 2019 – February 2020, discussions with Holiday Extras and the Applicant of a new satellite carparking facility took place. These discussions ceased without explanation. Benefits of off airport car park are: reduction in emissions, minimise carparking on residential streets and encroachment on the parks.	The Applicant considers that the issue raised regarding engagement with Holiday Extras Ltd was answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] page 10-11, in response to RR-0565.
c.	The Applicant secured an off-site Airport carparking facility outside operation of the Airport without planning permission or a certificate of lawful use.	The Applicant has not acquired any interest in any such off-airport parking facility.
d.	Figures which are being given for long and medium term stay at the airport provision are unsatisfactory 26,000 spaces in London Stansted to meet 24 million throughput but Luton airport	Future passenger car parking requirements have been determined from the baseline of 10,550 parking spaces which was the level of car parking required at the point when the airport reached its permitted capacity of 18 mppa.

	<p>have 10,000 spaces in 20212 and only 6,000 more to meet 33 million throughput.</p>	<p>The future car parking takes account of the growth in passengers and the assumed reduction in car parking mode share as set out in Chapter 8 of the Transport Assessment [APP-203 to APP-206].</p> <p>In 2019, the Airport had one car parking space per 1,706 passengers. This reflects the current operation of the Airport and accessibility options. On the basis of the modelling assumptions used in the Transport Assessment, by 2043, there would be one space per 2,000 passengers.</p>
<p>e.</p>	<p>Other reasonable alternatives have not assessed (e.g. those that can't use public transport).</p>	<p>The future year passenger mode share assumptions used in the Transport Assessment [APP-203, AS-123, APP-205, APP-206] are forecast from Civil Aviation Authority passenger survey data which reflects the accessibility of the Airport and the mode choices available to passengers.</p> <p>The passenger mode split shown in Table 9.5 of the Transport Assessment includes taxi, private drop-off/pick-up, private car (on-site car park), private car (off-site car park) and rental car as the main surface access alternatives to public transport. The DCO makes provision for expanded on-site surface access facilities to meet the forecast future demand for vehicular and public transport access.</p> <p>A comprehensive approach to modelling the impact of the Proposed Development has been carried out and this shows that the scheme would not have a significant adverse impact on the operation of the highway network, as described in Chapter 10 of the Transport Assessment [APP-203, AS-123, APP-205, APP-206].</p>

f.	<p>Holiday Extras provides block parking: 5 and half thousand and self-park: 3 and half thousand. Holiday Extras are open to a relationship with LBC and the Applicant if there is way to provide off airport car parking areas.</p>	<p>The Applicant is not pursuing off-site third-party parking options as part of the DCO Submission. However, this approach does not preclude Holiday Extras Limited or any other off-site car park operator from providing new off-site car parking facilities.</p> <p>Any such proposals would be subject to their own planning application, and would be required to demonstrate the associated traffic impacts were acceptable to the relevant local planning authority.</p>
g.	<p>A customer profile is needed when it comes to the allocation of parking: for example some passengers might fly out of Luton but fly back to another Airport as the destination does not have outbound flights to Luton.</p>	<p>Up to date at the point of writing the Transport Assessment industry recognised Civil Aviation Authority (CAA) passenger survey data has been used as the basis for future passenger mode share assumptions in the Transport Assessment [APP-203, AS-123, APP-205, APP-206]. The CAA mode share data reflects the accessibility of the Airport, how it operates and customer profiles.</p>
10	Councillor Stephens (Councillor for South Ward)	
a.	<p>Residents meeting held (with 100 residents) with Antony Aldridge representing Luton Rising.</p> <p>The main fears are: 24 hour flights, and consequences of step up in passengers, noise and parking.</p> <p>Potential solution to carparking discussed with ExA is the instruction of a resident parking scheme, but the interested party wants the Applicant to cover the costs of the resident parking.</p>	<p>The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>The Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the Draft Development Consent Order [AS-067].</p>

		<p>The Applicant will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as detailed in The Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) within Appendix I of 7.02 Transport Assessment Appendices – Part 3 of 3 (Appendices G – M) [APP-202].</p> <p>There is an opportunity through this process to identify any impacts that are being realised in future, and seek to investigate the potential implementation of traffic management and/or parking control measures where appropriate.</p>
b.	<p>The monitoring devices in the gardens are getting readings of above accepted decibel levels.</p>	<p>The Noise Violation Limits defined in Condition 9 of the current planning consent (15/00950/VARCON) only apply to measurements made at the fixed noise monitoring terminals.</p> <p>The assessment of noise in Chapter 16 Noise and Vibration [REP1-003] uses appropriate assessment thresholds based on the Lowest Observed Adverse Effect Level (LOAEL) and the Significant Observed Adverse Effect Levels (SOAEL).</p> <p>These thresholds have been agreed as appropriate with each of the Host Authorities in the draft Statement of Common Ground documents [TR020001/APP/8.13 – 8.18].</p>
c.	<p>Residents are fearful of the impact of night flights, and specifically DHL flights.</p>	<p>The impact of noise (from night flights and freight flights such as those operated by DHL) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details</p>

		<p>can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>The Noise Envelope (see Green Controlled Growth Explanatory Note [APP-217]) contains a legally binding framework of daytime and night-time noise contour area Limits and the Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the Draft Development Consent Order [AS-067].</p> <p>The Applicant has also substantially extended its noise insulation scheme, including the addition of schemes which will provide the full cost of insulation for habitable rooms in eligible properties exposed above the daytime and night-time Significant Observed Adverse Effect Level (SOAEL).</p> <p>See Draft Compensation Policies Measures and Community First [AS-128] for further details.</p>
d.	Residents are fearful of expansion, do not want to oppose but want to express fears of 24 hour flights as reaching the current operational hours predicted without 24 hour flights doesn't seem possible.	The Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the Draft Development Consent Order [AS-067] .
e.	Has there been an impact study into noise levels likely to arise as a result of step changes (i.e. 19million passengers to 22.5 million passengers etc.) and how the air quality will be disadvantaged?	The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. The assessment considers the step changes in airport capacity through three assessment phases where the capacity is expected to reach 21.5mppa, 27mppa and 32mppa respectively. Further details can be

		<p>found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>Chapter 7 Air Quality [AS-076] of the ES has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. The assessment concludes that the impact of the Proposed Development would be not significant for the assessment years assessed.</p>
f.	More long haul flights are taking place and this is likely going to increase as a result of the expansion	Currently, there are no long haul flights using the Airport. The demand forecasts as set out in the Need Case [AS-125] indicate no more than 5% of flights by 2043 being long haul. The implications of such flights have been taken fully into account in the environmental assessment.
g.	Regarding the report into the impacts of noise produced by the airport, when this was requested from the Airport we were questioned and told this will not be available.	The Applicant is unaware of requests being made of it for any such information. If the Applicant were to receive such a request for information which was available to it then it would be provided. It is likely that this refers to a request made to the airport operator which the Applicant is not aware of and unable to comment on.
h.	The flightpath goes over one of the local schools in in Coutinho road, And so that the quality of life and the health of the young people are going to be materially worse and more materially affected by what is going on.	The impact of noise at receptors including schools from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003] . No significant effects have been predicted for any schools including those on Cutenhoe Road.

		<p>Chapter 7 Air Quality [AS-076] of the ES has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. The assessment included all relevant schools within the study area. Surrey Street Primary school is not on a road which exceeds the change criteria for air quality and is therefore not modelled as a specific receptor point. Worst case locations have been selected in the modelling and therefore any effects would be lower than those reported in the ES. The assessment concludes that the impact of the Proposed Development would be not significant for the assessment years assessed.</p>
i.	<p>There are online adverts which tell holiday makers where to park in the ward, and the expansion will lead to more passengers and more parking. These is a major issue with parking at the moment which will only expand in this ward, the woods and east of the town if the Airport expands. A permit scheme was again suggested.</p>	<p>Please see Applicant's response at 8(a).</p> <p>The Applicant will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as detailed in The Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) within Appendix I of 7.02 Transport Assessment Appendices – Part 3 of 3 (Appendices G – M) [APP-202].</p> <p>There is an opportunity through this process to identify any impacts that are being realised in future, and seek to investigate the potential implementation of traffic management and/or parking control measures where appropriate.</p>
j.	<p>Residents believe the flight path has moved nearer to town centre. Can the planning authority look into this?</p>	<p>The Applicant considers this matter has been addressed in the Applicants to Relevant Representations REP1-001.</p>

k.	Have discussions taken place with the Civil Aviation Authority to move the flight path further to the south which will diminish the noise?	Changes to airspace and flightpaths are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment and consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course. A note explaining the relationship between the two processes was submitted at Deadline 1 [REP1-028].
l.	An increased number of DHL flights will cause problems previously raised.	As explained in the Need Case [AS-125] , there is no increase anticipated in the number of dedicated freighter aircraft movements, particularly at night. Please see also Applicant's response at 8(c).
11	Phillipa Eke	
	Noise from aircraft has adverse effect on quality of life (lives in eastern part near hill). 2018/2019 – moved out of back bedrooms of house due to noise, in 2019 acoustic measures were installed.	Please see Applicants response at 6(a).
	Enquired about triple glazing, no compensation available as Harpenden residents, unsure of exact details as to why compensation not available.	Queries regarding eligibility under the current noise insulation schemes should be directed to the airport operator. Eligibility for the enhanced noise insulation scheme which would be introduced should development consent be granted, is set out in Draft Compensation Policies Measures and Community First [AS-128] .
	Environment impacts as stated by other interested parties	Please see Applicant's previous responses.

2.	At a meeting at the Welcome Centre, a consultant representing the airport admitted 'it's hard to justify any kind of expansion of an airport when there's a climate emergency'.	The Applicant has no record of such a conversation.
	Consideration needs to be taken of the price of planes for air travel when arguing 'people need to travel by plane'.	The cost of air travel, including the increasing costs associated with carbon and its abatement are fully allowed for in the demand forecasts as set out in Section 6 of the Need Case [AS-125] .
	The Applicants' website is green washing.	<p>The Applicant does not agree with this comment, and considers that the content of its corporate website is not a matter for this Examination.</p> <p>Notwithstanding this position, the Proposed Development has been informed by the Environmental Impact Assessment (EIA) process and where possible designed to avoid or reduce adverse effects upon the environment in accordance with policy and best practice.</p> <p>Where adverse effects cannot be avoided or further reduced, mitigation and compensation proposals have been established in consultation with stakeholders. The conclusions of the EIA are reported in the Environmental Statement (ES) submitted as part of the application. Both adverse and beneficial effects are reported and the Examining Authority will be able to consider all effects during the examination.</p> <p>The Green Controlled Growth (GCG) framework established for the Proposed Development is one of the most far-reaching commitments to minimising environmental impact ever put</p>

		<p>forward by a UK airport and seeks to manage the growth and operation of the airport through the coming decades within definitive environmental limits. Further information on environmental limits committed to can be found within the GCG Framework [APP-218].</p> <p>The Sustainability Statement [APP-216] submitted as part of this application for development consent, sets out the steps taken both to embed measures, for example to reduce GHG emissions, as well as to futureproof proposals to help support the future implementation of new technology. For example, this includes infrastructure for future uptake of low and zero carbon fuels (e.g. sustainable aviation fuels) and measures to reduce aircraft emissions during landing and take-off cycle (e.g. single/reduced engine taxiing, electric towing, review/minimise use of auxiliary power units).</p>
	Concerned about the detrimental effects of increased traffic which is presented in the IPs relevant representation.	<p>Please see Applicants response at 1a.</p> <p>Highway improvements are described within the Transport Assessment [APP-203, AS-123, APP-205, APP-206] and Surface Access Strategy [APP-228], to ensure that volumes of traffic (both existing and proposed) can be accommodated.</p>
12	Johan Ward	
	a. Luton Airport is the wrong airport to be expanded upon in comparison to other airports that are on a flat plateau, Luton is on a hill meaning when planes land and take-off the noise and pollutants are directed into the town.	<p>The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. The assessment takes into account the elevation of the airport and surrounding communities. Further details can be found in Chapter 16</p>

		<p>Noise and Vibration of the Environmental Statement [REP1-003]. All of the other assessments also take into account the specific location of the Airport. Expansion of London Luton Airport is principally to meet demand in its own catchment area, for which other airports would not be suitable alternatives. An assessment of air quality effects has been undertaken as reported in Chapter 7 of the Environmental Statement (ES) [AS-076] which concluded no significant effects.</p>
b.	Luton Airport is surrounded by a dense population of people who are close to the Airport, the expansion will therefore have heightened negative effects.	Please see Applicant response at 7(a).
c.	Economic benefits: yes, it creates more jobs, but the Airport cannot guarantee these jobs will go to people from Luton and overall quality of life also needs to have importance when reviewing these benefits. Is an expansion needed for jobs? Vauxhall car park, factory etc. provide other employment opportunities which will not impact negatively on Luton Town.	<p>The airport is already one of the largest employers in the town and expansion will generate a large number of employment opportunities. Furthermore, as evidenced in Section 4 of the Need Case [AS-125], growth at the airport plays a part in attracting other companies to expand in the local area and enhance job creation overall.</p> <p>The Employment and Training Strategy [APP-215] has been developed to ensure that, as many of the jobs and economic opportunities generated by the Proposed Development as possible, go to the residents of Luton and the Strategy's Study Area. The Strategy sets out how the Applicant and its strategic partners can maximise employment benefits through collaborative and good proactive approached to employment and training support for residents and businesses at the airport.</p>

13	John Smith	
a.	<p>There is no consideration of the effects on the surrounding communities even if Luton does benefit overall. There will be increased traffic within Junction 10, B653 , Harpenden town centre and Thameslink travel which have either been weakly addressed or not addressed at all.</p>	<p>Section 8 of the Transport Assessment [APP-203 to APP-206] sets out the approach to traffic generation and distribution. The majority of Airport related passengers arrive from the west and via the motorway network. Signage to the Airport is from the major road network and where traffic approaches from the east is signed via the A505.</p> <p>Highway improvements have been proposed on the main road network including M1 Junction 10, the A1081 Airport Way and Vauxhall Way to seek to provide capacity on the main routes into the Airport. Some people may choose to take alternative routes and we have therefore taken steps to provide capacity improvements to the local network to ensure that if they do, local traffic is not adversely impacted.</p> <p>The Applicant has provided additional information at Deadline 1 [Volume 8 Additional Submissions (Examination) 8.30 Trip Distribution Plans] which shows the traffic distribution for Airport users. The distribution plots show that the vast majority of the trips to and from the Airport access from the west via the M1 Junction 10. Whilst some traffic does use the B653 this is relatively small in comparison. Please see Section 8 of the Transport Assessment [APP 203 to APP-206] sets out the approach to traffic generation and distribution.</p>
b.	<p>Primary schools are underneath flightpath, how are these effects mitigated?</p>	<p>Please see Applicant's response at 10(h).</p>

c.	Ancient woodlands, how are these protected?	<p>The is no ancient woodland directly impacted by the Proposed Development, this has been ensured by the design avoiding impact, and allowing for a 15m buffer between works and ancient woodland as is considered best practice and described in section 8.8 of Chapter 8 Biodiversity [AS-027] of the Environmental Statement.</p> <p>The Outline Landscape and Biodiversity Management Plan (Appendix 8.2) [AS-029] will ensure appropriate management of the habitats, including the ancient woodland, for 50 years with monitoring included to identify the need for adjustments to the management as required.</p>
a.	An independent traffic survey should be completed on all local roads, models are currently flawed lacking this. We need meaningful traffic surveys that show the results in a simple format than that a layman can easily understand.	<p>The Transport Assessment [APP-203 to APP-206] for the Airport expansion has been developed through discussions with the relevant highway authorities. This has included discussions on the assessment approach, assessment methodologies and use of transport models which have been taken forward to assess the impacts of the proposed development.</p> <p>The CBLTM-LTN transport model has been used to consider the impacts of the proposed development. The CBLTM-LTN transport model has been developed in accordance with best practice and Department for Transport guidance on traffic modelling as reported in the Highway Local Model Validation Report (LMVR) Appendix E to the Transport Assessment [APP-200]. This has included data collection as reported in the Strategic Modelling data Collection Report Appendix C to the Transport Assessment [APP-200].</p>

b.	Volume five chapter 18 transport and transportation states the B653 to the south of Luton is only attractive for car travel to and from a limited area, which is confined to Harpenden villages along the B 653 and parts of wheeling Garden City and Hatfield. Where is the evidence for this critical assumption? What about passengers from Hartford, where Hardison and even as far away as Chelmsford in Colchester, the B 653 is no more than a country road and already takes a lot of airport traffic to the detriment of the local population.	The Applicant has provided additional information at Deadline 1 [Volume 8 Additional Submissions (Examination) 8.30 Trip Distribution Plans] which shows the traffic distribution for Airport users. The distribution plots show that the vast majority of the trips to and from the Airport access from the west via the M1 Junction 10. Whilst some traffic does use the B653 this is relatively small in comparison. Please see Section 8 of the Transport Assessment [APP 203 to APP-206] sets out the approach to traffic generation and distribution.
c.	The presence of a hard shoulder and increased motorway capacity would most likely improve capacity, but there is no sign of an approved scheme to widen the M1 or provide a hardshoulder, what is the alternative especially considering the lack of interest in smart motorways.	<p>The Transport Assessment [APP-203 to APP-206] included a sensitivity test which considered the potential impact of National Highways not providing the proposed capacity enhancements to the M1 corridor.</p> <p>The result of this test showed that the Proposed Development of Luton Airport could be accommodated even in the absence of these capacity enhancements. The provision of the M1 proposals, therefore, are not considered a constraint on the Proposed Development.</p>
d	Impact of the additional passengers on the rail system will not be minimal, for example Thames Link train from Harpenden in the morning and St Pancras in the evening.	<p>The rail capacity impact analysis is set out within the Transport Assessment [APP-202], section 11.3, which demonstrates that at its peak (32mppa) between 07:00 -10:00 (3 Hour AM Peak) there are forecast to be an additional 41 passengers per train. This suggests that the additional number of trips is not sufficient to require further detailed assessment.</p> <p>The Applicant has committed to monitoring the usage of rail services as part of the Future Travel Plan and if deemed appropriate improvements can be discussed with Train Operating Companies and Network Rail using the Future</p>

		Travel Plan development process and the Airport Transport Forum to prioritise and agree any potential mitigation required.
14	Christopher Smith	
	d. More clarity required on the steps taken to reduce noise impacts.	<p>Mitigation measures to reduce noise impacts are summarised in Section 16.8 and 16.10 of Chapter 16 Noise and Vibration of the Environmental Statement (ES) [REP1-003] and include:</p> <ul style="list-style-type: none"> a. measures within the Code of Construction Practice [APP-049] to manage noise and vibration activities from construction activities; b. a 'Noise Envelope' secured through the Green Controlled Growth Framework [APP-218], which is a legally binding framework of enforceable limits and controls to manage air noise and other environmental topics; c. maintaining the existing restrictions on the airport of 9,650 aircraft movements annually during the night quota period (from 23:30 and 06:00) to limit night-time aircraft noise levels; d. a substantially improved noise insulation scheme (see Draft Compensation Policies Measures and Community First [AS-128]); e. a specially designed facility for engine testing and noise barriers at the airport perimeter to reduce the impact of aircraft ground noise; f. low noise surfacing material for the airport access road; and g. a requirement to design fixed plant (such as substations, fuel storage facilities and other building services) to meet a specified process defined in the

		Fixed Plant Noise Management Plan [APP-112] to control noise and avoid significant effects at the nearest houses and sensitive receptors.
e.	It is argued the expansion will create 11,000 jobs, is this an exact figure?	Growth at the airport in line with the Proposed Development is projected to increase the number of jobs supported by the operation of the Airport across the UK as a whole by 10,800 above the number of jobs supported in 2019 (see Table 8.5 of the Need Case [AS-125])
f.	More information needed on opportunities within the area.	An Employment and Training Strategy (ETS) has been prepared in liaison with key stakeholders and submitted as part of the application for development consent [APP-215] . The ETS sets out the strengths and needs of the local area around skills and training. The ETS specifically focuses on maximising employment opportunities at the local level (Luton) and in the Three Counties of Hertfordshire, Bedfordshire and Buckinghamshire, the principal area of airport employee residence, in particular. These proposals include establishing a Luton Employment and Skills Programme in line with the initiatives set out within the ETS. The Programme will involve engagement with local government partners, education institutions and training providers, promote employment and training opportunities across the airport with local employment support and training institutions, encouraging hiring of apprentices and trainees through procurement and working together with airport employers and enhancing outreach with local community groups and schools.
g.	Parking is a significant problem, as previously mentioned	The Applicant will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as detailed in The Outline Transport Related

		<p>Impacts Monitoring and Mitigation Approach (TRIMMA) within Appendix I of 7.02 Transport Assessment Appendices – Part 3 of 3 (Appendices G – M) [APP-202].</p> <p>There is an opportunity through this process to identify any impacts that are being realised in future, and seek to investigate the potential implementation of traffic management and/or parking control measures where appropriate.</p>
d.	Will there be any CPO? ExA explains Compulsory acquisition under DCO.	The Draft Development Consent Order [AS-067] includes powers of compulsory acquisition, but no residential properties are subject to acquisition.
15	Peter White	
a.	<p>Raised concerns over whether GCG is legally binding as the reading of the Applicants documents does not indicate this and the presence of commercial agreements between Luton rising and the Airport Operator to maximize airport growth with the minimum intervention and the maximum support of the local planning authority the airport will impede GCG.</p> <p>GCG does not exist in the context of this application, it is just presented as a potential scenario. The Applicant states it will only become into play if the application is granted.</p>	<p>Part 3 to Schedule 2 of the Draft Development Consent Order [AS-067] sets out the requirements pertaining to Green Controlled Growth (GCG). Compliance with a DCO is a legal requirement under the provisions of the Planning Act 2008, and therefore it is correct to state that the GCG Framework is a legally binding framework.</p> <p>The GCG Framework will come into force were the application for development consent granted, and once the airport operator serves notice that passenger throughput will increase above the consented limit.</p>
b.	Income is the sole interest of the Applicant and so there are questions over why they would prioritise GCG.	Green Controlled Growth (GCG) has been developed to place Luton Rising's commitment to environmental sustainability at the very centre of the expansion proposals and is considered

		<p>to be one of the most far-reaching commitments to managing environmental effects ever voluntarily put forward by a UK airport. As set out above, the GCG Framework is legally-binding, and so compliance with GCG must be prioritised to enable the sustainable expansion of Luton Airport.</p>
<p>c. Airport emissions under the control of the Operator shows the GCG framework is a political narrative without any backing.</p>		<p>The Green Controlled Growth Framework [APP-218] considers greenhouse gas emissions from three key sources; airport operations, surface access and aviation. This reflects the way that greenhouse gas emissions have been assessed in the Environmental Statement Chapter 12 Greenhouse Gases [APP-038].</p> <p>The definitions utilised within the GCG Framework for airport operations greenhouse gas emissions reflect all relevant best-practice guidance. This includes classification by scope, in accordance with the definitions for scope 1, 2 and 3 emissions set out in The Greenhouse Gas Protocol, and is consistent with the approach set out by the Institute of Environmental Management and Assessment (IEMA) Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance.</p> <p>The GCG Framework also includes a commitment to align the definition of airport operations with any definition adopted by the UK government as part of the Jet Zero commitment to zero emissions airport operations by 2040.</p> <p>In this way, it is considered that the way that the GCG Framework will control GHG emissions from airport operations represents a positive and ambitious commitment to manage</p>

		environmental impacts associated with expansion in a way that reflects latest government policy.
d.	Aircraft noise is not part of GCG under this definition, it is however directly controlled by the operator.	As noted in the Green Controlled Growth Explanatory Note [APP-217] , Green Controlled Growth will place controls on four key categories of environmental effect: air quality, greenhouse gas emissions, aircraft noise, and surface access. These topics have been selected as the areas where environmental effects will continue to change over time, as passenger numbers grow and technology improves. It should be noted therefore that the control of aircraft noise is an integral part of Green Controlled Growth.
16	Helen Redcliffe (on behalf of Debbie Parkinson)	
a.	Representation relates to Strawberry Homes Limited development.	The London Luton Airport expansion is not connected to the Strawberry Homes Limited development.
17	Caroline Sizer	
a.	How many jobs will the expansion create?	The Need Case [AS-125] sets out the benefits of the development, including the creation of 4,400 more jobs in Luton by 2043 through its operation compared to 2019, supporting £698 million of additional GDP. -Across the wider three counties area, including Luton, the additional jobs would be 6,100 and £0.9 billion of additional GDP.
b.	What will the quality of this employment be, LBC's opportunities are poorly paid	As shown in Figure 10 of Appendix 11.1 to the Environmental Statement, jobs at the Airport tend to be higher paid than other jobs in the local area.
c.	More information on career opportunities and job security (Zero hours etc.) required.	The Employment and Training Strategy (ETS) [APP-215] sets out that the Applicant and the airport operator aim for the airport to be a place known for an inclusive and positive work

		<p>environment that provides development opportunities and career prospects at all levels. The airport operator and AECF would be encouraged to take into consideration staff satisfaction and retention, in addition to recognising the positive impacts of staff development.</p> <p>(4.4.24) The Applicant and the airport operator will seek to build on existing activities to ensure that engagement with local education institutions, charities, and community groups is undertaken to support the airport's embedment within local communities, and that the relevant groups are informed about employment and training opportunities related to airport activities.</p> <p>(4.4.12) During operations, the airport operator would work with employers at the airport to support the Real Living Wage (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 discussed through the Airport Employers Community Forum.</p>
d.	Will people become benefit free?	Whilst the Applicant cannot comment on this directly, the response noted at 17(a) illustrates the benefits of the expansion on job creation.
e.	Transparency over where additional money will be spent required, a lot of money has already gone towards Luton Airport, there needs to be monitoring of where this money is spent.	Additional revenues flowing to the Applicant as a result of airport growth will be used in accordance with the Applicant's business aspirations – to continue to support front line services in Luton and across the region and to further the economic and environmental improvement of the area.

f.	There is a lack of monitoring for noise, pollution etc.	Please see Applicants response at 8(a). The Applicant considers that the issue raised regarding air quality monitoring was answered within the Applicant's Response to Relevant Representations Part 2E of 4 [REP1-025] page 3 and 4, in response to RR-1408 and others.
g.	Parking permits will be needed.	The Applicant will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as detailed in The Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) within Appendix I of 7.02 Transport Assessment Appendices – Part 3 of 3 (Appendices G – M) [APP-202] . There is an opportunity through this process to identify any impacts that are being realised in future, and seek to investigate the potential implementation of traffic management and/or parking control measures where appropriate.
h.	There will be further cuts to local services affecting the most vulnerable because the airport becomes a money pit.	The development of the London Luton Airport will have no direct impact on the ability of Luton Borough Council to deliver its statutory services.
i.	General comments: value for money needed, balance needs to take into account environmental impact and quality of life.	The Planning Statement Revision 1 [AS-122] , at chapter 9, sets out how the Applicant considers the planning balance shows that the benefits of airport growth outweigh any negative impacts.
18	Jeremy Young	
j.	Consideration of the environmental effects are important, such as the heatwave from forest fires, flooding and ocean surface levels. The expansion will lead to more climatic disasters.	An assessment of changes to greenhouse gases due to the Proposed Development is provided in the Environmental Statement Chapter 12 Greenhouse Gases [APP-038] . An assessment of climate change resilience and potential climate change impacts is provided in Chapter 9 Climate Change

		<p>Resilience of the Environmental Statement [AP-035] which concluded no significant effects.</p>
<p>k.</p>	<p>Climate change committee report on 28 June 2023, R2023-037 states “no airport expansion should be undertakencertainly not before 2025”. Does LBC know something the committee is overlooking?</p>	<p>The Applicant does not <i>‘know something the committee is overlooking’</i> as suggested. The report from the Climate Change Committee is not Government Policy.</p> <p>The application is in line with current government policy on aviation. The Committee on Climate Change made a similar recommendation in its Progress Report to Parliament in 2022. The Government responded to this report in March 2023 and made clear at #197 that <i>“We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits.</i></p> <p><i>“Our 'high ambition' scenario has residual emissions of 19 MtCO2e in 2050, compared to 23 MtCO2e residual emissions in the CCC’s Balanced Pathway. “Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure.”</i></p>

		There is no reason to believe that the Government's response to the latest CCC recommendation for aviation will differ from that given earlier this year.
	i. New and Economic Foundations 17 July 2023 "losing altitude" report highlights the environmental damage caused by aviation.	Noted.
	m. Luton Town was voted the worse town in Britain to live in. Instead if expanding the Airport, it would be better to support the green economy and high skilled employment not low paid, low skilled work in aviation,	Expansion of the airport will lead to the creation of a substantial number of jobs across a range of skill levels as set out in Section 8 of the Need Case [AS-125] . More information on the wages paid to employees at the airport is provided in Appendix 11.1 to the ES [APP-079]
19	Jonathan Bass	
	a. The expansion will lead to parking issues (as mentioned) and the narrow roads leads to additional parking issues	The Applicant will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as detailed in The Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) within Appendix I of 7.02 Transport Assessment Appendices – Part 3 of 3 (Appendices G – M) [APP-202] . There is an opportunity through this process to identify any impacts that are being realised in future, and seek to investigate the potential implementation of traffic management and/or parking control measures where appropriate.
	b. LBC changes its noise policy and rules when they like to fit into the current situation so as not to be in breach.	It is assumed that this comment is in relation to the separate planning application 21/00031/VARCON submitted by the airport operator. This application is separate from the Proposed Development. LBC is neither the Applicant nor the decision maker for this application for development consent.

	a. As previously mentioned, flightpaths are being changed.	<p>There is no proposal to change the flightpaths as a consequence of the DCO. There may be changes to flightpaths in the future as a consequence of the broader modernisation of airspace across the South East of England. These would happen regardless of whether the DCO is approved or not.</p> <p>Changes to airspace and flightpaths are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment and consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course. A note explaining the relationship between the two processes was submitted at Deadline 1 [REP1-028]</p>
	a. Unaware of whether compensation is available.	See Draft Compensation Policies, Measures and Community First [AS – 128] which includes both discretionary compensation schemes being offered by the Applicant and signposts in Section 2 of the document the availability of statutory compensation.
20	Matthew Fry	
	a. Concurs with the noise, parking and pollutions issues previously raised.	<p>Noted.</p> <p>These topics are discussed across multiple responses throughout the course of this document. Please refer to the Applicant's responses above and below.</p>

	b. Main concern is around the economic benefits from the airport, the published numbers estimated for passenger won't go up by 17%. How do the benefits statements deliver on the predicted increased passenger capacity of 1.5 billion?	The economic benefits associated with the airport increasing capacity from 18 mppa to 32 mppa are set out in full in Section 8 of the Need Case [AS-125] . The increase in the contribution made by the airport to the UK's gross domestic product (GDP) is estimated at £1.5 billion a year by 2043 compared to the economic contribution of the airport in 2019.
21	Roger Lovegrove	
	a. Parking problem: it is not illegal to show where people can park for free, what is wrong is the amount that Luton airport charges for parking.	The Applicant will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring. There is an opportunity through this process to identify any impacts that are being realised in future, and seek to investigate the potential implementation of traffic management and/or parking control measures where appropriate.
22	Linda Davis	
	a. Compensation for double glazing is approx. £3,200 which is not enough. Roof insulation also required, not just double glazing.	This is in relation to the current noise insulation scheme. Should development consent be granted, an enhanced noise insulation scheme would be introduced with tiered schemes based on noise exposure with increased monetary contributions (up to the full cost of the insulation package). See Draft Compensation Policies Measures and Community First [AS-128]
	b. Queried whether site visits have been carried out by the ExA in Caddington.	No response from the Applicant required.

3 Submission in lieu of attendance at Open Floor Hearing 1

1	Ian Roper (resident of Rushden in North Hertfordshire)	
a.	<p>Aircraft noise continues to blight the village. A small shift in flight paths would make a big difference and wouldn't inconvenience others. Why for example aren't aircraft routed over main trunk roads such as the A1 and A10 in this instance. Areas with a higher ambient noise level will be less affected.</p> <p>Images provided in submission looking at flight paths.</p>	<p>Changes to airspace and flightpaths are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment and consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course.</p> <p>A note explaining the relationship between the two processes was submitted at Deadline 1 [REP1-028]</p>
b.	<p>What consideration is being given to environmental and public health impacts caused by these expansion plans?</p>	<p>A full Environmental Impact Assessment (EIA) in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Statutory Instrument Number 572) has been undertaken and the findings are reported in the Environmental Statement submitted with the application [APP-029 to APP-172] (as amended). This reports environmental effects, both adverse and beneficial, so that all effects can be considered by the Examining Authority in planning decisions.</p>
2.	Nicola French	
a.	<p>SAFETY - To increase the passenger numbers as much as requested would mean lots more flights which would definitely impact on the residents,</p>	<p>Please see Applicants response at 6(a).</p>

	schools and businesses on the flight paths of the airport. It must increase the potential for noise pollution, inconvenience and risk of accident.	
b.	CURRENT FLIGHT UPTAKE - interested to know how many current flights are to full capacity of passengers. This is essential as the impact of flying is so massive. It is unacceptable if current flights are not full and also, it should be investigated as to how many currently run with less passengers.	The load factor assumptions are set out in paragraphs 6.6.14-6.6.18 of the Need Case [AS-125] .
c.	ENVIRONMENTAL IMPACT - in the current climate, it is unacceptable to agree to an expansion. Luton does need more jobs for local people, but feel that we should be looking towards more greener businesses and environmentally sound projects. With the demise of local airlines such as Monarch and Debonair, will the hanger sites they have vacated have been repurposed and reused.	A full Environmental Impact Assessment has been undertaken and the findings reported in the Environmental Statement (ES) submitted with the application. The ES reports the effects, both adverse and beneficial, along with measures to be implemented to avoid, reduce, and mitigate those adverse effects, so that all effects can be considered in the planning balance and decisions regarding planning consent. The MAEL (Monarch Airlines Engineering Limited) Hangars have been vacant since MAEL went into administration in 2018/19. We are looking for ways to bring these back into service. Our preferred mechanism creates local skilled engineering jobs.

4 Post Hearing Additional Submissions

1	Peter White	
	<p>Has the applicant revised its plans so that it is prepared to see a borough wide parking scheme introduced when passenger fly parking just moves on, and will it be then funded by the applicant? How will the applicant address passenger parking issues in villages outside the borough boundary? Where will staff park? Airport workers and users are relying on local estates to park. Will the applicant ensure that free onsite parking is available for airport staff at least?</p>	<p>The Applicant will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring. There is an opportunity through this process to identify any impacts that are being realised in future, and seek to investigate the potential implementation of traffic management and/or parking control measures where appropriate.</p> <p>Provision for staff parking is identified in the Part 1 to 4 of the Transport Assessment [APP-203 to APP-206]. The airport operator does not currently charge staff for parking and has no current plans to do so.</p>
4.	<p>Charitable donations will supposedly increase if passenger numbers increase. It is no coincidence that the charitable donation figures have dropped in line with airport development plans, the DART transit link and this DCO application. Loans were applied for and the available money was used to repay these, rather than to donate to charity. It is also of note that the donations for 2020/21-2021/22 were made from an extra funding pot provided to LR from LBC to enable LR to stay solvent and viable during the Covid pandemic. The applicant has expressed a path where it will seek to fund itself for this development. Does the applicant have a guaranteed charitable</p>	<p>Charitable donations vary from year to year for a variety of reasons, including changes in the law.</p> <p>For accounting good practice, the Applicant cannot provide firm commitments on future levels of charitable donations, indeed to do so could lead to potential breaches of financial regulations.</p> <p>The charitable donations made during the Covid-19 period, when the Applicant endured severely restricted revenue were made from reserves, not as the respondent assets, from borrowing from Luton Borough Council.</p>

	<p>donation plan to ensure that donations will fall no lower than pre-Covid levels? Is the plan available to the public, to see how an increase of passengers will deliver in charitable donations?</p>	<p>Notwithstanding the above, the proposed Community First fund, to be secured through a s106 agreement, would represent an obligation on the Applicant committing it to providing the level of funding set out on an annual basis. It should be noted that Community First is in addition to the Applicants existing charitable donations which it is committed to maintaining in the future.</p> <p>See above Applicant responses on noise monitoring.</p> <p>The Applicant's proposed noise insulation scheme goes over and above noise policy expectations, and extends the insulation scheme substantially further than the current policy operated by the airport. The financial contributions have also been substantially increased. See Draft Compensation Policies Measures and Community First [AS-128] for further details.</p>
	<p>Neighbouring estates to the airport site receive disturbance from aircraft on arrival and departure as well as on the taxiways. This additional noise is not monitored by the airport operator and the noise contour does not cover the entire area affected. Can the qualifying criteria be changed to that insulation is provided to all properties affected? Will ground operations noise be recognised as nuisance and the opportunity made available for residents to lodge complaints within the current system.</p>	<p>The impact of ground noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>Noise monitoring is undertaken by the airport operator, LLAOL. LLAOL have three fixed noise monitoring terminals and six portable noise monitoring terminals which they use to measure noise in local communities. LLAOL have developed a protocol for determining a suitable location of their portable monitors. When deciding on a location their main aim is to achieve an</p>

		<p>equable geographical spread around the airport so that as many communities as possible are included in the monitoring programme. Whilst it is not practicable to provide noise monitoring equipment to individuals, LLAOL consider all requests for the positioning of the portable monitors in community areas and requests can be emailed to noise.enquiries@ltn.aero. Noise monitoring data is made publicly available through Community Noise Reports on the airport's website. LLAOL also publish a schedule of community noise monitoring on their website. How noise monitoring data has informed the assessment of noise from the Proposed Development is set out in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>There is no restriction within the current complaints system stopping complaints about ground noise being lodged.</p>
	<p>In terms of the cost of expansion, what are the acceptable losses for the applicant to deliver this project? Why did the applicant proceed and not change the focus to Phase 1 only or renegotiate the concession agreement to ensure the delivery/costs would be guaranteed to be met by the airport concessionaire? Did the applicant exhaust all options to develop the current airport site to its full potential in terms of terminal capacity, parking options and aircraft parking stand provision? Is all this information publicly available?</p>	<p>The Design and Access Statement Volume 1 [AS-049] sets out the process of optioneering undertaken by the Applicant before determining the preferred scheme for development.</p> <p>The Applicant does not consider that development will be loss making and it will be brought forward on a commercial basis. A key driver for the proposals is to optimise economic benefit across the region, and the Applicant considers that this is best achieved through expansion to 32 mppa. A consented DCO will give permission to grow to this size but to do so will not be an obligation. Growth</p>

		will come forward only in line with demand and a sound commercial proposition. If, at the appropriate time, demand is insufficient to support growth beyond the capacity of an improved existing terminal, then growth could effectively remain at that level.
4.	The applicant used a self-financed growth strategy to grow passenger numbers to the 18 million passengers cap pa 8 years ahead of schedule. Will the applicant add GCG policy legally binding regulations to prevent this happening again under this application? These regulations involve tariffs being paid for new services and premium rates for flights during antisocial hours, agreeing to no financial inducement schemes, and agreeing that any schemes currently in operation will cease within 12 months of the granting of this DCO.	Incentivisation schemes are part of the normal commercial operation of any airport and the Applicant does not consider that the DCO is an appropriate vehicle to intervene in normal commercial relationships.

5 A summary of the Applicant's responses to action point's arising from OFH1

ExA Action Point	Applicant's Response
<p>Confirm in writing whether there have been changes to flightpaths, in light of comments from residents in Slip End and south Luton that planes are approaching closer to the town centre than in the past.</p>	<p>Changes to airspace and flightpaths are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment and consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course.</p>

6 Next steps and closing

6. The Applicant did not make any comments under this Agenda item.

APPLICANT'S SUMMARY OF ORAL SUBMISSIONS AND RESPONSES TO COMMENTS MADE AT THE OPEN FLOOR HEARING HELD ON 11 AUGUST 2023 London Luton Airport Expansion

Please note: this document contains the Applicant's written summary of oral submissions made by others at the Open Floor Hearing held on 11 August 2023. Where the comment is a post-hearing comment submitted by the Applicant or Interested Party, this is indicated.

1 Item 1: Introduction

Luton Rising (the **Applicant**) which is promoting the London Luton Airport Expansion (the **Project**) was represented at the Open Floor Hearing 2 (**OFH2**) by Tom Henderson, BDB Pitmans LLP, Partner (**TH**).

The Interested Parties in attendance were:

Helen Barnett – Active Luton

Andrew Lambourne – LADACAN

Stephanie Simeon – Citizens Advice Luton

Mary Winter – Luton Irish Forum

Peter Cutforth

Karen Perkins – Bedfordshire and Luton Community Foundation

Liliana Busuioc

Ion Mihail Gorgoiu

Prof. Hartley Dean

Julian Gannon

Steve Gent

John Hale

Jane Spendly

Simon Bowes-Lyon

Joseph Kelly

Simon Bowes-Lyon on behalf of Caroline Bowes-Lyon

2 Submissions from Interested Parties

2. **Post-hearing note:** the table below contains the written responses the Applicant wishes to submit in response to comments made by the Interested Parties during OFH1:

Ref	Summary of comments made at OFH2	Applicant's response
1	Andrew Lambourne (Ladacan)	
a.	Timing of the expansion is odd. The Airport is only partway through Project Curium. The overall planning balance is therefore best viewed in the context of Project Curium's success. Curium was conditioned to balance steady growth in passenger numbers and clients with noise mitigation (through, for example, a less noisy fleet). This balance (being benefits vs impacts) was supposed to be assessed over a 15 year period. People also opposed that application as a result of uncertainty. If Project Curium grew to 18 million passengers in 2019 with partial mitigation, and noise levels in breach of the Local Plan, it would have been rejected.	The application for development consent will need to be determined on its own merits, having regard to the considerations set out in S105 of the Planning Act 2008.
b.	In assessing this Application, the panel are assessing a situation in which since 2014, the balance has been wrongly and prematurely tilted in favour of growth and against mitigation, which is why the Applicant's initial wish to use 2019 baselines is so offensive.	The Applicant considers that the issue raised regarding the 2019 baseline was answered within the Applicant's Response to Relevant Representations Part 2C of 4 [REP1-023] page 228, in response to RR-0817. The Applicant considers that the planning balance as set out in the Planning Statement [AS-122] has been appropriately weighted.

Ref	Summary of comments made at OFH2	Applicant's response
c.	<p>A growth incentive scheme has been entered into with the Applicant, Council, and Operator, incentivised airlines to increase passenger growth year on year were financially rewarded this had been funded through public money</p>	<p>Commercially, the Applicant receives income linked (in the main) to passenger throughput. It is the operational business of the airport to attract and retain airlines and to work with airline partners to develop new routes and to manage the capacity of passengers at the Airport.</p> <p>At two specific periods of time in the previous 25 years, the airport operator has had a particular focus, beyond its business as usual, on attracting passenger growth through establishing new routes to create more passenger choice and increase throughput or providing opportunities to airlines to take up and stimulate growth to match passenger demand with increases in the physical capacity of the airport.</p> <p>On both occasions the Applicant agreed with the operator that the Applicant would accept a temporary in-year reduction to the amount of concession fee that it would otherwise have received for the number of incremental passengers that flew on new routes (the first scheme) or the incremental growth in passengers flying year on year with each airline carrier (passenger growth scheme). The benefit of the reduction was passed through to the commercial arrangements agreed between the operator and the airline companies.</p> <p>In both cases the schemes were introduced for a limited number of years and the discounted concession fee applied to a minority proportion of throughput at the</p>

Ref	Summary of comments made at OFH2	Applicant's response
		airport. The usual concession fee applied to the remaining baseline numbers. In neither case does the Applicant consider that those schemes were provided through the use of public funds.
d.	There are section 106 obligations to oversee growth and performance against conditions that LBC does not comply with resulting in contour breach in 2016 which steadily worsened, the passenger cap was reached 9 years too soon (2019/2020) and with the larger and noisier aircraft fleets there are also noise breaches.	<p>It is acknowledged that the current consented noise contour area limits were exceeded in 2017-2019. The Noise Envelope (see Green Controlled Growth Explanatory Note [APP-217]) has been designed to improve upon the existing noise control policy and to effectively prevent breaches from occurring.</p> <p>Appendix 16.2 Operational Noise Management (Explanatory Note) of the Environmental Statement [APP-111] sets out how the proposed Noise Envelope contains mechanisms that should have avoided the noise Limit breaches that occurred at the airport from 2017-2019. This is explained further in the Comparison of consented and proposed operational noise controls document [AS-121]. This provides a direct comparison between the current and proposed operational noise controls, noting that the Noise Envelope provides several enhancements to the current consented noise controls that are designed to prevent breaches before they occur, such as independent scrutiny and oversight, increased transparency, adaptive mitigation and management plans and noise Limit reviews.</p>

Ref	Summary of comments made at OFH2	Applicant's response
		Improvements have been made to the Noise Envelope since submission, and a worked example has been provided which can be used to reasonably conclude that the NE would have avoided the historic breaches that occurred in 2017-2019, see Noise Envelope – improvements and worked example [TR020001/APP/8.36] .
e.	The Applicant receives windfall commercial benefits.	The Applicant has no further comment.
f.	A better airport not a bigger airport is needed particularly given its location. Key mitigations can be delivered if growth is delayed.	The Proposed Development has the express purpose to enhance airport facilities and improve the service to consumers. See Section 7 of the Need Case [AS-125] and Volume II of the Design and Access Statement [AS-124] .
g.	Jet zero is an aspiration, not a policy.	Jet Zero is a government strategy which commits to the UK aviation sector reaching net zero by 2050 and outlines six key policy measures aimed at reducing the climate impacts of aviation.
h.	NSIPs should not be feared, the expansion is triggering fear on multiple fronts being: <ul style="list-style-type: none"> a. Charities and community groups fear if they do not support the Applicant they will lose funding b. Growth in traffic c. Effects on health d. Impacts of noise e. A huge amount of public money has already been spent on the this Project with interest rates which the Applicant fears 	<p>Chapter 13 Health and Community of the Environmental Statement [AS-078] acknowledges effects on mental wellbeing arising from concern about potential adverse effects and identifies measures to reduce this.</p> <p>The Transport Assessment [APP-203 to APP-206] provides a significant amount of detail on surface access, including the proposed mitigation measures which are designed to accommodate airport related</p>

Ref	Summary of comments made at OFH2	Applicant's response
	f. That airports will abandon Luton if the Project does not succeed.	<p>traffic growth, together with growth associated with background traffic and consented developments.</p> <p>The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>The assertion that charities and community groups are acting from fear is nothing other than supposition and conjecture and is not supported by any of the organisations involved.</p> <p>The Applicant proposes that its current Community Funding programme will be maintained irrespective of the proposals for growth, with additional funds being made available through Community First should the application be consented.</p>
i.	The Government's COVID support for Luton policy is predicated on LBC reducing its exposure to airport revenue.	Luton Borough Council's medium-term financial plan has removed dependence on dividend income from its airport subsidiary in accordance with the recommendations of the Department for Levelling Up, Housing and Communities.
j.	The airport's highly respected advisors, York aviation, have produced plausible forecasts for the do minimum or do nothing scenario of continued Fleet	The Applicant has no further comment.

Ref	Summary of comments made at OFH2	Applicant's response
	Modernization out to 2043. With 18 million passengers continuing to be served per year.	
k.	Luton would benefit from a more resilient and diversified local economy, which would deliver the aspirations for this project, but with less environmental and social harms.	<p>The airport is a major employer in the town and expansion will generate a large number of employment opportunities. Furthermore, as evidenced in Section 4 of the Need Case [AS-125], growth at the airport plays a part in attracting other companies to expand in the local area and enhance job creation overall.</p> <p>Luton has a vibrant and diverse economy. This year the University of Bedfordshire was ranked as one of the top universities to start a Social Enterprise. In 2022 the town had the 7th highest private sector job creation in the UK according to the Centre for Cities.</p> <p>In 2021, Fasthosts identified Luton as the best-all round UK location to start a new business, proven to have one the best rates of production, office prices, and business survival rates in the UK.</p>
l.	Of the 1603 relevant reps submitted around 90% are in opposition , which is probably why a petition is now being whipped up also asking people to support the prospect of more jobs and more money in the economy.	<p>Whilst it is expected that nationally significant infrastructure projects will face some opposition, the Applicant has sought to understand and engage with the community on their concerns through extensive community and stakeholder engagement.</p> <p>Notwithstanding this, the application has received a substantive number of supportive representations from members of the public, community groups and businesses from Luton and the wider region.</p>

Ref	Summary of comments made at OFH2	Applicant's response
		<p>The Applicant considers the level of support received for the application is above what is expected for a project of this size. The Applicant notes that the petition that is being referred to is one that has been set up by a community member.</p>
2	<p>Peter Cutforth (Resident of St Albans and founding member of the volunteer working group that manages the Heartwood Forest Woodland Trust site).</p>	
a.	<p>There should be no expansion based on harms from carbon impacts.</p>	<p>An assessment of changes to greenhouse gases due to the Proposed Development is provided in the Environmental Statement Chapter 12 Greenhouse Gases [APP-038]. Following the latest methodology from the Institute of Environmental Management and Assessment on assessing the significance of these emissions (referred to and described in the chapter), the emissions are minor adverse and not significant.</p>
a.	<p>Expansion is incompatible with Net Zero aspirations. The Committee on climate change states there should be no net airport expansion in UK and no individual airport should be allowed to expand until UK wide capacity framework is in place.</p>	<p>The Committee on Climate Change made a similar recommendation in its Progress Report to Parliament in 2022. The Government responded to this report in March 2023 (www.gov.uk) and made clear at number 197 that: <i>"We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by</i></p>

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		<p><i>focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits. Our 'high ambition' scenario has residual emissions of 19 MtCO₂e in 2050, compared to 23 MtCO₂e residual emissions in the CCC's Balanced Pathway. "Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure."</i></p> <p>There is no reason to believe that the Government's response to the latest CCC recommendation for aviation will differ from that given earlier this year.</p>
b.	<p>There is no justification for expansion based on demand. Predictions for demand have not been met in last three years. Reasons for the Luton expansions centre around the generation of income, but no other town generates income by expanding airport. this has to be considered one of the dirtiest ways of making money.</p>	<p>During the Covid-19 pandemic, there were travel restrictions in force which meant that people could not travel. Hence passenger numbers did not reflect previously forecast demand.</p> <p>London Luton Airport is currently operating at over 91% of equivalent passenger levels in 2019 and this recovery is expected to continue, with the airport expected to recover to pre-pandemic traffic levels in the next year. This has been fully taken into account in the demand forecasts set out in the Need Case [AS-125].</p>

Ref	Summary of comments made at OFH2	Applicant's response
c.	The airline industry generally tries to portray that it can become cleaner in the future but this relies on substitute jet fuels and carbon offsetting which are not credible mitigation strategies.	Assumptions relating to SAF uptake and zero emissions aircraft in Chapter 12 of the Environmental Statement [APP-038] have been made in line with the Government's High Ambition scenario within the Jet Zero Strategy.
d.	Non Co2 impacts – these are at least as great as Co2 impacts on climate but the modelling ignores non-Co2 impacts which casts doubts on the credibility of the modelling if it ignores half of the climate impacts.	<p>Non-CO2 emissions are discussed within Section 12.12 of Chapter 12 of the Environmental Statement [APP-038]. There remains significant scientific uncertainty around the overall warming effect of non-CO2 impacts. Furthermore, there is no recognised benchmark against which to compare the emissions of non-CO2 impacts.</p> <p>They are not within the Nationally Determined Contributions declared pursuant to the 2015 Paris Agreement or the carbon budgets set pursuant to the UK Climate Change Act and are not included in the Aviation emissions trajectory for the Jet Zero Strategy High Ambition scenario that this assessment uses as a comparator for Aviation emissions.</p> <p>For these reasons, the assessment has not sought to quantify non-CO2 impacts, consistent with current Government and Committee on Climate Change advice. Ongoing GHG reporting by the Airport will follow all government policy as it evolves on this issue.</p>
e.	Noise (representing Hartwood Forest volunteers): this forest is one of the few places of its size where people go for peace away from major roads. The forest	The impact of noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce

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	attracts over 100,000 visitors per annum meaning the noise impacts are detrimental. The modelling needs to consider locations like Hartwood Forest and provide them with a level of protection.	noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003] . The modelling does not include or exclude locations, but significant effects are identified within a study area based on noise impact thresholds (see Section 16.5 of Chapter 16 of the Environmental Statement [REP1-003]).
3	Lilliana Liliana Busuioc, Ion Mihail Gorgoiu (residents of Caddington)	
a.	The house is located under the landing route effecting air quality. We understand financial and economic benefits, but we need to raise other impacts.	Chapter 7 Air Quality [AS-076] of the ES has provided an assessment of air quality impacts from all related sources (road vehicles, aircraft and airport sources) following the methodology agreed with the local councils. This includes relevant receptors in Caddington. The assessment concludes that the impact of the Proposed Development would be not significant for the assessment years assessed.
b.	There needs to be balance, increasing air traffic and the effects on life and wellbeing.	Please see Applicants response at 3(a), with regards to air quality. The impact of noise from the Proposed Development on health and quality of life has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in

Ref	Summary of comments made at OFH2	Applicant's response
		<p>Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>An assessment of the impact on health and communities, including an assessment of sleep disturbance, has been undertaken and reported in Chapter 13 Health and Community of the Environmental Statement [APP-039]. This assessment inherently considers impacts and results of the assessment in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>
c.	Noise pollution is difficult to cope with as flights are heard up to 03:00 and a medical condition makes the noise impacts worse.	<p>The impact of daytime and night-time noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>The Noise Envelope (see Green Controlled Growth Explanatory Note [APP-217]) contains a legally binding framework of daytime and night-time noise contour area Limits and the Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the Draft Development Consent Order [AS-067].</p> <p>The Applicant is also proposing a substantial extension of the current noise insulation scheme, including the</p>

Ref	Summary of comments made at OFH2	Applicant's response
		<p>addition of schemes which will provide the full cost of insulation for habitable rooms in eligible properties exposed above the daytime and night-time Significant Observed Adverse Effect Level (SOAEL). See Draft Compensation Policies Measures and Community First [AS-128] for further details including eligibility details.</p> <p>Section 2 of the document sets out proposed statutory compensation available for those who do not have their property acquired but where physical effects from the Proposed Development may result in a diminution in value.</p>
d.	Queries over how Luton Airport is planning to reduce Carbon emissions.	An assessment of changes to greenhouse gases due to the Proposed Development is provided in the Environmental Statement Chapter 12 Greenhouse Gases [APP-038]. This includes mitigation measures.
4	Harvey Dean (resident of Flamstead)	
	Incremental increases in air traffic worsens quality of life. Residents have repeatedly complained. As a result less residents are engaging with this enquiry.	<p>Please see Applicants response at 3(a), with regards to air quality and 3(b) with regards to noise.</p> <p>Chapter 13 Health and Community [AS-078] of the Environmental Statement reports the findings of an assessment of the effect on health and communities potentially impacted by the Proposed Development.</p>

Ref	Summary of comments made at OFH2	Applicant's response
	The right to enjoy holidays and recreational benefits that come as a result of flying do not trump the right to quiet enjoyment of someone's home.	A full Environmental Impact Assessment has been undertaken and the effects are reported in the Environmental Statement (ES) [APP-029 to APP-172] (as amended), including noise and health effects. The ES is a set of factual documents that report predicted effects, both adverse and beneficial, so that all can be considered by the ExA in planning decisions.
	As a result of climate change, popular holiday destinations will be less appealing decreasing the need of the Airport.	If consumer preferences change, there will still be demand for holidays although the precise destinations may vary. These factors are taken into account in the future demand forecasts as fully explained in Section 6 of the Need Case [AS-125] .
	Compliance with Net Zero carbon emission targets with the expansion will not be achievable.	An assessment of changes to greenhouse gases due to the Proposed Development is provided in the Environmental Statement Chapter 12 Greenhouse Gases [APP-038] . This includes an assessment of the Proposed Development's alignment with the UK's trajectory to net zero, including the UK Government's Jet Zero Strategy, concluding that the Proposed Development are in line with the strategy, and emissions are not so significant that they have a material impact the Government's ability to meet its carbon reduction targets, including carbon budgets.

Ref	Summary of comments made at OFH2	Applicant's response
	The Royal Society report concludes that for aviation, there is currently no credible alternative to fossil fuel.	The Government consulted on a sustainable aviation fuel (SAF) mandate for the UK in 2023. Recently (September 2023) the government announced continued commitment and support to developing a UK SAF industry including publishing a delivery plan for designing and implementing a revenue certainty mechanism for SAF (www.gov.uk).
	Airport Expansion applications overestimate the job creation potential of their proposal. Additionally, it's not just the number of jobs that matters but their socio economic distribution, according to reports by Oxford Economics airports do not lead to higher incomes; higher paid staff directly employed by the airport do not live within Luton whereas those who are paid a lower wage do.	Airport expansion creates jobs at a variety of skill levels. As shown in Figure 10 of Appendix 11.1 to the Environmental Statement [APP-079] , jobs at the airport tend to be higher wage than the average in the local economy. The Employment and Training Strategy [APP-215] sets out the steps that will be taken to ensure that jobs go to those who need them.
	A distinction should be made between adequate and effective mitigation measures. More effective and suitable measures would curtail aviation until carbon free aviation is available, we should perform a more localised GCG strategy.	<p>The Applicant considers that the issue raised regarding the carbon emissions from aviation was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] pages 87-88, in response to a number of Relevant Representations on this subject.</p> <p>It is unclear what a "more localised GCG strategy" refers to. Green Controlled Growth (GCG) has been developed to place Luton Rising's commitment to environmental sustainability at the very centre of the expansion proposals and is considered to be one of the most far-reaching commitments to managing environmental effects ever voluntarily put forward by a UK airport. It</p>

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		includes Limits to monitor and control the environmental impacts experience by local communities, including air quality, aircraft noise and surface access.
	We should look at other options that pertain to higher paid employment	As shown in Appendix 11.1 to the Environmental Statement (ES) [APP-079] shows that jobs at the airport tend to be higher paid than the average in the local area.
5	Julian Gannon (St Albans Resident)	
a.	<p>The Applicant's ES details that although there will be an increase in Co2 emissions as a result of the expansion of Luton Airport, they are so insignificant that they can be ignored.</p> <p>Any increase in emissions would be considered significant especially considering the Committee on Climate Change has stated that the government was at risk of delivering its six carbon budget, and the recommendation that no new airport expansion should be allowed until a strategy for reducing aircraft emissions is in operation. An increase of one million tonnes of Co2 is a significant increase.</p>	<p>An assessment of changes to greenhouse gases due to the Proposed Development is provided in the Environmental Statement Chapter 12 Greenhouse Gases [APP-038]. The outcome of the assessment is that the significance of the Proposed Development on the climate would be minor adverse and not significant.</p> <p>Regarding the CCC point, refer to response to 2a.</p>
b.	<p>The Applicants argument that future strategies (being sustainable aviation fuel (SAF), food, fuel efficiency and fuel use and carbon trading) to reduce Co2 emissions by 72% in operation by 2025 holds little evidence.</p> <p>The Royal Society calculated that if the UK were to use SAF to fuel their planes, half of the land used for</p>	<p>The assumption that all SAF would be generated by growing biomass specifically for jet fuel manufacture on land currently used for food production therefore taking it out of food production, is not correct. The government clearly outlines potentially eligible feedstocks in documents related to the SAF mandate (www.gov.uk), including captured carbon dioxide and various wastes.</p>

Ref	Summary of comments made at OFH2	Applicant's response
	agriculture would have to be set aside for its production.	
c.	Should we be using our scarce resources to allow 10% of the population, who accounted for 50% of all flights to fly even more frequently, when 50% of the population did not take a single flight last year.	<p>The source of the data relating to the proportion of people who fly is not stated but the Applicant believes that the source may be the work of the New Economics Foundation <i>Managing aviation passenger demand with a frequent flyer levy</i> published in 2015 based on data covering the period 2002-2010 from the National Travel Survey.</p> <p>Whilst this survey notes how many people take a trip by air in any given year, it does not consider how many people when taken over a longer time period.</p> <p>In any event, the Government is clear about the consumer benefits of flying - see page 60 of <i>Flightpath to the Future</i> (Department for Transport May 2022) which makes clear that there are strong consumer benefits from air connectivity.</p>
d.	The Committee for Climate Change states that offsetting shouldn't be included in any Net Zero policy.	Noted. The application is in accordance with the Jet Zero Strategy. The GHG assessment set out in Chapter 12 of the Environmental Statement [APP-038] assumes that the UK Government will deliver on the mitigation measures described in the High Ambition scenario of the Jet Zero Strategy. This scenario represents current government policy, so it is

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		<p>reasonable to embed these assumptions into the assessment.</p> <p>As described in the ES chapter, there are market-based measures including CORSIA and the UK ETS that will act as controls on aviation emissions should these mitigation measures not be delivered as projected by the UK Government.</p> <p>Ultimately, it is the responsibility of the government to implement policies that will achieve the UK's legally binding net zero target for 2050 and the limits set by the carbon budgets that have been ratified by parliament.</p>
e.	Aviation accounts for a third of the 80 million tonnes of Co2 emitted from industries that cannot decarbonise.	Noted.
6	Steve Gent (South Luton resident)	
a.	Noise disturbance as a result of continuous flying is an issue (especially considering the disturbance at night time hours). The house is double glazed and recently constructed. During the summer windows need to be open, and it is difficult to have conversations in the garden.	<p>The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>The Noise Envelope (refer to Green Controlled Growth (GCG) Explanatory Note [APP-217]) contains a legally binding framework of daytime and night-time noise</p>

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		<p>contour area Limits and the Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the Draft Development Consent Order [AS-067].</p> <p>Noise insulation is the last resort in the mitigation hierarchy, as set out in Section 2 of Appendix 16.2 Operational Noise Management (Explanatory Note) [APP-111] of the Environmental Statement (ES). The hierarchy therefore starts with mitigation at source and mitigation by intervention (which benefit both indoor and outdoor exposure) before mitigation by compensation (noise insulation) is provided. The noise insulation packages will include suitable ventilation if required to allow windows to be kept closed.</p>
b.	Noise monitoring records noise in excess of 80 decibels.	<p>Noted.</p> <p>No further details have been provided on the location of the monitoring or the noise metric being reported. It is not uncommon for L_{Amax} levels greater than 80dB to be recorded by airport noise monitoring terminals, and this has been taken into account in the validation of the noise model (see Section 6 of Appendix 16.1 of the Environmental Statement [AS-096]) used in the noise assessment presented in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>

Ref	Summary of comments made at OFH2	Applicant's response
c.	Impossible to identify which individual property fall within which noise contour bands.	The Applicant has confirmed in response to action points from the Open Floor Hearing that an online compensation look-up tool will be made available post consent to assist with this [REP1-001] . The contour plans provided in the Draft Compensation Policies, Measures and Community First [AS-128] are indicative only at this stage in the process.
d.	Maps provided at consultation events are so high level and low resolution meaning they don't illustrate well. maps provided at consultation events are so high level and low resolution	See response to 6(c).
e.	Applicant stated they would make available the compensation look up tool that determines whether residents are eligible to make a claim on the Applicant's website prior to submission of the DCO, but this has not happened.	See response to 6(c).
f.	The noise insulation scheme restricts you to one provider who does not offer triple glazing and the limited funding in any event would not cover this. The Applicant have said they are going to expand the scheme but have not provided further detail.	<p>This comment is made in relation to the current noise insulation scheme. Should development consent be granted, an enhanced noise insulation scheme would be introduced, and an appropriate number of contractors procured to meet the higher demand and more extensive insulation offer.</p> <p>Full details are with tiered schemes based on noise exposure with increased monetary contributions (up to the full cost of the insulation package). Full details are provided in Draft Compensation Policies Measures and Community First [AS-128].</p>

Ref	Summary of comments made at OFH2	Applicant's response
g.	The Applicant has said they would provide additional data in relation to the contour bands and data on individual properties.	See response to 6(c).
7	John Hale (a parish councillor for scientific parish in north of St. Albans)	
a.	In 2013 the residents were told that the implementation of RNAV would mitigate for any growth in passengers, which has not happened.	<p>Changes to airspace and flightpaths (including the introduction of RNAV) are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment and consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course.</p> <p>A note explaining the relationship between the two processes was submitted at Deadline 1 [REP1-028].</p>
b.	The airport has not delivered on any plans to not modify the use of airspace to reduce the impact of the airport, from the neighbouring communities following the introduction of RNAV making the application premature.	See response to 7(a).
c.	In 2013 residents were told the airport could get flightpaths higher in the air etc. to mitigate noise, this has not happened.	See response to 7(a).
d.	Economic benefit and grants: every organization that had been suggested to apply to the scheme has not been successful with their application. This is a smoke screen.	This is a misconception. The Applicant set up a fund explicitly for organisation based outside of Luton (the Near Neighbour Fund), in neighbouring authority areas. To date in excess of £700,000 has been awarded in

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		<p>grant from that fund since it was established. The Applicant's community funding programme is administered by Bedfordshire and Luton Community Foundation (BLCF).</p> <p>The Applicant notes that it is advised by BLCF that the Near Neighbour Fund has been heavily oversubscribed in the current year and in the previous 2 years.</p>
e.	Reopening factories that have been closed should be prioritised and looked at to diversify economy rather than putting all eggs in one basket and relying on the Airport expansion.	Please see Applicant's response at 1(k).
8	Jane Stanley	
a.	Property is a newbuild with insulation but noise continues to be problematic. The house is located near Memorial Park and the planes fly at about 2,000 feet. There are two or three major airports that use the same flight path.	Please see Applicants response at 3(c).
b.	The lounge at Luton airport was heaving, it cannot support more passengers. The passenger limit has already been exceeded.	The Proposed Development includes expansion of passenger facilities at the airport, initially in Terminal 1 then through the provision of a second Terminal. These facilities are designed to relevant industry customer service standards and enable more passenger demand to be met.
c.	Consideration should be taken of the recent wildfires, reduction in trees, increase in Co2 and Climate Change Committee does not want any new airports to	See response to 2(a).

Ref	Summary of comments made at OFH2	Applicant's response
	be built. A report in the local paper has been published.	
9	Simon Bowes-Lyon (resident impacted by flight path to the east of the airport)	
a.	Consideration should be given to the aesthetic factors and intimate landscape quality which attracts many visitors, walkers, bicyclists, or other recreations from the surrounding towns showing this area is also beneficial to the surrounding areas.	Noted. Any effects on landscape and visual receptors, including landscape character, consideration of tranquillity, and users of Public Rights of Way have been assessed and reported in Chapter 14 Landscape and Visual of the Environmental Statement [AS-079] and supporting appendices.
b.	The area in question includes the grade one listed early 18th century landscape gardens of St. Paul's Walden Bury. The expansion will not physically destroy this but it will reduce its value as it will be less desirable to live in and visit.	Potential impacts upon the heritage interests and value of St Paul's Walden Bury Grade I listed registered park and garden, and associated landscaped park, including potential impacts arising from aviation noise, have been assessed. There would be no physical impacts to the park, or to heritage assets within the park, and the noise change contours during operation show a negligible change to the park's noise environment, resulting in no effect to the assets' heritage values. Further details can be found in Chapter 10 Cultural Heritage of the Environmental Statement [AS-077] .
c.	Consideration needs to be given to the loss of public amenity, damage to a cultural site, reduction in property values, damage to local businesses near the flight path. These need to be set off against the speculative gain from a development.	The Environmental Statement at Chapter 13 Health and Community [APP-039] includes an assessment of the potential impact of the Proposed Development on the community including changes to the amenity of communities and community resources. Details of any

Ref	Summary of comments made at OFH2	Applicant's response
		<p>significant community effects are provided in Section 13.9.</p> <p>Potential impacts upon the heritage interests and value of St Paul's Walden Bury Grade I listed registered park and garden, and associated landscaped park, including potential impacts arising from aviation noise, have been assessed.</p> <p>There would be no physical impacts to the park, or to heritage assets within the park, and the noise change contours during operation show a negligible change to the park's noise environment, resulting in no effect to the assets' heritage values. Further details can be found in Chapter 10 Cultural Heritage of the Environmental Statement [AS-077].</p>
d.	Residents do not benefit for Luton airport.	There are substantial benefits to Luton residents as set out in Section 8 of the Need Case [AS-125] .
10	Joseph Kelly (resident, lives two miles from the airport close to the eastern flightpath)	
a.	Noise (even with closed windows) causes disturbance.	Please see Applicants response at 3(c).
b.	Smell of kerosene from flights is an issue.	The Applicant considers that the issue raised regarding the odour impacts (including kerosene smells), was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 9, in response to RR-06277 and others. No

Ref	Summary of comments made at OFH2	Applicant's response
		significant impacts have been predicted in relation to odour effects.
c.	Compensation is discretionary, the garden is within the noise contours but the house is not and so does not qualify for compensation. Residents have to be very close to the runway to qualify. If all of the impacted residents were included in the scheme, the Project would not be economically viable.	It is not the case that insulation is limited to those living very close to the runway. For example, indicative noise insulation scheme extents for 2027 shown in Figure A1.1 of Draft Compensation Policies, Measures and Community First - Appendix A (Part 1 of 2) [AS-126] demonstrate the schemes extend to approximately 9km to the east of the runway end and approximately 5-7km to the west/southwest of the runway end.
d.	Question authenticity of charities support as they may be supporting due to fear of removal of funding.	Please see Applicant's response at 1(h)(f).
	Simon Bowes-Lyon on behalf of Caroline Bowes-Lyon (business owner)	
a.	The noise from the aircraft curtails the offering of the business as a wedding venue, conference hall and film set.	The impact of noise from the Proposed Development on noise sensitive businesses has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003] .
b.	Parking on Whitwell High street is also impacted, creating issues for those that hire the venue.	The Applicant will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring. There is an opportunity through this process to identify any impacts that are being realised in future and seek to investigate the potential implementation of traffic management and/or parking control measures where appropriate.

3 A summary of the Applicant's responses to action point's arising from OFH2:

Examining Authority Action Point	Applicant's Response
Confirm status of compensation look up tool that determines whether residents are eligible to make a claim.	Refer to response submitted at Deadline 1.
Applicant to clarify if someone has already benefited from the noise insulation scheme whether this would debar new claims.	Refer to response submitted at Deadline 1.

4 Next steps and closing

The Applicant did not make any comments under this Agenda item.