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London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

8.39 Applicant's Response to Written Representations made by Members of the public at Deadline 1 (Part 1b)

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.39

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.39 Applicant's Response to Written Representations made by
Members of the public at Deadline 1 (Part 1b)**

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3. RESPONSE TO WRITTEN REPRESENTATIONS MADE BY MEMBERS OF THE PUBLIC AND BUSINESSES, PRESENTED AS VERBATIM TEXT TAKEN FROM THE WRITTEN REPRESENTATIONS ON A TOPIC-BY-TOPIC BASIS

3.1.1 This section provides the Applicant's response to Written Representations by members of the public/businesses which have raised matters that are more specific in nature and where the Applicant considers that the Written Representation required a detailed individual response.

Table 3.1: Response to Written Representations made by Members of the public and businesses

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
Richard Choppin	Planning	<p>This submission is to comment on the oral representation, made by Mr. Tim North of Tim North & Associates Ltd, at OFH 1 on the 10th August 2023. Mr. North refers to an off airport car park operating without planning permission and without a certificate of lawfulness.</p> <p>This car park is located on Vauxhall Way and is in fact operated by his client (Airparks), contrary to the fact he mentioned Airparks operated at no other sites in Luton other than Slip End. At the public inquiry for the 19m ppa planning application, I made representations regarding the lawfulness of this off airport car park. It would appear that Luton Borough Council is turning a blind eye to its unlawful use and in doing so has lost control of planning enforcement of off airport parking. You cannot ignore one and then enforce on others. Many other companies are now operating off airport parking at sites in the town, in</p>	<p>This is a matter for Luton Borough Council as local planning authority to consider and is not subject to this DCO application.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		places such as the NCP car park, Power Court and Crescent Rd to name a few. It is quite probable that unlawful off airport parking capacity in Luton, now exceeds that of on airport long term capacity.	
Richard Choppin	Surface Access	With airport parking now left so uncontrolled, how can any 'Sustainable Travel Plan' by the Operator/Applicant, both presently and in the future, possibly be fit for purpose?	The Applicant has submitted a Framework Travel Plan (FTP) [AS-131] which sets out the monitoring approach to be taken, with a toolbox consisting of interventions and measures that the operator can draw upon and scale up or down as and when required. The toolbox would be deployed flexibly to respond to changing circumstances and the results of ongoing monitoring and stakeholder feedback and achieve Limits and Targets. There are multiple interventions associated with the priority areas, which comprise the Applicant's surface access toolbox. This longlist is contained in the FTP [AS-131] . The vision and objectives of the SAS have been identified to capture the surface access Limits and Targets that underpin the strategy.
Stephen Pentland	Planning	The question that actually matters in a democracy is how do the proposed changes impact CITIZENS, and how does the Planning	The impacts of the Proposed Development have been thoroughly and robustly assessed in accordance with the relevant legislation and

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		<p>Inspectorate safeguard the rights of UK citizens under law to enjoy peaceful rights to their private property and place of residence, in the face of private investors in Luton Airport intent on advancing their self-serving interest in maximising shareholders' returns at any cost.</p>	<p>guidelines and are being mitigated as far as reasonably practicable.</p> <p>The application for development consent is now being examined by Inspectors appointed by the Planning Inspectorate through consideration of written submissions and oral submissions that will be heard during hearings. Members of the public have been, and will continue to be, invited by the Planning Inspectorate to participate in the examination in order that they can express their views and opinions to the Inspectors.</p> <p>In reaching its recommendation to the Secretary of State, the Planning Inspectorate (as Examining Authority) will be required to balance the benefits of the Proposed Development against the residual impacts.</p>
Stephen Pentland	Flightpath	<p>It simply isn't acceptable for the various UK public and pseudo-public bodies, airports and airlines - collectively responsible for airspace modernisation - to point fingers at each other and protest that no organisation can make headway on its own, least of all, those funded by taxpayers. Organisations need to</p>	<p>The Department for Transport has provided funding to support the airspace modernisation programme and a complex coordination task is underway as set out in the Airspace Modernisation Masterplan.</p>

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		be taken to task, once and for all, by the Transport Secretary.	
Stephen Pentland	Noise and Vibration	In the meantime, the Government must also task the CAA, NATS and Luton Airport to attend to a number of critical areas that require remedial attention, and which collectively would help reverse the noise impact on Herfordshire communities resulting from the aggressive expansion of Luton airport over the last 5 years."	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 [AS-080] .
Cherry Newbery	DCO Management Team	I would also refer you to the Audit and Governance Committee Meeting of LBC held on 20th July 2023 (this can be found on the CMIS calendar for LBC) and in particular the draft audit report for Luton Borough Council for year ended 31st March 2019 by Ernst and Young commencing at page 172 - I am only a ordinary resident with no accountancy experience, but being involved in trying to save my local Wandon Park from being built on, I do try to follow the council meetings. I was very concerned on reading the report and worried for our future here in Luton. It may be that this report has already been brought to your attention.	Noted.
Joseph Kelly	Compensation	In addition, the airport has not fulfilled promises made as part of previous expansions to wider the	There is an existing noise insulation scheme which is run by the existing airport operator.

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		<p>noise contours and expand funding – neither has happened. There is a sole contractor engaged to instal the installation and he has confidentially admitted to a neighbour that is does not work in any event and of course does nothing to tackle air-pollution. The airport also incorrectly terms this scheme as “financial compensation” in both this and previous expansion proposals – this is clearly misleading and highlights the whole scheme is just a marketing and tick box project and unfortunately is another reason why the integrity of Luton Rising cannot be relied upon.</p>	<p>This application contains a new Noise Insultation Policy which expands on the current scheme. See Draft Compensation Polices, Measures and Community First [AS-128]. Neither the current nor proposed policy refer to ‘financial compensation’ and specifically make the point that the policies are about providing noise insulation without a cash alternative.</p>
Joseph Kelly	Compensation	<p>Clearly I prefer these plans not to proceed but if these plans do go ahead the airport has to award financial compensation for those residents directly impacted. The proposals though for compensation are drawn very tightly and basically you have to be very close to the runway to qualify and the airport has therefore effectively deemed that no compensation is payable. If the true impact on residents of this and previous expansions included adequate financial compensation, I am sure that these proposals would not be economically viable.</p>	<p>The proposed new noise insulation policy (See Draft Compensation Polices, Measures and Community First [AS-128]) includes more properties than the existing policy and by comparison with other similar policies offered at other UK airports is regarded as industry leading. In addition, and in circumstances where residents believe the value of their properties is being impacted by the construction or operation of the Proposed Development there is a statutory entitlement to claim compensation. This is provided under Section 10 of the Compulsory Purchase Act 1965 and Part I of the Land Compensation Act 1973, neither include geographical limits. See Draft Compensation</p>

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			Polices, Measures and Community First [AS-128].
Joseph Kelly	Compensation	I note also that substantial housing development is planned at Tea Green, a short distance from the airport and this will also be blighted There is precedent of compensation being paid to residents impacted by other airport expansions and I don't see how the airport is effectively able to deem that none is necessary. I am currently investigating class actions in this regard but this should not be necessary if LR had fair compensation proposals. If successful these costs will be substantial to LR (which of course if why they are being ignored) and may change the viability of the proposed expansion.	The Applicant is aware of the housing development being planned at Tea Green and has been in dialogue with the developers. Both proposals are being progressed in parallel and are expected to be delivered in accordance with the published plans. The Applicant is aware of its commitment to meet statutory compensation claims arising as a result of the Proposed Development and has actively signposted residents to literature which explains how claims might be made. See Draft Compensation Polices, Measures and Community First [AS-128].
Joseph Kelly	Need Case	The airport references sharing the benefits with local residents – it is interesting to hear from local charities in Luton, I am myself a Lutonian and I don't doubt the significant needs of those charities but I cannot say whether they are speaking at their own behest and/or in fear of that funding being withdrawn but I regret that I am not aware of any significant sharing of benefits for those in need outside of Luton, particularly in those villages directly impacted in Hertfordshire at	The Applicant has provided circa £180m of funding to local good causes via various different Community Funds. One such fund is the Near Neighbour Fund which is exclusively for distribution outside of the boundary of the borough of Luton and includes communities in Central Bedfordshire, Hertfordshire and Buckinghamshire. Notwithstanding this, through the proposed Community First fund, up to £5.6m per year would be made available exclusively to

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		<p>Markyate, Flamsted, Breachwood Green, Bendish, Whitwell and Caddington. I also find it surprising that charities generally oppose global warming but due to their significant funding needs they have to take funding from the airport. It cannot be right that the Luton Major (who is also a director of Luton Airport) was seen briefing certain charities before the hearings, I cannot say if this was to encourage support in favour of LR but I can only conclude that some or all of these charities are not necessarily supporting the expansion of their own volition and would encourage the Inspectorate to ensure there is independence and objectivity here and to also consider whether benefits do accrue to the wider community outside of Luton (and where much of the detrimental impact arises). I am aware of only one grant to charities based in Hertfordshire was £1500 paid to fund noise monitoring at Kings Walden. The lack of independence from Luton Council is well documented of course. I also highlight that charitable donations by LR actually fell 11% in 2022 despite a substantial increase in turnover</p>	<p>organisations in local authority areas other than Luton.</p> <p>The Applicant strongly refutes the insinuation that any organisation (charitable or otherwise) has in any way been co-erced into providing active support for its application. If the respondent feels this not to be the case, then they are invited to provide specific details.</p>

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Geoffrey Kenneth Rochester	Air Quality Climate Change	They appear to be denying in advance any responsibility for air pollution, including carbon dioxide emission, from the additional aircraft. This is not logical.	<p>The Applicant considers that the issue raised regarding the negative impacts on air quality was answered in the Response to Relevant Representations Part 1 of 4 Air Quality [REP1-020] page 4, in response to RR-1441 and others.</p> <p>Chapter 12 Greenhouse Gases of the Environmental Statement [APP-038] assesses the impact of GHG emissions from additional air traffic movements from the Proposed Development.</p>
Geoffrey Kenneth Rochester	Climate Change Air Quality Energy	Expansion will draw more electricity from the hard-pressed National Grid, especially if airport vehicles are EVs. This will increase carbon dioxide emission nationally. Buying Renewables Certificates does not increase the supply of Renewable Energy.	The Proposed Development will draw power from the grid to supplement onsite or near to site generation in meeting demand. UK Power Networks (UKPN) are the statutory undertaker for electricity supply in London, the South East and the East of England and are responsible for the provision of power in the Luton area. The Proposed Development includes on-site energy generation and battery storage to reduce reliance on the grid and better manage peaks in demand on the airport as explained within the Energy Statement [APP-050] .
Geoffrey Kenneth Rochester	Surface Access	Replace all port vehicles with EVs.	The Framework Travel Plan [AS-131] contains multiple interventions associated with the adoption of EVs and provision of charging infrastructure,

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			<p>which make up components of the Applicant's surface access toolbox.</p> <p>This longlist is contained in the FTP [AS-131] Section 5.2, Table 5.4.</p> <p>It is also proposed in the Framework Travel Plan [AS-131], Table 4.1 that the Applicant sets out monitoring targets for the number of EV charging points and utilisation (number of vehicles which can be charged and utilisation of charging points) to focus attention on the delivery of the EV charging infrastructure in the airport for staff and passengers to improve utilisation and satisfy demand. This would be administered by the Travel Plan Co-ordinator</p> <p>Table 4 of the Outline Greenhouse Gas Action Plan submitted as part of the Environmental Statement [APP-081] describes mitigation measures relating to Airport Operations, and includes a commitment that:</p> <p><i>"All airside vehicles will be zero emissions (including Ground Support Equipment (GSE), tugs, buses etc) where electric or other zero emission option, where versions are available for the vehicle type", with a target date of 2035.</i></p>

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Geoffrey Kenneth Rochester	Climate Change	Set out a detailed plan with annual milestones, explaining how it intends to achieve zero carbon dioxide emissions by 2050, for example by specifying that after that date all buses serving the airport must be battery or fuel cell driven, all cars using the car parks must be EVs, and no fossil fuel will be available for refueling aircraft.	<p>Section 4 of Appendix 12.1 Outline Greenhouse Gas Action Plan [APP-081] summarises the proposed mitigation actions and commitments that will allow the Proposed Development to be delivered and the airport operated in accordance with emissions reduction targets and contribute to the UK's target of net zero emissions by 2050.</p> <p>Should the DCO be granted, a further, more detailed, Greenhouse Gas Action Plan, which must be substantially in accordance with this Plan, will be developed by the airport operator to provide further information around mitigation measures and targets going forward</p> <p>Paragraph 1.3.2 of Appendix 12.1 Outline Greenhouse Gas Action Plan [APP-081] describes how the detailed Action Plan will be reviewed and refreshed periodically (in line with UK Government carbon budget periods) and will set out how emissions across all aspects of aircraft movements, airport operations and surface access will be monitored, reported and managed in line with existing legislation, policies and targets.</p>
Jia Cheng Zhou	Compensation Noise and Vibration	I am currently live in an apartment in Luton town centre area. Here are my several opinions	An assessment of construction and operational vibration has been undertaken and is presented in Chapter 16 Noise and Vibration of the

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	Design/Engineering	<p>about the London Luton Airport Expansion. The airport expansion represents more frequent aircraft take-offs. And the vibrations caused by aircraft take-offs can have varying effects on building structures. Following are some examples:</p> <ol style="list-style-type: none"> 1. Cracks in Walls and Ceilings: The repeated vibrations from aircraft take-offs can lead to cracks in walls and ceilings. These cracks may start small but could widen over time due to the cumulative effect of vibrations. There are some cracks appears on my apartment ceiling already. 2. Loosening of Building Components: Vibrations can cause screws, bolts, and other fasteners to gradually loosen, potentially compromising the structural integrity of the building. 3. Settlement and Foundation Issues: Intense vibrations can lead to differential settlement of the building's foundation. This 	<p>Environmental Statement [AS-080]. The assessment concludes there are no significant effects from construction or operational vibration on buildings or their occupants from any source associated with the airport.</p> <p>It should be noted that levels of vibration required to result in cosmetic or structural damage to buildings are orders of magnitude higher than levels of vibration that may be perceptible or disturbing to humans. For example, British Standard 5228-2 (Ref 3.1) notes that vibration may be just perceptible in residential environments at 0.3 mms^{-1} (peak particle velocity) and may cause complaint, but can be tolerated, at 1.0 mms^{-1}.</p> <p>By contrast cosmetic damage in residential buildings can occur above 15.0 mms^{-1}, minor damage above 30.0 mms^{-1} and major damage above 60.0 mms^{-1}.</p> <p>These levels of vibration are substantially higher than any levels anticipated to be experienced in residential developments from aircraft or any other source of vibration. This is consistent with the conclusions of the assessment in Chapter 16 Noise and Vibration of the Environmental Statement [AS-080] which concludes that there are no</p>

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		<p>can result in uneven settling of the structure, leading to problems such as tilting floors and misaligned doors and windows.</p> <p>4. Deterioration of Materials: Continuous vibrations can accelerate the wear and tear of building materials, especially in areas where materials are joined or connected. This can lead to premature deterioration and necessitate more frequent maintenance in the future.</p> <p>5. Disruption of Building Occupants: Vibrations can cause discomfort to the building's occupants, leading to a less desirable living or working environment. It might affect concentration, sleep quality, and overall well-being.</p> <p>6. Structural Fatigue: Over time, the constant vibrations can contribute to structural fatigue in certain building components, particularly those sensitive to dynamic loading. This can</p>	<p>significant effects from construction or operational vibration on buildings or their occupants from any source.</p> <p>Potential impact on market value of properties due to the physical effects of the Proposed Development may be the subject of a claim for compensation. These may include injurious affection caused by construction works under Section 10 Compulsory Purchase Act 1965 (Ref 3.2) and reduction in property value under Part I of the Land Compensation Act 1973 (Ref 3.3).</p> <p><u>See also the Applicant's Draft Compensation Polices, Measures and Community First [AS-128] submitted as part of the application.</u></p>

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		<p>potentially reduce the building's overall lifespan.</p> <p>7. Noise Transmission: Vibrations from aircraft take-offs can also transmit noise through the building's structure, making the interior environment noisier and less peaceful.</p> <p>8. Safety Concerns: In extreme cases, excessive vibrations from frequent aircraft takeoffs could pose safety risks if the existing building's structural integrity is compromised. This might lead to evacuation or even the need for structural repairs.</p> <p>9. Aesthetics: Vibrations can contribute to wear and tear on the building's exterior, potentially affecting its visual appeal and requiring more frequent maintenance and cleaning</p> <p>To mitigate the potential negative effects of aircraft take-off vibrations on building structures, engineers and architects may</p>	

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		employ various design strategies, such as incorporating vibration damping materials, adjusting building orientation, and implementing resilient building techniques for the new-build buildings. But what about the existing buildings? Who is going to cover the cost of maintenance or repair for the property owners of the existing buildings in the future? And poor condition of the property leads to lower market value. Are the property owners going to get compensation when they selling.	
Jia Cheng Zhou	Local Environment Design/Engineering	In addition, I believe the more airport take-offs may creating constant wind load to the building structures. Are the existing buildings such as my apartment building can tolerate that would be my question.	Aircraft jet wash does not create a constant wind load or increase the average wind load around an airport. The effect of aircraft jet wash is localised to the area immediately behind the aircraft and dissipates within the airport boundary.
Bartholomew Pleydell-Bouverie	Landscape Access	The proposed landscaping and access plot 6-06 is situated on my land ownership. This access route could be accommodated on	The Applicant considers that the issue raised regarding proposed access to this plot was answered within the Applicant's Response to Relevant Representations Part 2B of 4 (Members of

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		the adjacent existing right of way, which is situated on plots 6-07 and 6-05. By using the pre-existing track and route it would mean an additional field parcel does not need to be adversely affected by the scheme. This would result in reduced environmental and visual impact of the scheme and will reduce security and access issues	the Public) [REP1-022] page 60, in response to RR-0139.

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Roger Lovegrove	Surface Access	<p>I was surprised that no one mentioned the town 'Stevenage' in the proceedings. The eastern quadrant of Luton is bounded by the airport, Vauxhalls, substantial residential estates, 2100 new homes planned in the latest 'Local Plan' (LU1, 2 and 3), an area of countryside crisscrossed with minor roads but no A roads, and in the far east, Stevenage.</p> <p>Both Stevenage and Luton are large towns, both vying for city status, yet they will soon be only 5/6 miles apart with no direct infrastructure connections. I lived for 10 years in the 1970s between the airport and Vauxhalls and commuting to Stevenage, even then, was easier via the 10 miles of back lanes (via Tea Green and Preston) than taking the 15 mile route via the A505 to Hitchin, the back lanes of Hitchin and the A602 to Stevenage.</p> <p>There is no direct easterly 'A road' route out of the area and no northerly nor southerly A road routes. The westerly access is via the Airport/Vauxhalls rush hour bottlenecks.</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. 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>In addition, the Applicant and operator will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as set out within the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) (Appendix I of the Transport Assessment [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</p>

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			implementation of traffic management and/or parking control measures in rural areas, to dissuade vehicles from using these roads to access the airport.
Roger Lovegrove	Planning	The other point to note is that this area is in North Hertfordshire (LU1, 2 and 3) (not Bedfordshire) which means that neither Council is too concerned about the problems of the other. North Herts Council are not too concerned about the mess Luton Council is making of their town and surrounding area and Luton Council do not appear to care about infrastructure problems in North Herts.	The Applicant notes that all host authorities (Luton Borough Council, North Hertfordshire District Council, Central Bedfordshire Council, Dacorum Borough Council and Hertfordshire County Council) have been engaged in respect of the Proposed Development over several years. Much of the engagement has been undertaken with the authorities jointly, via the Planning Officers Coordination Group, which has facilitated discussion across the authorities on potential cross-boundary issues and other views in relation to the Proposed Development.
Roger Lovegrove	Surface Access	To expand the airport and build LU1,2 and 3, the local infrastructure needs substantial improvement. As a minimum, the dual carriageway from the M1 Exit 10 should be extended east to Exit 7 of the A1M via a tunnel under the airport runway. Additionally, a North South dual carriageway should be added from Hitchin down to Wheathampstead.	<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 traffic growth, together with growth associated with background traffic and consented developments.</p> <p>The traffic modelling undertaken as part of the Transport Assessment demonstrates that the proposed highway improvements would</p>

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			mitigate the traffic impacts from the Proposed Development.
Roger Lovegrove	Need Case	Reasons why future demand for flights may be well short of 32 million - Some Airports are more 'sustainable' than others. The public may be receptive to the idea of avoiding airports like Luton. Airports are not popular, not least because they extort money from passengers by way of drop off fees and expensive shops etc.	The competitive position between airports including the relative costs is taken into account in the passenger allocation model used to determine the share of the overall passenger market that would prefer to use London Luton Airport as described in Section 6 of the Need Case [AS-125] . Drop off charges apply at all of the major airports and many of the same shopping brands operate across competing airports.
Roger Lovegrove	Need Case	Reasons why future demand for flights may be well short of 32 million - There is growing demand for flying to be more fairly taxed. This could more than double the cost of flying and have a significant effect on numbers. This could be readily achieved by imposing a significantly higher APD (Air Passenger Duty).	The demand forecasts in the Need Case [AS-125] take into account the expected future increases in Air Passenger Duty and also include for the cost of carbon or its abatement, with the values increasing in time in line with the Government's target appraisal values.
Roger Lovegrove	Need Case	Reasons why future demand for flights may be well short of 32 million - Some countries, like Switzerland, are now banning internal flights. UK could do the same and would help popularise rail.	Currently, the UK Government has not signalled any intention to ban flights within the UK. Most domestic flights within the UK link Northern Ireland to England or link Scotland to the southern part of England, where rail journeys are either lengthy or not possible. Currently only around 8% of passengers at

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			the airport are travelling on such services, including to the Channel Islands.
Roger Lovegrove	Need Case	Reasons why future demand for flights may be well short of 32 million - Not Flying, perhaps made popular by TV celebrities and by the UK's own tourist industry, may succeed in discouraging flying. Some of the more extreme environmentalists may be even more successful eg by gluing themselves to runways.	There is currently no indication that the underlying demand for air travel is falling with recovery from the effects of the pandemic proceeding in line with the expectation that the overall market for air travel will reach 2019 levels again by 2024.
Roger Lovegrove	Need Case	Reasons why future demand for flights may be well short of 32 million - The Luton town council may fundamentally change its political make up and its policies in the light of public pressure to recognise climate change measures.	This is speculative and not a basis for decision making.
Mark Butterfield	Flightpath	We strongly believe that the airport will use their extremely vague planning application and statistics to lie to the local residents on any issue that suits them or their application and would not adhere to any requirements or regulations that they should or want to; such as flight paths etc (even though their solicitor claimed in the DCO meeting this wasn't part of the application, why else would he mention this first in his opening statement; they	As made clear in the Applicant's letter at Deadline 1 [REP-001] , the flight paths have not moved. The width of the Noise Preferential Route (NPR) is set by reference to the performance characteristics of aircraft and the requirement to ensure safe operations. The precise track of an individual aircraft within the defined Standard instrument Departure Routes (SIDs) (see Figure 6.28 of the Need Case [AS-125]) will vary dependent on the precise meteorological

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		<p>are already lying to all the local residents regarding why the flight paths have moved closer to the North side of the NPR and the South Luton area in particular with only private jets occasionally going up the South side of the NPR).</p>	<p>conditions at the time of operation as well as the load of the aircraft.</p>
<p>Alan Pearson</p>	<p>Need Case</p>	<p>As precedent please note that Croydon, Hendon, Radlett, Leavesden, Bovingdon, Panshanger and Hatfield airfields are all closed. On a similar basis there is little reason why the same should not happen to Luton Airport....Operations at Luton should be scaled back, not increased.</p>	<p>With the exception of Croydon Airport, which was replaced by Heathrow Airport as the main London Airport following the Second World War, the small airports referred to were handling general aviation with small aircraft only. They are not comparable to London Luton Airport.</p>
<p>Alan Pearson</p>	<p>Construction</p>	<p>St Albans planners insist that building works operate only M-F 07.30-18.00h and Sat 08.00-13.00h. Luton Airport's operations are completely out of step with this reasonable restriction which aims to preserve some measure of tranquility in the residential areas. Why is this permitted??</p>	<p>Working hours for 'building works' apply to construction not operation of an airport or any other business. The proposed working hours during construction of the Proposed Development are described in the Code of Construction Practice provided as Appendix 4.2 to the Environmental Statement [APP-049] which is secured as Requirement 8 of the draft DCO. This states: "<i>Core working hours will be from 08:00 to 18:00 on weekdays (excluding bank holidays) and from 08:00 to 13:00 on Saturdays.</i>" Similar to those quoted.</p>

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Richard Stubbs	GCG / Surface Access	<p>Surface access. The identified issue being addressed is 'Increased congestion on local and strategic road networks' The control measure proposed in GCG is the percentage travelling by unsustainable means. This measure does not address the issue of congestion, whether sustainable or unsustainable it's still congestion – there will be 14M more people travelling on local networks.</p>	<p>The application seeks to increase the proportion of trips which are made by sustainable modes. The application acknowledges that notwithstanding this, to meet the growth of the Airport there will be additional private vehicle trips and has developed mitigation to improve the capacity of the highway and to reduce congestion and delays as set out in the Transport Assessment [APP-203 to APP-206], which provides a significant amount of detail on surface access, including the proposed mitigation measures which are designed to accommodate airport related traffic growth.</p> <p>The traffic modelling undertaken as part of the Transport Assessment demonstrates that the proposed highway improvements would mitigate the traffic impacts from the Proposed Development.</p>
Richard Stubbs	GCG	<p>Environmental Scrutiny Group. Chair of the ESG will be chosen by the airport operator, this person also appoints the separate chairs of the 4 Technical Panels. There will be a further aviation expert member and a representative of the airline industry, all appointed by the airport operator. The other 4 members representing local authorities will be</p>	<p>As set out in the Draft ESG Terms of Reference [APP-219], the independent chair and two independent experts on the ESG will be appointed by the Secretary of State (paragraphs A2.1.7 and A2.1.8). The airport operator does not therefore appoint the members, only nominates candidates to be appointed.</p>

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		<p>senior planning professionals. There will be no community members. The airport operator will pay 'for the costs' of the chair of the ESG, the specialist in aviation on the ESG, the chairs of the 4 Technical Panels, and other admin costs of these groups. Does this describe an independent group who can represent communities blighted by this expansion or is it a group of paid consultants with a background in the aviation industry unwilling to challenge their Luton co-professionals?</p>	<p>The chairs of the technical panels will be appointed by the independent chair of the ESG (following their appointment by the Secretary of State), not the airport operator, as set out in paragraph B2.1.1 of the ESG Technical Panels Draft Terms of Reference [APP-220].</p> <p>As part of the GCG Framework, it is recognised that there must be a role for local communities to input into the GCG process, as it is the local communities who experience the greatest environmental effects associated with the airport. However, the members of ESG and the Technical Panels will be required to be planning professionals and technical specialists within the relevant environmental fields respectively, as is required to exercise their functions in an impartial manner. The requirement for independence in decision applies both to those in favour of growth and those who do not support the Proposed Development. Therefore, it is not considered appropriate for the general public to have membership of either body in a formal decision-making capacity. However, Section 2.5 of the GCG Explanatory Note [APP-217] sets out how the views of local communities will be</p>

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			<p>obtained and used to inform the decisions of the ESG.</p> <p>Overall, the proposed governance arrangements for the GCG Framework are considered to be suitable and robust to enable independent oversight of the implementation of the Proposed Development, as well as enabling local authorities and local communities to raise issues with the ESG.</p>
Richard Stubbs	GCG	<p>Control of environmental limits are exceeded. A very complex bureaucratic network of different groups, monitoring, re-measuring, re-monitoring, etc is described. The process of 7 months advanced selling of 'slots' giving landing rights to airlines is described. Any pause or control of growth would be a difficult and lengthy process. No standards of timeliness in delivering any pause in growth are given.</p>	<p>The defined processes and groups necessarily reflect the range of technical specialisms required across the four environmental topics. The monitoring proposals are considered necessary and robust.</p> <p>As set out in Section 1.8 of the GCG Explanatory Note [APP-217] the slot allocation process, including the timings referenced, are based on legislation that applies to all 'coordinated airports' in the UK, and is consistent with international legislation (i.e. European Union directives) and guidance (including the Worldwide Airport Slot Guidelines), that reflects the need for</p>

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			<p>consistent international standards and processes. The processes within GCG for controlling growth must align with these legislative requirements, and the length of time for implementing these controls (including modifications to capacity declarations and creating local rules) are clearly set out in Sections 2.3 and 2.6 of the GCG Explanatory Note [APP-217].</p>
Daisy Cooper MP	Climate Change	<p>Any increase in air transport capacity at one airport must therefore be matched or exceeded by a corresponding reduction at other airports, in order to meet the UK's commitment to achieving net zero carbon emissions by 2050.</p>	<p>Although the Committee on Climate Change has made recommendations that expansion of airport capacity should not be expanded, this position has not been accepted by Government as is made clear in the Government's response to the Committee on Climate Change's 2022 report to parliament of March 2023:</p> <p><i>#197 "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. Our 'high ambition' scenario has residual emissions of 19 MtCO2e in</i></p>

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			<p><i>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>
Daisy Cooper MP	Need Case	<p>Further, Luton's proposals should be viewed in the context of expansion plans by other airports across the country. In the London region alone: Heathrow intends to move forward with the construction of a new third runway, which could almost double their annual passenger capacity from around 80million today, to more than 140million on completion; Gatwick has consulted on bringing its emergency runway into regular use increasing capacity from 45million to 75million; and Stansted's approved upgrades are likely to result in an increase of passenger numbers from less than 30million to more than 40million.</p>	<p>As set out in the Need Case [AS-125], the demand forecasts for the airport have taken into account potential growth and expansion at other airports in the London area. A range of forecasts is presented taking into account these other development, recognising that there is no certainty that additional runway capacity will be provided at both Heathrow and Gatwick Airports over the timeframe of the proposed development.</p>

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Daisy Cooper MP	Need Case	<p>Claims by the airport of the economic benefits to our local communities of quality job creation have also been thoroughly debunked. Some economists have described the air transport sector as "one of the poorest job creators in the economy per pound of revenue."</p> <p>Unlike other sectors, productivity gains have led to a proportionate drop in the absolute number of people employed in the sector and have not resulted in an increase to salary levels. In fact, air transport wages have fallen in real terms over the last two decades. In the period between 2008 and 2022, for instance, air transport saw the largest real terms pay decline of any sector in the country.</p> <p>Economic benefits of improved air connectivity have also diminished since the turn of the century. The digital age, turbo charged by the necessities of the Covid pandemic, has resulted in virtual meetings taking the place of the short haul business routes available from Luton. Growth in business air travel effectively ceased in 2012, with a net decline expected in</p>	<p>This submission repeats arguments made by the New Economics Foundation, which are separately addressed in detail.</p> <p>The positive economic benefits within the local area are clearly set out in Section 8 of the Need Case [As-125].</p>

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		<p>such trips expected in the coming decades.</p> <p>Any growth in passenger numbers is therefore to be from recreational travel, from a comparatively wealthy minority who can afford to be frequent leisure travellers. This is while one in two UK residents either choose not to fly at all, or simply cannot afford to do so.</p> <p>The effect to the UK economy of increased air capacity from Luton will likely be negative overall, as domestic hospitality spending is routed abroad, and the number of inbound tourists to the UK expected to remain lower than pre pandemic and pre Brexit levels.</p>	
Daisy Cooper MP	Surface Access	<p>The airport operators acknowledge that the majority of surface access journeys to and from the airport are road traffic, and that their planned expansion would therefore increase the volume of traffic on both the local and strategic road network.</p> <p>Luton Rising's own pre consultation documents aim for only a modest uplift from 38% to 45% of their passengers expected to use public transport to access the airport.</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 traffic growth, together with growth associated with background traffic and consented developments. The traffic modelling undertaken as part of the Transport Assessment demonstrates that the proposed highway improvements would mitigate the traffic impacts from the Proposed Development.</p>

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		<p>Based on the operator's own assumptions, the number of passengers arriving by private car should the expansion plans go ahead would rise from around 11million per year in 2019, to more than 17million in 2050.</p> <p>The impacts of such a significant increase in traffic congestion are not just felt in the immediate vicinity of the airport. My constituency and the surrounding district of St Albans are likely to experience the knock on effects of such a dramatic increase in private car use to Luton Airport.</p> <p>It is essential that the local effects, and not just the aggregate numbers, are measured and limits imposed. Key routes across the catchment area should therefore be monitored by employing ANPR or similar technology in areas such as St Albans, to measure the increased traffic volumes – and critically expansion should be halted if serious deleterious effects are felt in any of the surrounding areas.</p>	<p>In addition, the Applicant and operator will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as set out within the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) (Appendix I of the Transport Assessment [APP-202]) and 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 in rural areas, in order to dissuade vehicles from using these roads to access the airport.</p>
Daisy Cooper MP	Surface Access / Noise	Road and occupational accidents are more likely in areas of high night time aircraft noise,	The impact of night-time noise from the Proposed Development has been assessed and all reasonably practicable measures have

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			<p>been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [AS-080].</p>
Daisy Cooper MP	Noise	<p>As an absolute minimum, no expansion at all should be allowed until and unless promises on noise reduction are fulfilled, and a demonstrably independent body is established to monitor and report on air noise targets.</p>	<p>The Applicant is committed to sharing the benefits of future technological improvements (in terms of aircraft noise reduction) between communities and industry. The benefit of the transition to 'new generation' aircraft (e.g. the Airbus 320Neo and 321Neo and the Boeing 737Max) in the early years of expansion (phase 1) will be shared with the community, with the Noise Envelope Limits to be set at commensurate levels to secure this. For the later years of expansion (phase 2 and onwards), The Noise Envelope includes a defined mechanism to share the noise reduction benefits of future technological improvements in aircraft between the airport and local communities. This would be controlled through a requirement to review the Limits and Thresholds in 5-year cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance known. See the Green Controlled Growth Explanatory Note [APP-217] for further information.</p>

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			<p>A key element of the legally binding Green Controlled Growth (GCG) framework secured through the DCO is independent oversight of environmental effects (including noise) associated with the operation of the airport. Section 2.4 of Green Controlled Growth Explanatory Note [APP-217] sets out how independent oversight of environmental effects associated with the operation of the airport will work, through the formation of the proposed Environmental Scrutiny Group and Noise Technical Panels. The GCG Framework is supported by a number of appendices, including Terms of Reference for the proposed Environmental Scrutiny Group (ESG) [APP-219] and Technical Panels [APP-220] as well as an Aircraft Noise Monitoring Plan [APP-221].</p>
Daisy Cooper MP	GCG	<p>It is of grave concern to me that the only right of appeal included in the GCG document is for the airport operator to the Secretary of State. No form of appeal appears to be available to local authorities, or local communities, whose lives are set to be disrupted should further expansion go ahead.</p> <p>Should the DCO be granted, and a condition attached for independent</p>	<p>It is not considered necessary for specific local communities or local authorities to have a right of appeal, as the only decisions they would be appealing are those taken by the independent Environmental Scrutiny Group (ESG).</p> <p>However, it is acknowledged that there must be a role for local communities to input into the GCG process. As such, it is proposed that as a requirement of the GCG process, public</p>

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		<p>monitoring and enforcement, this should be carried out by a truly independent body with no perceived financial interests in the commercial success of Luton Airport. It is clear that communities and elected representatives across the region have no confidence in Luton Council's ability to appear objective when considering imposing penalties on the enterprise responsible for a primary source of their revenue.</p>	<p>meetings will be required to be organised by the airport operator, in consultation with the Technical Panels, to provide the opportunity for the public to offer feedback relevant to the four environmental effects within the GCG Framework [APP-218] and the airport's performance against the associated Limits.</p> <p>The functioning of the ESG, as set out in the Draft ESG Terms of Reference [APP-219] requires that group to take account of public feedback when making decisions related to GCG, obtained through these public meetings (as set out in Section A4.6).</p> <p>The membership of the ESG includes four local authority members (only one of which is from Luton Borough Council), in addition to independent experts and an independent chair. There is no role proposed on the ESG for either Luton Rising as the airport owner, or for the airport operator. This body therefore has no financial interests in the commercial success of Luton Airport, and will be able to provide a rigorous level of independent oversight and scrutiny, and no decisions related to GCG can be made unilaterally by Luton Borough Council.</p>

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			<p>Furthermore, Section 2.7 of the Green Controlled Growth Explanatory Note [APP-217] also sets out the possible enforcement approaches, where the GCG Framework has not been complied with. This includes the option for any local authority to take enforcement action pursuant to Section 161 of the Planning Act 2008, including those where land under the DCO is not within their jurisdiction.</p> <p>In summary, there are considered to be sufficient and robust safeguards proposed to enable independent oversight of the implementation of the Proposed Development, that enables local authorities and local communities to raise issues with the ESG.</p>
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	Planning	Bloor Homes has an interest (by way of an option agreement) in land to the East of Luton. This land forms part of the land identified in North Hertfordshire's Local Plan 2011-2031 ("the NHDC Local Plan") as a strategic housing site (Local Plan Allocation SP8 and SP19) for a new neighbourhood of approximately 2,100 homes made up of three sites EL1, EL2 & EL3 (the East	Noted.

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		of Luton Strategic Housing Site). The extent of the allocation is shown in Figure 1 below: [Note - please see image in WR]	
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	Planning	<p>The London Luton Expansion DCO includes the compulsory acquisition of permanent rights in connection with hedgerow restoration and screening over plots 3-40, 3-42, 7- 13, 7-14, 7-40, 7-43 7-44 and 7-46 and these plots comprise land within the East of Luton Strategic Housing Site.</p> <p>These rights and restrictive covenants are included for compulsory acquisition in connection with scheduled work number 5e, namely: "Off-site Hedgerow Restoration and Screening.</p>	Noted.
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	Planning	<p>The East of Luton Strategic Housing Site is one of six strategic housing sites in the NHDC Local Plan and as noted above is intended to deliver 2,100 homes (approximately 1,500 by 2031). Around 150 homes will meet requirements arising from within North Hertfordshire, with the remaining 1,950 homes addressing acute levels of unmet housing need that cannot be physically accommodated within Luton. The contribution towards unmet needs</p>	Noted.

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		from Luton will include the provision of both market and affordable homes.	
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	Planning/ Landscape and Visual	In releasing land from the green belt and allocating the East of Luton Strategic Housing Site full regard was had to the London Luton Airport Expansion proposals. The London Luton Airport Expansion proposals were the subject of statutory consultation at the time of the Local Plan examination. The Preliminary Environmental Information Report included the same statement that is within the Environmental Statement that supports the DCO application and referenced in paragraph 5.1 below i.e. that additional hedgerow and hedgerow tree planting/restoration to the south side of public footpaths Offley 001, 002 and 003, would not be delivered or maintained to establishment should housing growth promoted for delivery under Policy SP8 of the NHDC Local Plan be forthcoming.	Noted.
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	Planning	Bloor Homes submitted an outline planning application to North Hertfordshire District Council ("NHDC") in 2017 for the majority of sites EL1	Noted.

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		<p>and EL2 (planning application reference: 17/00830/1) for up to 1,400 new homes, as well as a local centre, primary school and all-through school. Alongside the Bloor Homes application, The Crown Estate submitted an outline planning application to NHDC (ref: 16/02014/1) in 2016 for 660 new homes covering Site EL3 of the Land East of Luton allocation.</p> <p>Consideration of the relevant planning applications has been delayed due to the applications involving green belt release, consideration of which formed part of the examination of the North Hertfordshire Local Plan 2011-2031 which was also delayed.</p> <p>Since the adoption of the Local Plan Bloor Homes and the Crown Estate have been working on a refined masterplan in respect of the planning applications; the Local Plan requiring a Strategic Masterplan to be agreed as part of the grant of planning permission. Bloor Homes is committed to bringing forward the housing development and the expectation is that amendments to the current applications will be submitted early in</p>	

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		<p>2024 with the determination of applications by the end of that calendar year.</p>	
<p>Gowling WLG (UK) LLP on behalf of Bloor Homes Limited</p>	<p>Planning/ Landscape and Visual</p>	<p>Bloor Homes is keen to work with the Applicant and understands that the Applicant wishes to do likewise. Paragraph 14.10.3 of the Environmental Statement states: "It is assumed that additional hedgerow and hedgerow tree planting/restoration to the south side of public footpaths Offley 001, 002 and 003, identified in Figure 14.10 of this ES [TR020001/APP/5.03], would not be delivered or maintained to establishment should housing growth promoted for delivery under Policy SP8 of the NHDC Local Plan 2011-2031 be forthcoming, as development of this land is judged to screen the Proposed Development in views experienced by users of these PRoW". The references above to Policy SP8 are to the East of Luton Proposals.</p> <p>As noted above planning applications are currently with the local planning authority for the East of Luton Strategic Housing Site and Bloor Homes is</p>	<p>Noted.</p>

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		committed to bringing forward the housing development.	
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	Planning/ Landscape and Visual	Bloor Homes support the Luton Airport expansion proposals subject to confirmation that the housing growth promoted for delivery under Policy SP8 of the NHDC Local Plan 2011-2031 is now deemed to be forthcoming as per paragraph 14.10.3 of ES Chapter 14. Given the adoption of the NHDC Local Plan and Bloor Homes existing planning application, there should be clarity that the works will not need to be delivered.	The Applicant considers that the issue raised regarding hedgerow restoration was answered within the Applicant's Response to Relevant Representations Part 3 of 4 (Affected Persons) [REP1-026] page 2, in response to RR-0153.
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	LR/Legal	In the event that the works continue to be required then Bloor Homes are willing to work with the Applicant and would wish to seek the following assurances: (a) agreement with the Applicant that to the extent the landowners (and Bloor where it has become a landowner) agree to grant a licence for the purpose of undertaking the works that the Applicant will not exercise compulsory acquisition powers to undertake the hedgerow works. Such licence would need to acknowledge that the licence does not affect Bloor's/Landowner's right to	The Applicant has already provided a response to this comment within the Applicant's Response to Relevant Representations Part 3 of 4 (Affected Persons) [REP1-026] page 2, Table 4.1, in response to RR-0153.

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		claim compensation in connection with the use of the relevant property or in relation to the loss of land over which the works are to be undertaken in accordance with the Compensation Code;	
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	Consultation and Stakeholder Engagement	In the event that the works continue to be required then Bloor Homes are willing to work with the Applicant and would wish to seek the following assurances:... (b) provision for consulting the landowners and Bloor Homes on the detailed specification of the hedgerow works and a requirement to take any representations into account. Such specification to minimise the land used for the restoration;	The Applicant considers that the issue raised regarding hedgerow restoration was answered within the Applicant's Response to Relevant Representations Part 3 of 4 (Affected Persons) [REP1-026] page 3, in response to RR-0153.
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	Landscape and Visual	In the event that the works continue to be required then Bloor Homes are willing to work with the Applicant and would wish to seek the following assurances:... (c) clarity within the DCO or otherwise that the hedgerow works are limited to existing hedgerows with no creation of new hedgerows;	The Applicant considers that the issue raised regarding hedgerow restoration was answered within the Applicant's Response to Relevant Representations Part 3 of 4 (Affected Persons) [REP1-026] page 3, in response to RR-0153.

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Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	Landscape and Visual	<p>In the event that the works continue to be required then Bloor Homes are willing to work with the Applicant and would wish to seek the following assurances:...</p> <p>(d) agreement as to on-going maintenance and whether rights or a licence are to be granted for that purpose or whether any on-going maintenance will become the responsibility of the landowners/Bloor Homes and arrangements for removal of hedgerows where required in connection with the Strategic Housing Site development or access and egress for the Strategic Housing Site. That said Bloor Homes has had regard to the existing hedgerows in the masterplanning exercise and intends to retain these hedgerows. An overlay of the current masterplan and the extent of the hedgerow works is included as an annexure to these written representations.</p>	<p>The Applicant considers that the issue raised regarding hedgerow restoration was answered within the Applicant's Response to Relevant Representations Part 3 of 4 (Affected Persons) [REP1-026] page 3, in response to RR-0153.</p>
Gowling WLG (UK) LLP on behalf of Bloor Homes Limited	LR/Legal	<p>The assumption is that the hedgerow works within the East of Luton Strategic Housing Site should not be required as the housing development will screen views of the airport</p>	<p>The Applicant has had a meeting with Gowlings LLP on behalf of Bloor Homes and explained that a licence would not give sufficient certainty of rights required to carry out and maintain the hedgerow works that are</p>

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		<p>expansion proposals. Further clarity is required in this regard.</p> <p>Should the hedgerow works be required then Bloor Homes and the landowners are willing to grant a licence for this purpose such that compulsory purchase powers will not be required. Bloor Homes are, however, seeking further assurances and commitments in relation to the hedgerow works as outlined in section 5.</p>	<p>to be provided as part of the Proposed Development. Discussions are ongoing as to the most appropriate structure for an agreement thereby ensuring use of compulsory acquisition powers remain the option of last resort. The Applicant will continue to engage with Bloor Homes and their representatives.</p>

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Simon Leadbeater REP1-144	Climate change Planning	When councillors approved the expansion to 19 mppa they had, according to the FOI response I received in March 2022, not received any training on climate change.1 How can it be right for people to make decisions on projects worsening climate change to have had no special training concerning the implications of those decisions. For that reason alone the expansion should not be permitted.	<p>The comment is about LLAOL's P19 application and it not related to this application for development consent.</p> <p>Noted. This WR relates to a separate application.</p> <p>For this application for development consent, 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 Resilience of the ES [AP-035].</p>
Simon Leadbeater REP1-144	General	The people behind these proposals demonstrate a complete absence of empathy for people affected by them, overlaid by their latent anthropocentrism which creates a form of solipsism, that is, an inability to understand the reality of others. By others, I include nonhuman others, whose wellbeing I prioritise over my own.	The Applicant has considered and assessed a wide range of environmental and social aspects and matters and sought to develop the design and proposals to avoid, reduce and mitigate adverse effects. The Environmental Statement reports both adverse and beneficial effects that can be considered in the balance by the Examining Authority.

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Simon Leadbeater REP1-144	Planning	<p>The actions of the airport operator and of Luton Council have brought planning into disrepute and I have absolutely no confidence that any future controls would be respected. How could they be – when the Council has effectively incentivised the airport operator to break the planning conditions which that same council itself put in place?</p>	<p>There has been no incentivisation, by the Council, or by the Applicant, to encourage non-compliance with planning conditions.</p> <p>Green Controlled Growth (GCG) will be enforceable not only by Luton Borough Council but also by other Local Authorities. Further information on compliance with the GCG Framework, for which future enforcement action could take place via the Planning Act 2008, is set out in Section 2.7 of the GCG Explanatory Note [APP-217].</p>
Simon Leadbeater REP1-144	Planning	<p>As my wife often reminds me, these are not the actions of faceless organisations. Rather, we are talking here about the behaviour of individuals, who have discussed amongst themselves – and perhaps also personally reflected on – the decisions they later took. I urge the inspectors to give the Council's behaviour very serious consideration when considering the outcome of this inquiry.</p>	Noted.

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Catherine Mary Ternouth REP1-045	Flightpath	Surely a night period of 23.30-06.00 (16.2.6) is too short?	<p>This is the standard night movement control period applied at the designated London airports of Heathrow, Gatwick and Stansted where controls are set by the Secretary of State for Transport.</p> <p>An 8 hour period 23:00 to 07:00 is used for night noise assessment in Chapter 16 Noise and vibration of the Environmental Statement [REP1-003] and the Noise Envelope Limits and Thresholds in the Green Controlled Growth Framework [APP-218].</p>
Catherine Mary Ternouth REP1-045	Noise and Vibration	16.2.7 All through these sections there are 'warm words' about mitigation but no actual substance about how this can be achieved when there would be ever greater numbers of aircraft climbing to altitude and overflying the northern densely populated areas of St Albans.	<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 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</p>

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			<p>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]. 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>
Campbell Family REP1-044	Flightpath	<p>Having said the above, we are aware of planning priorities and subject to the limitations below would be in favour of the proposal;</p> <p>1. A reduction in night flights on a pro-rata basis to Heathrow. This would mean at a maximum capacity of 32mppa, a night flight number of around 48% of Heathrow's 67mppa. Heathrow is allowed 5,800 flights, so Luton should be allowed a maximum of 2,900- a significant reduction on the</p>	<p>Given the nature of operations at the airport, mainly by low-cost airlines making intensive use of their aircraft over the day, there is a requirement to enable them to operate a small number of flights during the night period as set out in Table 6.17 of the Need Case [AS-125].</p> <p>These are principally arriving flights returning their home base at London</p>

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		<p>9000 currently allowed. This would allow the community to sleep at night and compensated for the increase in daytime noise.</p>	<p>Luton Airport. These operations are essential to achieving 32 mppa.</p> <p>The impact of night flights 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 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]. 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</p>

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			night-time Significant Observed Adverse Effect Level (SOAEL). See Draft Compensation Policies Measures and Community First [AS-128] for further details.
John A Smith REP1-084	Surface Access	What is the airport authority going to do about this anti-social behaviour, which also increases traffic congestion, caused by its customers? They are happy to take their money but not accept nor pay for the consequences. [Submission comment is referring to parking on residential streets]	The Applicant and operator will continue to work with local authorities to understand the impacts of the airport-related parking on neighbouring streets. 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 in rural areas, to dissuade vehicles from using these roads to access the airport.
John A Smith REP1-084	Surface Access	I would also like to add the following points please: Transport - Roads: Question: What independent, detailed and extensive traffic surveys have been completed on all local roads (including the B653 and Harpenden High Street) as well as the M1? All we read about is "traffic and transport modelling", and it is well known that models are prone to incorrect and weak assumptions and can be flawed. They contain mathematics that you	The <u>Transport Assessment [APP-203 to APP-206]</u> 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. The CBLTM-LTN transport model has been used to consider the impacts of the

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		<p>would need a PhD to understand. We need meaningful traffic surveys that show the results in a simple format that a layman can easily understand. There is no consideration of passengers coming from the East and the West where there are no railways and they have no choice but to rely on the use of vehicles on local roads which sat-navs direct them onto.</p>	<p>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-XXX]. This has included data collection as reported in the Strategic Modelling data Collection Report Appendix C to the Transport Assessment [APP-XXX].</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</p>

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			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.
John A Smith REP1-084	Surface Access	<p>February 2023 London Luton Airport Expansion Planning Inspectorate Scheme Ref: TR020001</p> <p>Volume 5 Environmental Statement and Related Documents</p> <p>5.01 Chapter 18: Traffic and Transportation</p> <p>18.7.7 The B653 to the south of Luton provides a link to Harpenden and an alternative route to the A1(M) at Junction 4. This route is only attractive for car travel to and from a limited area which is confined to Harpenden, villages along the B653 and parts of Welwyn Garden City and Hatfield.</p> <p>Question: Where is the evidence for this critical assumption? What about passengers from Hertford, Ware, Hoddesdon, and even as far away as</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>

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		Chelmsford and Colchester? The B653 is no more than a country road, and already takes a lot of airport traffic to the detriment of the local population. There is also the Katherine Warington Secondary School adjacent to the B653, in Harpenden, which generates a lot of traffic at peak times, and some pupils come from Luton.	
John A Smith REP1-084	Surface Access	Question: When will full, detailed and extensive traffic surveys of the B653 be undertaken, especially during the high season? I urge the members of the Examining Authority to undertake a site visit and drive along the B653 from the airport to Wheathampstead and beyond at peak times. Also visit Harpenden town centre and study the traffic at peak times.	As noted above, the impacts of the Airport expansion have been extensively considered in the Transport Assessment [APP 203 to APP-206] . The Applicant and operator will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as set out within the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) (Appendix I of the Transport Assessment [APP-202]).
John A Smith REP1-084	Surface Access	18.7.33 From the transport modelling work undertaken, which includes M1 Junction 10, it is evident that: a) in the design year of 2039, in the 'Do	The 'do-minimum' is the future baseline in the absence of a proposed scheme and is a matter for the responsible highway authority which in the case of M1 Junction 10 is National Highways.

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		<p>Minimum' scenario, some form of motorway capacity improvement would be helpful in accommodating forecast background growth in the peak periods; and b) there is a need to consider the inclusion of such an improvement in the transport modelling to ensure that solutions for M1 Junction 10 and Airport Way are reasonably future proofed.</p> <p>Question: How vague and weak is that?! So what is the solution? Details please. This proposal cannot be approved on the basis of such flimsy comments</p>	<p>Notwithstanding this, the <u>Transport Assessment [APP-203 to APP-206]</u> 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. The proposed development includes measures to improve the capacity of M1 Junction 10 which would be delivered through the application for development consent.</p>
John A Smith REP1-084	Surface Access	<p>18.7.34 As such, and for modelling purposes only, it was deemed sensible to assume that the section of the M1 motorway between junctions 9 and 10 operates with an improved capacity that includes hard shoulder running. It is considered that hard shoulder running is the most likely scheme to improve motorway capacity should any scheme be considered by National Highways in the future.</p> <p>18.7.35 This does not imply that there</p>	<p>The <u>Transport Assessment [APP-203 to APP-206]</u> 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</p>

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		<p>is an approved scheme for widening of the M1, or that hard shoulder running, or any other capacity improvement is programmed to be delivered.</p> <p>Question: How can this be when the Government is cancelling the Dynamic Hard Shoulder to All Lane Running Conversions for Junctions 10 to 13 of the M1? What is the alternative? Without extra capacity on the M1, the whole scheme is a non-starter! Even the Labour Party have called on the Government to reinstate the hard shoulder on existing smart motorways, and they might be the Government within the next 15 months.</p>	<p>proposals, therefore, are not considered a constraint on the Proposed Development.</p>
John A Smith REP1-084	Surface Access	<p>Question: What are the Contingency Plans if the whole rail system is down, or there are severe delays?</p>	<p>The Train Operating Companies (TOC) have responsibility for running rail replacement buses when the rail network is not operational. The Airport operator will be in discussion with the TOCs and NR during this perturbed situation.</p>
John A Smith REP1-084	Surface Access	<p>Question: How can the DART and the rail system cope? Where is the evidence to prove that it can? What are the plans for passenger overflows?</p>	<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)</p>

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			<p>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 Travel Plan development process and the Airport Transport Forum to prioritise and agree any potential mitigation required.</p>
John A Smith REP1-084	Surface Access	<p>18.9.36 For southbound journeys, the existing loading on trains can be expected to be lower on the Thameslink service.</p> <p>Question: Where is the evidence for this? Surely, it is reasonable to expect that a family returning from holiday, with children and luggage, will take the first southbound train that arrives, whether it is the Luton Airport Express or Thameslink, especially if there are a lot of passengers waiting? After all,</p>	<p>The rail capacity impact analysis is set out within the Transport Assessment [APP-202], section 11.3. The analysis (Table 11.3 of the Transport Assessment) shows 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. The assumptions underpinning the analyses relies on pre-</p>

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		<p>the Luton Airport Express only runs 2 trains per hour. How would Thameslink cope with the potential influx of such a large number of passengers?</p>	<p>pandemic growth factors to ensure robustness in its approach.</p> <p>In terms of dealing with future passenger and staff trips on the rail network and review the impact on capacity, the extent of any potential interventions to support the growth of rail passenger numbers will depend on the monitoring and evaluation carried out as part of the Future Travel Plans and linked to Green Controlled Growth Framework [APP-218].</p>
Andrew Ferguson REP1-033	Biodiversity	<p>The proposal fails to provide the necessary degree of assurance that the plans to replace lost biodiversity are deliverable and that a biodiversity net gain would be achieved.</p>	<p>The Applicant is committed to deliver Biodiversity Net Gain, through extensive habitat provision and long-term management. Whilst it is still not mandatory for NSIPs such as the Proposed Development, the Applicant has set a voluntary ambition of achieving at least 10% BNG which is consistent with the ultimate intention of the Environment Act 2021.</p> <p>The Proposed Development achieves this as demonstrated by the BNG Report [APP-067] using the appropriate DEFRA</p>

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			<p>metric. The Outline Landscape and Biodiversity Management Plan (OLBMP) (Appendix 8.2 of the ES [AS-029]) will ensure appropriate management of the habitats for 50 years with monitoring included to identify the need for adjustments to the management as required.</p>
<p>Andrew Ferguson REP1-033</p>	<p>Local Environment Planning Climate Change</p>	<p>12.2 Mitigation measures The mitigations that are within the power of the proposer to deliver are few and weak. Others are optimistic and rely upon projections, third parties and an international agreement. The confident conclusion expressed in paragraph 12.3.5 “that the overall impact of the Proposed Development was Minor Adverse and Not Significant” is shockingly hubristic.</p>	<p>The comment raised covers many subjects. All mitigation measures in the Environmental Statement (ES) are appropriate and in response to predicted significant effect in accordance with the EIA Regulations. The Applicant appreciates there are several measures included in the Application and has submitted a Mitigation Route Map [AS-047] as a sign-posting document to help both the Examining Authority and interested parties understand how and where mitigation relied on by the ES is to be secured.</p> <p>The specific conclusion quoted is from the Chapter 12 Greenhouse Gasses of the Environmental Statement [APP-038]</p>

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			which follows the widely accepted 2022 industry best practice guidance developed by the Institute of Environmental Management and Assessment (Ref 3.4) (IEMA) and reported the conclusion correctly.
Andrew Ferguson REP1-033	Flightpath	16.1.5 The expectation that aircraft will in future be permitted to climb more quickly from the airport will only serve to exacerbate the noise problem locally to the airport. This would include my address	Changes to airspace and flightpaths (including changes that allow quicker climb profiles) 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 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]
Andrew Mills-Baker REP1-035	Noise and Vibration	I am making a further representation about the impact of aircraft noise on Breachwood Green, where I live. This is based on listening to the comments made at the initial public sessions and	The impact of noise from the Proposed Development on Breachwood Green is acknowledged. Continuing exposure above the Significant Observed Adverse Effect Level (SOAEL) and adverse likely

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		<p>reviewing new documents in the Examination Library.</p> <p>1. Breachwood Green: a tranquil village</p> <p>I note that the ExA made a site visit to Breachwood Green on Wednesday 9 August and I was interested in this quote "The background noise was noted to be relatively low and comprised bird song and distant plane noise, due to overflights at altitude to UK airports or other destinations. Aircraft noise was considered to be both noticeable and intrusive (interrupting conversation)". In contrast to this statement in the Applicant's document TR020001-000671-5.01, (now AS-080) on Tranquillity, paragraph 16.5.73 "areas surrounding the airport are amongst the least tranquil places in England". My lived experience is that, absent Luton Airport aircraft movements and the ground noise from the airport, this village is very quiet and tranquil.</p> <p>A number of personal testimonies have described the impact of aircraft</p>	<p>significant effects due to night-time noise increases have been identified for Southern parts of Breachwood Green (see Section 16.9 of Chapter 16 of the Environmental Statement [REP1-003]). These significant effects would be avoided through the provision of the full cost of insulation, so no residual significant effects have been identified for Breachwood Green.</p> <p>The assessment of noise takes into account the effect of relative tranquillity (see Section 16.5 of Chapter 16 of the Environmental Statement [REP1-003]).</p>

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		noise on their personal lives, and I concur with their statements. If I am in my garden, it is generally the case that conversations are interrupted when planes pass over on approach or leaving the airport.	
Andrew Mills-Baker REP1-035	Fleetmix	<p>The assumed aircraft mix compared to 2019 with and without growth is shown in TR 020001</p> <p>App 213 (now AS-125) Chap 7.04 Table 6.12 on page 143. It would appear that the opening of a second terminal would permit a new category of larger, heavier and potentially noisier aircraft to use Luton. The table includes the Boeing 787 Dreamliner and the Airbus A321 LR.</p> <p>CAA published noise databases, dated August 2023, show that a Dreamliner, with a maximum take off weight (MTOW) of 254,000kg, has an Effective Perceived Noise (EPN) approach of 95.3db min and 104.7db max and a flyover limit of 88.7db min and 98.6db max.</p>	<p>The fleet mix which has been used in the noise modelling is presented in Section 6.14 of Appendix 16.1 of the Environmental Statement [AS-096].</p> <p>This includes the Airbus A321LR and the Boeing 787 Dreamliner (from assessment Phase 2a onwards).</p> <p>The noise assessment in Chapter 16 of the Environmental Statement [REP1-003] takes the noise performance of these aircraft into account.</p>

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		<p>This compares to the much lighter Airbus A321 NEO, with MTOW of 97,000kg, equivalent EPN's are much lower at 94.1db/101.4db and 84.9db/93.0db. It is unclear whether these aircraft, new to Luton, have been included in the modelling.</p> <p>Appendix C in the Needs Case, APP-214 7.04, sets out an indicative busy timetable at 32m passengers. This includes these new planes on intercontinental routes not currently served by commercial aircraft at Luton.</p>	
Andrew Mills-Baker REP1-035	Compensation	<p>The Applicant has acknowledged the impact of noise on local communities with the proposals to significantly enhance insulation grants for residential properties. This is welcomed and should take place in any event. I have recently received a £3,000 grant, which was sufficient to replace the windows in only one bedroom. Whilst the new windows are of excellent quality and have reduced night time</p>	<p>The current insulation scheme is not part of the Proposed Development and comments regarding the current insulation schemes should be directed to the airport operator.</p> <p>The support for the enhanced insulation scheme is noted. As part of the Proposed Development, the current air noise insulation scheme administered by the airport operator will be updated if development consent is granted. The</p>

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		<p>noise disturbance, it has not been removed. This is because roof and wall insulation was not addressed. In any event, during summer months the windows are often open on warm evenings.</p> <p>I have made some inquiries of neighbours who have also had replacement windows fitted and their responses are the same as mine. One omission is any form of satisfaction survey to establish the results of the replacement windows or a before and after measurement of the noise reduction performance.</p>	<p>updated noise insulation scheme improves on the current scheme (both in terms of geographic scale and monetary value) and goes beyond current government policy expectations. The noise insulation packages will include suitable ventilation if required to allow windows to be kept closed.</p> <p>The Draft Compensation Policies, Measures and Community First [D2 ref tbc] has been updated to note that a proportionate testing regime will be developed in consultation with the London Luton Airport Consultative Committee to monitor and as necessary improve the quality control of the scheme going forward.</p>
Andrew Mills-Baker REP1-035	Flightpath	<p>The DHL Hub is at East Midlands airport and there is no acceptable justification for using Luton airport. Flight tracker shows that some of the arrivals depart swiftly for East Midlands and as a consequence brake on landing using noisy and intrusive engine reverse thrust</p>	<p>The DHL flights operate into London Luton Airport bringing in goods and packages for early morning delivery in the local area and in London. East Midlands Airport is too far away to be practical for such deliveries.</p> <p>The effects of reverse engine thrust have been taken into account in the noise</p>

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			assessment in Chapter 16 Noise and vibration of the Environmental Statement [REP1-003] .
Andrew Mills-Baker REP1-035	Noise	The applicant intends to continue with the existing scheduling of night flights and these will not be mitigated by the insulation programme.	<p>The impact of noise due to night flights 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 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 a scheme which will provide the full cost of insulation for bedrooms in households exposed above the night-time Significant Observed Adverse Effect Level (SOAEL). See Draft Compensation Policies Measures and</p>

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			Community First [AS-128] for further details.
Andrew Mills-Baker REP1-035	Compensation	Moreover, the projections are indicative and discretionary. The current arrangements are opaque and under the control of the airport operator and this failing has not been addressed. This should be changed and the allocation of relevant grants in the nearby communities should be controlled by the relevant local planning authorities. In the case of Breachwood Green, this would be North Herts District Council.	As noted in paragraph 6.1.17 of Draft Compensation Policies Measures and Community First [AS-128] , In order to ensure successful delivery of the scheme London Luton Airport Consultative Committee (LLACC) will identify priority areas for noise insulation. Membership of the LLACC includes relevant local planning authorities, including North Hertfordshire District Council. Homeowners will have the option of an appeal to LLACC where dissatisfied with the specification of work.
S Rostami REP1-137	GHG	1. A typical Boeing 737-800 aircraft uses 3200 litres of aviation fuel per hour flying over the UK to land at LLA. A simple calculation shows (3200 L/hrx0.8kg/L x70740 number of flights for 18m) the flights to LLA are currently emitting 169.776 mega tons of CO ₂ e per annum over the UK territory. This amount is going to increase to 302.362 mega tones of CO ₂ e per annum if the passenger number increase from 18 to 32m (the	An assessment of changes to greenhouse gases due to the Proposed Development is provided in the Environmental Statement Chapter 12 Greenhouse Gases [APP-038]. Emissions from construction, airport operations, air traffic movements and surface access are outlined in Section 12.9 on Chapter 12. No emissions sources have been omitted from the assessment.

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		number of flights will increase to 125984 per annum)...Also the above amount of CO2 emission do not include CO2 emitted by LLA activities under Scope 1 and 2.	
Jason Handscombe REP1-080	Need Case	If you must expand air traffic, do it in Gatwick or Stansted where this is far less of an issue.	Growth at Stansted, within its consented 43 mppa limit and the potential for growth at Gatwick has been taken into account in developing the demand forecasts as set out in Section 6 of the Need Case [AS-125]
Mr and Mrs C. Richardson REP1-107	Consultation and Stakeholder engagement	We attended Open Floor Hearing 1 last night virtually. It was excellent-thank you.	Noted
Mr and Mrs C. Richardson REP1-107	Air Quality	We live one mile from the airport and are frequently bothered by aviation fuel being dumped over our house. It smells bad and makes us feel nauseous. It makes spending time in the garden and opening windows impossible.	The applicant acknowledges this concern. The Applicant considers that the issue raised regarding the odour impacts, 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. As agreed with PINS during scoping, fuel jettisoning is scoped out on the basis that the jettisoning of fuel from aircraft is only undertaken in emergency scenarios,

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			when an aircraft is required to undertake an emergency landing. Jettisoning of fuel will usually occur over water and at high altitude in order to vaporise the fuel and facilitate dispersion.
Mr and Mrs C. Richardson REP1-107	Noise Property	If the expansion of the airport goes ahead, there are plans to widen the road (Wigmore Lane) in front of our house and install traffic lights. We will then lose most of our front lawn and have traffic idling a few feet from the front of the house most of the time. There will be constant fumes and noise and once again we won't be able to open the windows. At present there is a large roundabout which keeps the traffic moving. It also has mature trees and shrubs which are much more pleasant than traffic lights.	<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. No significant adverse effects from road traffic noise have been identified for Wigmore Lane. Further details can be 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, which included road vehicle emissions along Wigmore Lane. The assessment concludes that the impact of the Proposed Development would be not</p>

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			<p>significant for the assessment years assessed.</p> <p>It is not the case that any property would lose parts of their front lawn. No acquisition of residential property (in part or in full) is required for the Proposed Development.</p>
Mr and Mrs C. Richardson REP1-107	Need Case	New jobs created by the airport expansion would probably not serve the needs of the unemployed in the town.	The Employment and Training Strategy [APP-215] sets out the actions proposed to provide locally and within the wider region the required skill set such that as many of the jobs created at the airport go to those locally in need of employment.
Mr and Mrs C. Richardson REP1-107	Need Case	The funds for the airport expansion would be better used creating jobs for the low skilled and for housing the homeless.	<p>Luton Rising is the owner of the airport and is promoting airport growth to support economic growth, including jobs, in the most impactful way it can with its assets.</p> <p>Separately, Luton Council is taking steps to address the housing shortage and to attract further inward investment into the area to facilitate further growth.</p> <p>Luton has a thriving economy:</p>

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			<p>In 2023 the University of Bedfordshire was ranked as one of the top universities to start a Social Enterprise.</p> <p>In 2022, the town had the 7th highest private sector job creation in the country according to the Centre for Cities.</p> <p>In 2021 it was identified by Fasthosts, as the best all-round location to start a new business.</p>
Elizabeth Graham REP1-056	Climate Change	<p>This is supported by 2023 PRP Recommendation R2023-037: 'No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector GHG emissions and non-CO2 effects. A framework should be developed by DfT in cooperation with the Welsh, Scottish and Northern Irish Governments over the next 12 months and should be operational by the end of 2024. After a framework is developed, there should be no net airport expansion unless the carbon-intensity of aviation is outperforming the Government's emissions reduction</p>	<p>Although the Committee on Climate Change has made recommendations that expansion of airport capacity should not be expanded, this position is not legally binding and has not been accepted by Government.</p> <p>Although Committee on Climate Change has made recommendations that expansion of airport capacity should not be expanded, this position has not been accepted by Government as noted in REP1-014 submitted at Deadline 1. This is made clear in the Government's response to the Committee on Climate Change's 2022 report to parliament of March 2023:</p>

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		<p>pathway and can accommodate the additional demand.’</p> <p>I agree with this approach. Piecemeal consideration of requests for expansion will result in busting both capacity and overall emissions targets. The CCC has computed that ‘If all [current airport expansion] applications were approved, this would increase terminal passenger capacity by 97.4 million compared to 2018 levels, bringing total capacity to 467 million.’ Gatwick and Heathrow expansions alone would add 71.6m. (2023 PRP Box 10.1 page 276)</p>	<p>#197 <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. Our ‘high ambition’ scenario has residual emissions of 19 MtCO2e in 2050, compared to 23 MtCO2e residual emissions in the CCC’s Balanced Pathway.</i></p> <p><i>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>We note that a response to the 2023 progress report has not yet been</p>

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			published. The Jet Zero Strategy One Year On (July 2023) update re-affirms the position set out in the Jet Zero Strategy (July 2022). The update maintains the premise that aviation growth shouldn't be curbed to reduce emissions <i>“aviation decarbonisation must take place, as we continue to transition to a sustainable future in which we maintain the benefits of air travel.”</i>
Elizabeth Graham	Flightpath Planning	A number of developments are underway for additional housing and sensitive developments directly under or very close to the main departure and arrival routes. For example, in Knebworth under the NHDC local plan, 200 new homes plus a possible secondary school will be built under the easterly Dover/Clacton/Detling departure path and a further 400 along with a new primary school under the easterly Compton departure path. Large housing developments in Bragbury End are close to the easterly Dover/Clacton/Detling departure path and other substantial housing developments to the east of Stevenage are under or close to the westerly arrivals path. There will be many such other developments throughout Hertfordshire, as it is hard to find a location which is not overflowed.	It is for local planning authorities to determine the acceptability of granting planning consent for new housing in areas under existing flightpaths. The airport operator works closely with local planning authorities to ensure that careful consideration is given to planning decisions in noise sensitive areas. The London Luton Airport Consultative Committee also monitors wider development planning matters to discourage local planning authorities from permitting inappropriate development in noise sensitive areas.

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Elizabeth Graham	Noise and Vibration	<p>After our response to the consultation for the 2005 Luton Masterplan, Luton Airport undertook some monitoring of westerly arrivals in April 2006 in Fairlands Valley Park in east Stevenage, where planes rise to join the glide path and drop their undercarriage. They made 17 observations, of which 8 planes had a maximum noise level of over 70 LAFmx with the noisiest at 78.9 (the plane was banking). We then asked the airport team to check four of the planes against their own noise monitor, which is about half way between Stevenage and the end of the runway. For the four readings examined in more detail, the readings over Stevenage were comparable to, or higher than, the readings for the same aircraft at the permanent monitoring station. This is not what one would expect from the noise contours and suggests that the noise contours do not accurately reflect what actually happens. The airport team was unable to provide an explanation. I note that calibration in Stevenage was undertaken on the west side where operations are easier to model.</p>	<p>As shown in Section 6 of Appendix 16.1 of the Environmental Statement [AS-096] it is common to see significant variability in aircraft noise measurements due to weather, different aircraft types, different horizontal/vertical profiles and different lateral locations of measurement equipment relative to the aircraft position.</p>

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Elizabeth Graham	Noise and Vibration	<p>The supposed introduction of CDA in 2007 did not made a noticeable difference to the noise I experienced over the north and east of Stevenage from westerly arrivals. Measurements taken on our Stevenage property between 2005 and 2012 showed that some of these landing aircraft reached almost 80 decibels; on average they were about 65-70 decibels.</p>	<p>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 airport operator regularly achieves their target of 90% compliance and work with airlines to increase CDA performance where possible.</p> <p>It is not uncommon for L_{Amax} levels of up to 80dB or greater 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>
Elizabeth Graham	Climate Change	<p>Since I submitted my initial comments, the UK Climate Change Committee (CCC) has issued its latest progress report on reducing emissions (2023 Progress Report to Parliament 28 June 2023 – 2023 PRP). This report confirms a loss of confidence in the UK meeting its medium term Net Zero targets.</p>	<p>Although Committee on Climate Change has made recommendations that expansion of airport capacity should not be expanded, this position has not been accepted by Government as noted in REP1-014 submitted at Deadline 1. This is made clear in the Government's response to the Committee on Climate</p>

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		<p>... One of 9 key messages is 'The need for a framework to manage airport capacity. There has been continued airport expansion in recent years, counter to our assessment that there should be no net airport expansion across the UK'.</p> <p>...The CCC 2023 PRP questions many of the assumptions Luton Airport relies upon to mitigate its carbon emissions (which are still projected to increase by 89%). For example: Luton Airport's assessment relies upon the development and availability of SAF (12.3.2b). However, the CCC states that '... risks remain unaddressed, particularly for securing SAF feedstock and SAF import supply, as well as planning for potential delays to nascent technology roll-out. The SAF mandate process is delayed, and insufficient policy has been brought forward to address demand management. The required emissions reduction for the Sixth Carbon Budget period [2033-2037] is therefore at significant risk' (2023 PRP Page 278 and Figure 10.9.) 2. Luton Airport's assessment relies upon the rollout (i.e. development and availability) of zeroemission aircraft to reduce emissions (12.3.2c). However, the CCC remains</p>	<p>Change's 2022 report to parliament of March 2023: #197 <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. Our 'high ambition' scenario has residual emissions of 19 MtCO2e in 2050, compared to 23 MtCO2e residual emissions in the CCC's Balanced Pathway.</i> <i>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>

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		<p>sceptical. 'The Jet Zero Strategy reconfirms that Government is aiming to have zero emission routes connecting the UK by 2030 but does not outline how Government will support the roll-out of zero-emission aircraft beyond 2030.' (2023 PRP page 280) 3. Luton Airport relies upon offsetting to deal with the balance of emissions (12.3.2a). Whilst acknowledging that this plays a role for aviation, the CCC comments that 'There has been no progress on offsets and removals policy specific to the aviation sector' (2023 PRP page 280), and further that 'reliance on offsets could slow progress to Net Zero' (2023 PRP page 355). The CCC advises that 'Airlines should ensure that their company-wide carbon offsetting schemes and voluntary schemes offered to consumers only invest in high-quality, long-lived offset schemes and provide regular, annual monitoring, reporting and verification on their use of offsets.' (2023 PRP Page 281). However the number of seat-kms flown by airlines associated with an offset was only 32% for the UK in 2022, falling to 29% for international flights (2023 PRP page 270). 4. The CC advises that 'Once available, airlines should use high quality, permanent GHG removals instead of</p>	<p>We note that a response to the 2023 progress report has not yet been published. The Jet Zero Strategy One Year On (July 2023) update re-affirms the position set out in the Jet Zero Strategy (July 2022). The update maintains the premise that aviation growth shouldn't be curbed to reduce emissions "<i>aviation decarbonisation must take place, as we continue to transition to a sustainable future in which we maintain the benefits of air travel.</i>"</p>

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		offsetting schemes.' (2023 PRP Page 281). There is no mention of GHG removal in the non-technical summary.	
Elizabeth Graham	Green Controlled Growth	For this expansion there is a proposed Green Controlled Growth Framework (document 7.08) based on preset thresholds overseen by an independent Environmental Scrutiny Group (ESG). In its Executive Summary this document states that 'If monitoring were to indicate at any point that a Limit was in danger of being breached, then plans must be produced by the airport operator to set out how that breach will be avoided, for approval by the ESG. If any one of the environmental Limits were breached (unless for reasons outside the airport operator's control), further growth will be stopped, mitigation will need to be implemented if required, and ultimately, airport capacity would be constrained until environmental performance returned below the Limits' (my emphasis) As many of the mitigations are outside the airport operator's control, this is worthless. If,	<p>The provisions relating to circumstances beyond the airport operator's control relate solely to the certification by the independent Environmental Scrutiny Group (ESG) as to whether a breach of a Limit or exceedance of a Level 2 Threshold was as a result of factors outside of their control, not the delivery of specific mitigation. The ESG would only make this determination in accordance with Paragraph A4.5.2 of its Terms of Reference [APP-219] if the operator has demonstrated that the circumstances were:</p> <ul style="list-style-type: none"> a. Not permanent in nature; b. Outside of the control or influence of the airport operator c. Directly related to the measured exceedance of a threshold or breach of a Limit. <p>Considering the examples given, aviation greenhouse gas emissions are not included within the scope of the GCG Framework [APP-218], with the</p>

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		for example, SAF is not possible at scale or new planes are not developed as predicted thresholds will be breached.	associated justification for their exclusion provided in Section 3.4 of the GCG Explanatory Note [APP-217] , and so the uptake of Sustainable Aviation Fuels (SAFs) is not relevant to compliance with the GCG Limits. If new aircraft types do not reduce aircraft noise to the same extent as forecast within Chapter 16 Noise and Vibration of the Environmental Statement [AS-080] , leading to a breach of the noise Limits, this would not be considered a circumstance beyond the operator's control, as it would not accord with the first principle above (i.e. the impacts of such new technology would be permanent in nature), and so future growth would be constrained.
Elizabeth Graham	Green Controlled Growth	In addition, it is proposed in 7.08 Appendix A that LBC are represented on the ESG along with the airline industry but these are members with a financial interest in increasing flights, so not impartial. The ESG has an aviation expert but no expert in climate change, air pollution or noise; these experts are on the technical panels but not the decision-making body. Why not have a climate change expert on the ESG and an	Justification for the proposed membership of the Environmental Scrutiny Group (ESG) and Technical Panels is provided in Section 2.4 of the GCG Explanatory Note [APP-217] . Luton Borough Council must be represented on the ESG in their role as the local planning authority where the

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		<p>advisory aviation panel with the aviation expert and airline representative? The two county councils are represented but only NHDC at a district levels. There is no council representation from heavily overflowed areas such as Stevenage, Tring, St Albans or Harpenden; I do not see why NHDC has been chosen as the sole council; they should all be involved. The ESG appears stacked in favour of the airport operator.</p>	<p>majority of the impacts of the Proposed Development are forecast to occur (including noise, air quality and traffic and transport). The 'representation from an airline industry body' will not be representing any of the specific airlines operating at Luton. A fundamental principle of the Green Controlled Growth Framework [APP-218] is that the scrutiny provided by the ESG should be independent and impartial, and that airport representatives (including representatives of airlines operating at the airport) should not have a role on ESG. The purpose of an airline industry representative is to provide guidance on how growth at the airport can be managed via the slot allocation process. Such an expert has no financial interest in increasing flights and changes to drafting are being considered to clarify this point.'</p> <p>The nature of the ESG is such that members will vote on decisions relating to all environmental topics, the closest analogy to which is the decisions or recommendations on planning</p>

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			<p>applications made my planning professionals in local planning authorities, who must base their decisions on the advice received from a range of technical specialists. The ESG has been structured to mirror this established approach to planning-related decision making, hence the requirement for local authority members to be qualified planning professionals. As such a climate change expert would not be considered qualified to make decisions relating to aircraft noise for example, were they to be a member of the ESG. It is however considered important for the members of the ESG to have the necessary advice and recommendations from technical experts in each of the four environmental topics, and it is on this basis that the membership of the Technical Panels has been considered.</p> <p>The makeup of the Noise Technical Panel has been based on the forecast shape of the 54 dB LA_{eq,16hr} (daytime) and 48 dB LA_{eq,8hr} contours, as reported in Chapter 16 Noise and Vibration of the Environmental Statement [AS-</p>

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			<p>080]). Where any part of those contours is within the boundary of a local authority with a statutory responsibility for public health (i.e. only the relevant authority with this responsibility in areas with two-tier authorities), that local authority is proposed as a member of the Noise Technical Pane. This includes:</p> <ul style="list-style-type: none"> • Central Bedfordshire Council • Dacorum Borough Council • Luton Borough Council • North Hertfordshire Council • Stevenage Borough Council <p>The referenced Councils not included above are not forecast to experience significant noise effects as a result of the Proposed Development, as defined by the referenced contours, or are not the relevant authority with respect to aircraft noise, and so are not considered to be required to oversee the implementation of and compliance with the Proposed Development. Similar principles apply to the make-up of the other three Technical Panels.</p>

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			<p>An appropriate balance must be found between the need to capture a diversity of views with the relevance of those views, the cost of administering the GCG process (both for local authorities and for the airport operator) and the need to keep a focused group of authorities in support of the ESG's decision making role. Therefore, only those Councils that are forecast to experience significant environmental effects across the range of topics within GCG have then been considered as members of the ESG. For example, Dacorum Borough Council is not forecast to experience any significant traffic and transport or air quality impacts, hence its exclusion from the ESG.</p>
Alison Mitchell	Consultation and Engagement	Request for further open floor meeting to facilitate a wider public consultation I submit request a further Open Floor Hearings before Deadline 1 (Tuesday 22 August). • This Open Floor Hearings should be targeted more explicitly to the wider public and especially to groups identified as at	<p>This comment appears to be for the attention of the Planning Inspectorate.</p> <p>The Planning Inspectorate has reserved dates (if required) for additional hearings week commencing Monday 27 November. This includes the provision for any Open Floor Hearing.</p>

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		<p>risk in the Equality Impact Assessment including all the geographical areas that will be affected by air traffic expansion by Luton airport. • An Equality Impact Assessment should be carried out on the Examination process itself to ensure that all groups included in the Equality Act are properly included in the Examination.</p>	
Alison Mitchell	Local Environment	<p>I was referred to Annex C of the Rule 6 letter, which includes an action on noise 'Noise • Effects of air and road traffic • Assessment and modelling assumptions including use of 2019 baseline • Night flights • Mitigation measures - including use of limits and quota counts' I do not consider that the statement fully achieves the aim that 'the effects of the Proposed Development in relation to human rights and equality duties are matters that will be taken into account as overarching or integral components of the initial assessment of principal issues by the Examining Authority when they consider the application.' This request for information should include • Impact on different protected</p>	<p>The impact of noise (including air and road traffic and night-flights) 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</p>

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		<p>characteristic groups • A wider geographical view of the affect population, under the flight paths where significant additional and constant noise will be prevalent.</p>	<p>will be secured through Requirement 27 of the Draft Development Consent Order [AS-067]. 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>As described in Chapter 16 of the Environmental Statement [REP1-003], the Applicant has undertaken an assessment of likely significant effects in Environmental Impact Assessment (EIA) terms by comparing the situation with the Proposed Development (the Do-Something scenario) to the situation without the Proposed Development (the Do-Minimum scenario) in each assessment year. The future air noise baseline (the Do-Minimum) is compliant with the airport's current consented long term noise limits in each assessment</p>

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			<p>year and therefore demonstrates a scenario where the airport is operating within its currently consented noise limits.</p> <p>Forecast noise exposure with the development is also compared to the 'current baseline' which is considered to be the actual noise levels in 2019, in line with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (which refers to the baseline scenario as "a description of the relevant aspects of the current state of the environment" in Schedule 4, paragraph 3).</p> <p>However, a sensitivity test using a '2019 Consented' baseline (derived for this purpose by adjusting the fleet mix that occurred in 2019 to reach a modelled noise impact that would sit within the existing 2019 short term Limits) is summarised in Chapter 16 Noise and Vibration of the ES [REP1-003].</p> <p>An assessment against both the 2019 Actuals and 2019 Consented baseline</p>

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			<p>has therefore been undertaken. The conclusions of residual significant effects remain the same for both assessments, as significant effects would be avoided through the provision of the full cost of noise insulation.</p> <p>The assessment of effects of the Proposed Development on vulnerable groups, those with protected characteristics, is reported in Chapter 13 Health and Community of the Environmental Statement [AS-078] and the Equality Impact Assessment [AS-129] submitted as part of the application. The Applicant is not in a position to comment on the examination process itself.</p>
Alison Mitchell	Flightpath	Also contact the organisation RELAS which has carried out its own data collection and impact studies.	The assessment reported in the Environmental Statement have used robust data from reliable sources and provide full references to data sources used.
Edward Franklin	Need Case	On the subject of long-haul services, I was bemused to note that despite the town of Luton being strongly associated with the south Asian	The runway at London Luton Airport is not sufficiently long enough for direct services to South Asia. However, offering services to hubs in the Middle

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		diaspora, the Airport doesn't mention points in Pakistan, 1 Application Document Ref: TR020001/APP/3.01 Bangladesh, India and so on for proposed services. This shows how out of touch this project's developers really are with the community it purports to serve!	East, such as Dubai or Doha could provide valuable connections for the local communities.
Edward Franklin	Need Case	Those earning higher salaries will simply live further away from the town and contribute to local economies elsewhere. The suggestion that the proposed development will 'clawback current out-commuting to higher paid jobs' (4.3.10) is nonsense	As set out in Appendix 11.1 of the ES [APP-079] , the airport supports a range of jobs at different skill and salary levels. Growth of employment at the Airport will contribute to the Borough Council's aim to reduce out-commuting as set out at paragraph 8.9.2 of the Need Case [AS-125]

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REP1-119: Openwide Investments Limited	Land and Property	Openwide Investments hold a land interest in the Ibis budget Luton Airport Hotel ('the Hotel'). The Hotel is not included within the Order Limits however lies immediately to the west of the works boundary. Category 3 of Section 57(4) of the Planning Act (2008) identifies 'Persons with Interest in the Land' ('PIL'); the 2008 Act also establishes the rights of PILs to make a claim for compensation in defined circumstances. The Book of Reference (Document number 3.02, APP-011) identifies Openwide Investments as a PIL in respect of the Proposed Development.	Noted. Openwide Investments Limited is a category 3 party noted in the Book of Reference [APP-011] due to its interests outside the Order limits.
REP1-119: Openwide Investments Limited	Construction Land and Property	It is noted that the DCO Limits do not cover the part of Airport Way used to access the Hotel. Phase 1 and Phase 2a of the Proposed Development both involve works in the area immediately east of the Hotel, including construction of the Airport Access Road (AAR) and link road (Work 6a01 and 6a02) (Document number 4.04, AS-017) which will run from the A1081 New Airport Way through the land behind the Hotel and over Airport Way (with no connection) to the new T2. Construction of the road will likely impact the Hotel in terms of noise,	The Interest Holder is advised that those who are impacted by the Proposed Development but do not have land subject to acquisition may be able to make a claim for statutory compensation for the physical impacts of construction activity. This is a statutory entitlement provided for by s10 Compulsory Purchase Act 1965. It is recommended that specialist advice is taken in respect of any compensation claim under the Compensation Code.

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		<p>dust, lighting spill, construction worker parking, and increase in traffic and congestion from construction traffic. While the DCO documents and Environmental Statement (ES) do not identify impacts to the Hotel (because receptors have been generalised, and in the case of Phase 1 it appears that the Hotel sits outside the Zone of Influence and as such not clear whether assessed), it is considered that impacts may be felt by the Hotel customers and staff.</p>	<p>The Zone of Influence is a term used in the Cumulative Effects Assessment reported in Chapter 21 [AS-032] of the Environmental Statement (ES), and these are shown in Figures 21.1 and 21.2 [APP-164] within which the hotel in question is located. However, of more direct relevance is the 'Study Area' of each technical assessment of the ES which is described in section 3 of each chapter. Which is the area within which potentially significant effects may occur and receptors are therefore included in the assessment. For example, for noise [REP1-003] section 16.3 describes Study Areas for air, ground and traffic noise and shows these areas on Figure 16.1 and 16.2 [AS-103] within which the hotel is located. Given the close proximity of the hotel to the Order Limits it is likely that the hotel is considered in assessments where it could be a relevant receptor. It may not be specifically named if the methodology considers representative receptors for example, depending on the methodology. However, where specifically considered it is reported, for example paragraph 16.9.236 and 16.9.248 of the noise assessment [REP1-003]. Effects on the hotel have therefore been appropriately assessed.</p>

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			Detailed construction impacts- including temporary access arrangements- are set out in Appendix 18.3 Outline Construction Traffic Management Plan (OCTMP) , which would be developed in detail by the appointed contractor during the detailed design stage.
REP1-119: Openwide Investments Limited	Construction Traffic Management Plan	The Outline Construction Traffic Management Plan (CTMP) (Document reference 5.02, APP-130) states that the majority of construction vehicles (of which during the peak construction period there will be over 150 vehicles per day arriving and departing, to which 75% would be HGVs) will approach the Site using the M1 and the A1081 (New Airport Way) – therefore construction vehicles should generally not pass the Hotel access/entrance. However, there is no means suggested to ensure this, aside from monitoring of construction traffic. Therefore it is reasonable to assume that some of the construction vehicles would use Airport Way – which could have implications for the Hotel in terms of traffic congestion, track out, dust and noise. Further information is sought on measures	Detailed construction impacts- including temporary access arrangements- are set out in Appendix 18.3 Outline Construction Traffic Management Plan (OCTMP) , which would be developed in detail by the appointed contractor during the detailed design stage.

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		to ensure that construction vehicles do not use Airport Way.	
REP1-119: Openwide Investments Limited	Surface Access	<p>A review of the stopping up plans confirm that whilst works will not directly impact the Hotel's access throughout the construction or operation, as the AAR is being constructed overtop of Airport Way to the east of the hotel, it likely that there could be knock-on or indirect temporary impacts, delays or road closures creating difficulties for staff and guests gaining access to the Hotel. It is noted that the A505 already suffers from congestion, as do other local roads, and the Proposed Development will only exacerbate this.</p> <p>More generally, if appropriate improvements to surface and public access do not come on stream at the right time, it is considered that there will be added pressure placed on local roads and public transport. It is considered that significant effort will be required by the Hotel to explain access arrangements to the Hotel and the potential loss of business if customers experience difficulties in securing access.</p>	<p>The Applicant considers that the issue raised regarding construction impacts was answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] pages 46-47, in response to RR-1129.</p> <p>As set out in the Transport Assessment [APP-203 to APP-206] and Surface Access Strategy [APP-228], the Applicant proposes to undertake monitoring to enable the impacts of the Proposed Development to be able to be considered during implementation. The Applicant and the airport operator will work with the local highway authorities and support appropriate measures in the event that there are impacts which occur as a consequence of the implementation of the Proposed Development</p>
REP1-119: Openwide	Draft DCO	Article 13 of the dDCO relates to 'Temporary stopping up and restriction of	The Applicant confirms that Article 13 would be able to apply to roads falling outside of the

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Investments Limited		<p>use of streets'. This Article would enable the Applicant to temporarily stop up, alter, divert or restrict the use of any street and may for any reasonable time divert traffic from the street, and prevent all persons from passing along the street. This is subject to a proposed Requirement to provide reasonable pedestrian access to and from premises abutting such a street. It is acknowledged that the Statement of Reasons (Document reference 3.01, AS-071) DCO document explains that this power would only be exercisable for the purpose of constructing the Proposed Development. However, it is not clear from our review whether this will apply to roads falling outside of the Order Limits. Clarification is sought on this matter i.e., if this power does apply to roads outside of the Limits then the Applicant has the potential to temporarily stop up Airport Way and with it, the access to the hotel – particularly noting that Airport Way could be viewed by the Applicant as a direct route to the works sites. It is noted that the DCO documents state that any person who suffers loss by the suspension of any</p>	<p>Order Limits. This is because at certain stages of the construction of the Proposed Development, the use of certain streets will become incompatible with the construction of the authorised development. However, this power is limited in a number of ways:</p> <ol style="list-style-type: none"> 1. It is only allowed in connection with the construction of the Proposed Development; 2. The power is only temporary; 3. The Applicant is required to provide reasonable pedestrian access to and from the premises abutting an affected street; and 4. The consent of the street authority, which may attach reasonable conditions to any consent, must be sought before the powers can be used.

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		private right of way under this article is entitled to compensation.	
REP1-119: Openwide Investments Limited	Surface Access	The new AAR will link to the new Terminal 2 and east of the airport from the A1081 New Airport Way. It is acknowledged that this would be a benefit to the Hotel as it would provide its customers with a direct link to the new terminal, placing the Hotel in close proximity to the terminal. However, following the implementation of Phases 2a and 2b (which includes construction of the new AAR), there is expected to be an increase in traffic. The section of Airport Way between A505 Vauxhall Way and Percival Way, where the Hotel's access is located, is estimated to see an increase in daily traffic flow from just over 4,200 vehicles per day to around 8,500 vehicles per day. Clarify is sought on how this more than doubling of traffic will not impact journey times, as well gaining access to/front the Hotel, for customers and staff travelling to and from the Hotel.	The Transport Assessment [APP-203 to APP-206] Section 10 , reports on flow changes and journey times for each development phase. It is acknowledged that there is predicted to be an increase in traffic along A501 New Airport Way (A1081) rather than Airport Way. Highway mitigation is proposed at each development phase as detailed in paragraph 10.3.4 to 10.3.7 of the Transport Assessment to accommodate the increase is vehicular traffic. The assessment of this highway mitigation alongside the airport expansion shows that journey times and access to the hotel would not be unduly affected.
REP1-119: Openwide Investments Limited	Noise and Vibration	The Proposed Development will give rise to a near doubling of aircraft traffic flying over the Hotel, meaning a considerable increase in the frequency of noise events experienced. This will significantly worsen	The impact of noise (due to construction, surface access and aircraft) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further

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		<p>the prevailing noise environment. The Noise ES chapter (Document reference 5.01, AS-080) assesses impacts on the Ibis budget (along with two other nearby hotels) as noise sensitive non-residential receptors. The assessment considers impacts in terms of construction noise, surface access noise (i.e., increased transport movements on the highway), and air noise.</p>	<p>details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>
<p>REP1-119: Openwide Investments Limited</p>	<p>Noise and Vibration</p>	<p>Construction noise and vibration: the assessment of Phase 1 only looks at receptors located to the north and south of the wider area of the DCO boundary. It is considered that there could be impacts on the hotel during Phase 1 and 2a of the construction works when the AAR is being constructed adjacent to the hotel. Further information is requested in relation to this to better understand implications for the hotel.</p>	<p>The Applicant considers that the issue raised regarding construction noise and the Ibis Budget hotel was answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] page 47, in response to RR-1129.</p>
<p>REP1-119: Openwide Investments Limited</p>	<p>Noise and Vibration</p>	<p>Surface access noise: the ES chapter states that while the hotel will experience an increase in road traffic noise from the increased use of Airport Way once the proposed expansion is operational, the Hotel was designed and built to mitigate against aircraft noise such that the road</p>	<p>Noted</p>

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		traffic noise impacts would not be significant (EIA terminology) to the internal noise levels of the Hotel.	
REP1-119: Openwide Investments Limited	Noise and Vibration	Air noise: the chapter states that effects will be non-significant impacts on non-residential receptors (including hotels). While this may be the case, it is not clear from the Noise Chapter or associated figures and appendices, whether the Ibis budget hotel falls within the hotels screened into the assessment for assessment Phase 1 (42 hotels), 2a (38 hotels), and 2b (39 hotels). From our experience coordinating EIAs, it is standard practice to identify clearly the receptors assessed. Clarification is sought on this point i.e., a figure identifying the receptors assessed and whether this includes the hotel.	The Applicant considers that the issue raised regarding screening and receptors was answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] page 48, in response to RR-1129.
REP1-119: Openwide Investments Limited	Planning Noise and Vibration	The Noise ES chapter does not propose any compensation or further mitigation, in relation to non-residential receptors assessed. Openwide Investments would welcome having a discussion with LLAL on potential mitigations to address harmful noise impacts arising.	The Applicant considers that the issue raised regarding mitigation and further discussions was answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] page 50, in response to RR-1129.
REP1-119: Openwide	Compensation	It is noted that the Applicant has submitted a Draft Compensation Policies, Measures	Noted.

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Investments Limited		<p>and Community First document (Document reference 7.10, AS-128), which appears to be the only mechanism proposed to address compensation. The document outlines draft compensation policies, including in relation to noise insulation and compensation, which would be secured in a Section 106 agreement.</p> <p>It is also noted that other matters addressed within the document include residential hardship, business relocation, and statutory compensation claims. From review, this document is tailored to residents, local community groups and causes, buildings, and businesses which are required to relocate to enable the delivery of the Proposed Development. The document does not directly refer to compensation mechanisms for other businesses, or hotels.</p>	<p>The Compensation Policies, Measures and Community First document is focused on the discretionary measures being proposed by the Applicant. It makes reference to statutory entitlements to compensation and provides a link to Government Guidance for landowners and occupiers affected by compulsory purchase (Ref vi).</p> <p>The guidance explains what is available for those who do not have land acquired under compulsory acquisition and are impacted during construction of the authorised works, and or by physical factors emanating from the operation of those works. Professional advice should be sought on statutory compensation.</p> <p>The Policy is directed towards those who would be most affected by the Proposed Development. See Draft Compensation Policies, Measures and Community First [AS-128].</p>
REP1-119: Openwide Investments Limited	Compensation	Further information on compensation options for identified 'Category 3 Parties' i.e., a PIL with a right to make a relevant claim is sought, particularly given that the	See Section 2 of the Draft Compensation Policies, Measures and Community First [AS-128] .

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		Applicant has identified Openwide Investments as such.	
REP1-119: Openwide Investments Limited	Air Quality	<p>The DCO application documents accepts that there will be an increase in pollutants from the expanded operation, despite improvements in aircraft engine technology. There are likely to be significant local air quality impacts from a combination of increased particulates, nitrogen oxide levels and odour – from aircraft immediately over-flying the Hotel, the increase in aircraft ground movements, the near doubling of aircraft and apron infrastructure, and the increase in surface access movements arising from passengers and airport employees travelling to and from the Airport.</p> <p>The air quality assessment states that without mitigation there could be significant impacts for 'high risk sites'. The Air Quality ES chapter (Document reference 5.01, AS-076) and appendices are not clear on what is considered to be a high risk site, or locate these, however the assessment states that no significant impacts would be created through implementation of 'best practice mitigation measures'. Clarification</p>	<p>The Applicant considers that the issue raised regarding the negative impacts of air pollution, was answered within the Applicant's Response to Relevant Representations Part 2C of 4 [REP1-023] page 87 and 88, in response to RR-0530 and others. The methodology and results of the assessment of the impacts of construction dust, including a definition of high-risk sites has been provided in Chapter 7 [APP-034] and Appendix 7.1 [AS-028] of the ES. Further detail on the risk level of receptors can be seen in the Institute of Air Quality management (IAQM) Guidance on the assessment of dust from demolition and construction pages 16-17. A Dust Management Plan is set out in the CoCP Appendix 4.2 of the ES [AS-087], this follows best practice guidance from the IAQM and will reduce any impacts to negligible.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		is sought on this point to better understand the likely impacts on the Hotel.	
REP1-119: Openwide Investments Limited	Economics and Employment	There may be pressures placed on the local employment and housing supply, when construction workers and airport workers move into the area and seek to live locally, and as an expanded airport requires more workers once operational. This may affect the availability of housing for those Hotel workers living locally, as well as the availability of a local workforce to run the Hotel. Further information is sought on whether this has been assessed and measured to ensure that Hotel workers living locally will not be impacted.	The temporary impact on housing from construction workers has been assessed and reported in section 11.9 Chapter 11 Economics and Employment of the Environmental Statement , this concluded the effect would be minor adverse and not significant.
REP1-076: Inspired Villages	Planning Noise and Vibration	Inspired Villages is due to open our ninth Retirement Community in Autumn 2023 at Millfield Green, located in Caddington Central Bedfordshire. Outline planning consent was granted for an Integrated Retirement Community of up to 200 units (Class C2) in January 2020 (Ref: CB/18/04602/OUT). Construction is underway for Phase 1 which received Reserved Matters consent in September 2020 (Ref: CB/20/01475/RM) for 86 units for older people. This new village will be located approximately 5.5km from the	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 Environmental Statement [REP1-003] . The written response makes reference to noise contours from the Preliminary Environmental Information Report (PEIR) and it should be noted that the noise contours, and the accompanying assessment of noise, has been updated in Chapter 16

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>western most part of the runway at Luton Airport and is nearing completion with the first residents due to move into the village later this year.</p> <p>We do not agree with the assessment of noise and have concerns regarding the mitigation measures proposed. As part of Luton Airport's expansion, the Airport has published airside noise contours within a Preliminary Environmental Information Report (PEIR). The contours have been based on upon aircraft movements for 2027, 2039 and for 2043 (Do-Nothing/Do-Something). Inspired Villages has commissioned InAcoustic, an Environmental Noise Consultancy, to review the airside noise contours in relation to Millfield Green Retirement Community.</p>	<p>Noise and Vibration of the Environmental Statement [REP1-003].</p>
<p>REP1-076: Inspired Villages</p>	<p>Nosie and Vibration</p>	<p>The noise contours are computed using the US Federal Aviation Authority's (FAA) Aviation Environmental Design Tool (AEDT). The PEIR also contains an inventory of the types/numbers of aircraft, arrival/departure routes and the potential change in aircraft technology/types that will have a lower noise profile (e.g. a reduction of Airbus A320 movements and an</p>	<p>The written response makes reference to fleet mix used in the Preliminary Environmental Information Report (PEIR) and it should be noted that this has been updated in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>increase of A321neo movements but with a lower noise profile).</p> <p>At Millfield Green Retirement Village, daytime noise levels are likely to increase between 1.8 and 2.1 dB for the 2027 and 2039 assessment years when comparing the Do-Nothing to Do-Something scenarios. For the night-time, the increases are likely to be between 1.4 and 2.7 dB for the 2027 and 2039 assessment years when comparing the Do-Nothing to Do-Something scenarios.</p>	
REP1-076: Inspired Villages	Noise and Vibration	<p>Clearly, the airport's expansion will increase noise levels at the development site by between 1 to 3 dB. Inspired Villages are concerned that the noise increase for residents will require mitigation going forward and question whether those who may not qualify for mandatory insulation as set out by Luton Airport Limited will be offered mitigation at a discretionary level as a consequence of the increase in noise levels at Millfield Green Retirement Village. The Noise Insulation Policy as set out in the Compensation Policy and Measures Report sets out only circumstances above the daytime 54dBLAeq,16h contour and</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.</p> <p>See Section 16.8 and Section 16.10 of Chapter 16 of the Environmental Statement [REP1-003] which lists all of the mitigation measures other than noise insulation. For</p>

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		<p>outside the daytime 57dBLAeq,16h contour (Scheme 5). No other mitigation measures are proposed, nor any consideration given to relative increase in noise, opposed to baseline and future noise levels.</p>	<p>example, 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>REP1-076: Inspired Villages</p>	<p>General</p>	<p>We wish to express our concern regarding the noise and air quality issues raised within the submission documents and request to be kept updated regarding the ongoing hearing procedures and forthcoming examination.</p>	<p>Noted.</p>

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REP1-073: Holiday Extras Ltd	Planning	My clients support the DCO application as it will deliver significant socio-economic benefits, both regionally as well as nationally. They also appreciate that there is a need for a comprehensive package of measures to mitigate the environmental effects derived from the Airport's expansion, seen in the context of the Government's specific net zero strategy for aviation.	Noted.
REP1-073: Holiday Extras Ltd	Surface Access	Holiday Extras Limited however, do have a number of concerns surrounding the topic of airport surface access, with particular reference to long term passenger related car parking provision. This document sets out those salient issues comprising my clients' concerns as they relate to the DCO application current being promoted by Luton Rising, with its underlying intention to build a new terminal accompanied by new infrastructure to increase London Luton' Airport's capacity in terms of the numbers of flights and passengers it can handle from 18mppa1 to 32mppa.	Noted.
REP1-073: Holiday Extras Ltd	Surface Access	My clients raised representations to the Pre-Application Consultation Exercises concerning the same development promoted by Luton Rising. They appreciate that the DCO application involves three separate	Noted.

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		<p>phases, with construction activities taking place over a 16-year period subject to forecast passenger demand, being regulated in accordance with what is referred to as Green Controlled Growth.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>It is relevant to indicate at the outset that Luton Borough Council along with Luton Rising, the trading name of London Luton Airport Ltd (hereinafter referred to as LLAL), have little influence over airport-related car parking demand, which is calculated by way of a series of assessments of how many passengers or movements can be handled over a busy hour. There is no simple definition of airport capacity. It is influenced by a range of individual capacities which themselves are derived from a number of separate parameters, including i) flight departure and arrival times; (ii) runway length; iii) apronage; iv) passenger terminal facilities; v) surface access, along with imposed restrictions governing environmental considerations.</p>	<p>Noted.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>Airport related car parking demand in a similar way is also influenced by a considerable number of issues, including availability of a private car; accessibility to public transport modes; price, associated</p>	<p>Noted.</p>

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		<p>with the cost of public transport or the parking product; the role played by low-cost carriers in route selection and journey frequency; intensity of hourly arrival and departures based on slot allocations; highway capacity; historic parking demand; and estimated non-UK leisure and business passenger throughput; to name some of the more important factors. Equally relevant is a wide variety of considerations falling under the umbrella of customer behaviour. These involve needs and attitudes in making air travel decisions encompassing matters such as safety, security and more recently the COVID-19 pandemic (behavioural considerations) to passenger catchment areas and route overlaps with competing airports.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>This vast array of material considerations requires above all a flexible approach to be taken to airport related parking demand and supply. It is particularly important where a 16-year construction period is involved, with an anticipated completion of the last phase (Phase 2b) not programmed until the fourth quarter of 2040. The 16-year construction period is interspersed with a five-year gap between completion of the Phase 1 works in</p>	<p>Noted.</p>

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		<p>the fourth quarter of 2027, and construction work commencing on Phase 2a in the first quarter of 2033. The 5-year period during which time construction activity will not be present on the airport, coincides with an expected rise in passenger throughput.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The same factors also require a collaborative approach to be adopted with long term offairport car parking companies such as Holiday Extras Limited. This becomes evident when it is realised that the current capacity of lawful long term off-airport car parking sites serving London Luton Airport, jointly exceeds that of the long stay on-airport product, at an anticipated throughput of 21.5mppa and 27mppa.</p>	<p>The application does not preclude Holiday Extras Limited or any other off-site car park operator from providing off-site airport car parks. The Applicant would engage with any off-site parking operator if a positive initial response was received from the relevant local planning authority, with regard to additional or extended off-site parking facilities.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The definition of "passenger non-sustainable travel" as part of an "unsustainable mode" is defined in paragraph 3.5.17d. of the Green Controlled Growth Explanatory Note [TR020001/APP/7.07] as comprising "travel by car, taxi (Hackney carriage), private hire vehicle (minicab/Uber, etc) motor cycle and any other modes with the exception of minibus, bus, coach, rail and tube (also referenced as metro, subway, tram in the CAA survey), walking, wheeling, cycling and</p>	<p>The Applicant considers that the issue raised regarding the definition of passenger non-sustainable travel was answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] page 11-12, in response to RR-0565.</p> <p>For the purposes of the application for development consent, 2019 passenger trips have been assigned to main modes based on the more detailed breakdown of final modes</p>

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		<p>other active modes (e-bikes, e-scooters, etc)". (my emphasis)</p> <p>This definition appears to exclude a traditional long term off-airport car parking facility of the kind operated by my clients from Slip End. This is despite the fact that the use conducted by Holiday Extras Limited leads to a reduction in private cars on the local highway network and as a consequence a resultant reduction in congestion and carbon emissions associated with passengers who would otherwise travel to the airport, whether as part of a "drop off"/"kiss and fly"4 trip or parking on-airport. Moreover, it does not sit comfortably with the view expressed by the Applicant and operator that members of staff comprising part of a car share are to be classified as a sustainable trip.</p> <p>The document comprising Appendix F – Surface Access Monitoring Report relies on the "main mode" of a particular trip, despite the dataset being recognised as having fewer survey records, with its results being inconsistent. Relying on the "main mode" is at variance with CAA records which is</p>	<p>recorded in the CAA dataset as follows, with their categorisation as 'sustainable' or 'non-sustainable' with respect to the GCG Limits. Car park (non-sustainable includes</p> <ul style="list-style-type: none"> i. motorcycle; ii. private car – airport long-term car park bus; iii. private car – business car park; iv. private car – hotel car park bus; v. private car – mid-stay car park bus; vi. private car – long term car park bus; vii. private car – short-term car park; viii. private car – short-term car park – meet/greet; ix. private car – staff car park bus; x. private car – type of car park unknown; xi. private car – valet service – off-airport; and xii. private car – valet service – on-airport. <p>For consistency with the approach taken to identifying baseline mode share in the transport forecasts for the Proposed Development, the full CAA dataset will be used with appropriate adjustments to take account of main mode of travel (rather than the currently reported summary of 'main mode'). For</p>

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		<p>determined according to the final mode of travel, being the last mode used to access the airport. It is inconsistent with the approach to monitoring passenger mode share, which as indicated in the FTP [TR020001/APP/7.13] is dependent on CAA passenger survey data, particularly the final data sets, published at Easter time.</p>	<p>example, when a passenger is recorded as making a two-leg private car / car park shuttle bus trip, this would be recorded as private car. The use of off-site car parks is therefore not considered as public transport, and is not considered a sustainable trip.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The Examining Authority will be aware from the Open Floor Hearing 1 on Thursday 10th August 2023, that from mid November 2019 to the end of February 2020, discussions took place between Holiday Extras Ltd and representatives of LLAL over the provision of a new satellite long term off-airport car parking facility, to be run jointly by both parties to meet the needs of air passengers relying on the private car mode as part of a future DCO application.</p> <p>No reasons were given as to why these discussions came to an abrupt end. No reference has been made in subsequent consultation exercises exploring the opportunity of a satellite off-airport car parking facility, which has distinct benefits in reducing trips and vehicle emissions on the highway network close to LLA; minimising indiscriminate passenger car parking on</p>	<p>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.</p>

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		surrounding residential streets; ensuring valuable space on-airport is used for optimum purposes, at the same time reducing encroachment onto Wigmore Valley Park/Green Horizons Park, a treasured local green space.	
REP1-073: Holiday Extras Ltd	Surface Access	The contents of paragraph 4.15.3 of the 2019 Statutory Consultation Feedback Report Appendix A Part 2 encapsulated the concerns raised by the local community on the issue of airport related car parking taking place in residential streets, viz: "4.15.3 Parking was a controversial topic for the local community, with some community consultees suggesting that providing additional car parking spaces would encourage the use of private cars, leading to additional congestion and pollution (36). Other community respondents suggested that proposals do not include sufficient parking spaces for both airport users (48) and employees (12), which would lead to airport users parking on residential streets (84). The cost of parking was a common issue raised, with concerns around the current cost of parking and drop-offs, as well as concerns that future costs would be too high (147)."	Noted. The application for development consent is not seeking to obtain powers to implement site-wide road user charges, however car parking and drop-off charges will remain.

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		<p>The response from Luton Rising to this earlier consultation exercise was opaque, and in my clients view did not satisfactorily address the high cost of on-airport car parking, including that relating to parking/drop off charges, viz:- “Drop off/parking charges will be/are set by the operator, however we are seeking powers to introduce additional charges for road users accessing the airport in order to encourage sustainable modes of transport. Further information can be found in the SAETS6. In the application for development consent we will develop proposals into a clear framework to govern the setting and varying of charges. This will make clear how decisions will be made and set out the process to be followed before new charges could be imposed or existing charges varied.”</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>It is Holiday Extras Limited's opinion that an opportunity has been lost in assessing reasonable alternatives concerning the provision of future airport related car parking as part of the current DCO application. It is considered inappropriate for the Applicant to propose a 16mppa increase in passenger throughput, covering a 16-year period</p>	<p>Future passenger on-site car parking requirements have been determined from the baseline of 10,550 parking spaces which was the level of on-site car parking required at the point when the airport reached its permitted capacity of 18 mppa.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>through to 2043, without having first reviewed potential alternative airport related car parking locations. This is particularly apposite given that earlier consultation exercises pending the submission of the DCO application resulted in suggestions for a park and ride scheme for local users, which elicited the following response from Luton Rising: "Currently, there are no proposals to provide park and ride schemes and they are deemed not necessary for the public transport strategy for the Proposed Development. Our surface access strategy mitigates the impact of the Proposed Development without the need for a park and ride scheme. If a promoter(s) were to come forward with sites to be used for a park and ride scheme we would engage with him as appropriate, although such a scheme is not necessary as part of the Proposed Development." (my emphasis)</p>	<p>The future on-site 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, AS-123, APP-205, APP-206]. The passenger mode split shown in Table 9.5 of the Transport Assessment also shows that off-site parking is assumed to form part of the surface access options to access the airport in the future, with the expanded airport.</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>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The requirement to investigate whether a satellite park and ride facility should be provided was a consideration explored during the consultation period leading up to the submission of an outline application Reference No. 18/P/5118/OUT to North Somerset Council seeking an expansion of</p>	<p>A comprehensive sifting process (optioneering) was conducted which assessed many criteria. This included seeking to accommodate car parking on land already in the ownership of LR or its stakeholders, plus a desire to minimise impact on green belt (i.e., car parking being</p>

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		<p>Bristol International Airport (hereinafter referred to as BIA) from 10mppa to 12mppa. There is no reason why the same exercise should not have been undertaken by Luton Rising in which various options could have been tested according to agreed selection criteria, to highlight various strengths and weaknesses.</p>	<p>constructed on GB). The outcome of this initial sift exercise informed the non-statutory consultation which followed. Details of the sifting process can be found in the Design and Access Statement [AS-049, AS-124].</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Planning</p>	<p>In the case of BIA an overarching approach was adopted to the identification of possible options for additional airport related car parking provision. This exercise included (i) sites within the Green Belt Inset Map which included part of the operational area of the airport; (ii) strategic park and ride locations remote from the Airport including land outside the Green Belt; (iii) sites within the Airport but outside the Green Belt Inset; and (iv) sites within Green Belt locations contiguous to the Airport. No such similar exercise has taken place with respect to the expansion of LLAL.</p>	<p>The Applicant is not pursuing off-site third-party parking options as part of the DCO, but anticipates that 3rd party off-site parking providers will seize the opportunity created by airport growth to provide proportionately greater capacity of their own operation, subject to separate planning applications.</p> <p>Please also note the preceding comment in relation to the optioneering process which was undertaken including consideration of the Green Belt.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>In the same vein, there is no reason why, for example, a joint exercise involving the Applicant, Holiday Extras Limited, Central Bedfordshire Council and other interest parties should not have explored the</p>	<p>The application does not preclude Holiday Extras Limited or any other off-site car park operator from providing off-site airport car parks. The Applicant would engage with any off-site parking operator if a positive initial</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>opportunity of providing a long term off-airport satellite facility, where an agreed financial contribution derived from the income resulting from the use would be channelled into assist sustainable travel modes, as is the case with London Gatwick and London Stansted Airports. The same option could also be extended to assess the extent and frequency to which certain properties in selected residential streets rent out land on their driveways for unrelated airport car parking purposes, leading to increased car parking becoming prevalent. In this scenario, a related aim would be to secure on-street parking restrictions, preventing indiscriminate airport related car parking from taking place in primary residential areas.</p>	<p>response was received from the relevant local planning authority, with regard to additional or extended off-site parking facilities.</p> <p>The passenger mode split shown in Table 9.5 of the Transport Assessment [APP-203, AS-123, APP-205, APP-206] shows that off-site parking is assumed to form part of the surface access modes used to access the airport in the future, with the expanded airport.</p> <p>It is recognised that there may be residual impacts relating to parking on residential streets as a result of the Proposed Development. The Applicant is committed to supporting Host Authorities to address this issue. The Applicant cannot, however, control how occupiers of residential properties use their driveways.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>A satellite long term off-airport car parking facility should have been considered in the context of the response previously set out by LLAL in paragraph 2.6.23 of the document entitled "Getting to and from the Airport – Our Emerging Transport Strategy": "2.6.23</p>	<p>Subsequent to the 2022 Statutory Consultation where the referenced document was published, the Applicant has developed its Surface Access Strategy [APP-228] which defines a 20-year vision and objectives for surface access at the airport. The first</p>

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		<p>For those passengers that have no reasonable alternative choice to driving, we want to ensure the overall number of vehicle movements at the airport is minimised and their environmental impact is reduced where possible. We will do this by encouraging more efficient use of the road network that will lead to less vehicle mileage overall by ensuring that passenger trips to the airport made by car and taxi are as clean as possible in terms of vehicle emissions.” (my emphasis)</p>	<p>objective of the SAS is to increase air passenger public transport mode share (which does not include off-site parking/park and ride). In the first instance therefore, the Applicant is seeking to reduce the overall proportion of passenger car trips to the airport (both off-site and on-site) in favour of travel by bus, coach and rail. The Framework Travel Plan [AS-131] sets out how the Applicant will strive to achieve mode share targets more ambitious than the mode share Limits in the Green Controlled Growth Framework [APP-217].</p> <p>The Applicant is not pursuing off-site third-party parking options as part of the DCO. 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. Any such proposals would be subject to their own planning applications, and would be required to demonstrate the associated traffic impacts were acceptable to the relevant local planning authority.</p>

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REP1-073: Holiday Extras Ltd	Surface Access	<p>A traditional long term off-airport park and ride facility would result in vehicle movements to and from LLA, being significantly reduced, whether involving private cars or “drop-off”/“kiss-and-fly” modes, leading to a more efficient use of the local highway network, reducing congestion and involving less overall vehicle mileage, with ensuing benefits for customers and the airport owner alike. To this end, my client’s existing long term off-airport car parking use is already assisting the Applicant in meeting its future modal split in favour of public transport of 40% at a passenger throughput of 21.5mppa, or 45% at a passenger throughput of 27mppa and 32mppa.</p>	<p>It is recognised that off-site parking remains an important aspect of meeting the airport’s total parking provision. The passenger mode split shown in Table 9.5 of the Transport Assessment [APP-203, AS-123, APP-205, APP-206] shows that off-site parking is assumed to form part of the surface access options to access the airport in the future, with the expanded airport.</p> <p>Additional off-site parking would potentially reduce the traffic in the local area around the Airport, but it may create impacts on the road network local to the off-site car park, where roads may be less suitable than the A1081 New Airport Way which forms the main access to the airport. Any such impacts would need to be mitigated by the promoters of additional / expanded off-site parking facilities, as part of a separate planning application.</p> <p>The Green Controlled Growth Framework Surface Access Monitoring Plan (Appendix F) [APP-224] contains information how surface access will be monitored, including what constitutes a</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
			<p>sustainable mode and a non-sustainable mode.</p> <p>For the purposes of the application for development consent, 2019 passenger trips have been assigned to main modes based on the more detailed breakdown of final modes recorded in the CAA dataset as follows, with their categorisation as 'sustainable' or 'non-sustainable' with respect to the GCG Limits. Car park (non-sustainable includes</p> <ul style="list-style-type: none"> i. motorcycle; ii. private car – airport long-term car park bus; iii. private car – business car park; iv. private car – hotel car park bus; v. private car – mid-stay car park bus; vi. private car – long term car park bus; vii. private car – short-term car park; viii. private car – short-term car park – meet/greet; ix. private car – staff car park bus; x. private car – type of car park unknown; xi. private car – valet service – off-airport; <p>and</p> <ul style="list-style-type: none"> xii. private car – valet service – on-airport. <p>For consistency with the approach taken to identifying baseline mode share in the</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
			<p>transport forecasts for the Proposed Development, the full CAA dataset will be used with appropriate adjustments to take account of main mode of travel (rather than the currently reported summary of 'main mode'). For example, when a passenger is recorded as making a two-leg private car / car park shuttle bus trip, this would be recorded as private car. The use of off-site car parks is therefore not considered as public transport, and is not considered a sustainable trip.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Luton Rising</p>	<p>Furthermore, the use of land at Slip End by Holiday Extras Ltd ensures compliance with the underlying objectives of Luton 2040: Climate Change and Action Plan, whose aims as far as surface access to LLA is concerned, includes an increase in trips to the Airport using active and substantive transport modes and to support the use of lower emission public transport and freight vehicles.</p> <p>Parking charges on-airport for whatever product are influenced by other sources, over which Luton Rising do not have</p>	<p>The Applicant has not acquired any interest in any such off-airport parking facility.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>complete control, with the consequence that engagement with lawful long term off-airport car parking operators is necessary, if a "clear framework to govern the setting and varying of charges" is to become a realistic objective. This is in spite of LLAL having previously recognised in Chapter 7 of the SAETS report that in seeking to deliver the best balance of sustainable surface access outcomes, requires the airport operator to take into account a number of factors including "offsite parking"</p> <p>These options are occurring at a time when I am reliably informed by my clients that the applicant has recently secured a long term off-airport car parking facility outside the Operational Area Boundary of LLA, which I understand does not benefit from any planning permission or lawful development certificate; reinforcing the concern raised by my clients that insufficient long term on-airport related car parking is being provided as part of the current DCO application.</p>	
REP1-073: Holiday Extras Ltd	Surface Access	No invitations have ever been extended to my clients to join the Airport Transport Forum or to become a member of the London Luton Consultative Committee, nor	The Applicant considers that the issue raised regarding membership of the ATF and LLACC was answered within the Applicant's Response to Relevant Representations

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>have they been invited to the Surface Access Technical Panel, given their experience and considerable knowledge over a period in excess of 20 years of running a long term off-airport car parking business serving passengers accessing LLA.</p> <p>The Examining Authority may also wish to consider what the consequences would be should my clients' long term off-airport car parking facility suddenly become unavailable for airport passengers, seen from the perspective of both lawful and unlawful airport related car parking; traffic congestion on the local highway network; increased carbon emissions; or considerations affecting air quality, the latter occurring in what has been referred to as one of the most polluted towns in the country.</p>	<p>Part 2B of 4 [REP1-022] page 17-18, in response to RR-0565.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>To the extent that the SAS has taken no account of the contribution made by long term off-airport car parking uses in contributing to the sustainability objectives of LLA; so too does the same situation apply with regard to the FTP.</p>	<p>The Green Controlled Growth Framework Surface Access Monitoring Plan (Appendix F) [APP-204] contains information on how surface access will be monitored, including what constitutes a sustainable mode and a non-sustainable mode.</p>

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			<p>For the purposes of the application for development consent, 2019 passenger trips have been assigned to main modes based on the more detailed breakdown of final modes recorded in the CAA dataset as follows, with their categorisation as 'sustainable' on 'non-sustainable' with respect to the GCG Limits. Car park (non-sustainable includes</p> <ul style="list-style-type: none"> i. motorcycle; ii. private car – airport long-term car park bus; iii. private car – business car park; iv. private car – hotel car park bus; v. private car – mid-stay car park bus; vi. private car – long term car park bus; vii. private car – short-term car park; viii. private car – short-term car park – meet/greet; ix. private car – staff car park bus; x. private car – type of car park unknown; xi. private car – valet service – off-airport; and xii. private car – valet service – on-airport. <p>For consistency with the approach taken to identifying baseline mode share in the transport forecasts for the Proposed</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
			<p>Development, the full CAA dataset will be used with appropriate adjustments to take account of main mode of travel (rather than the currently reported summary of 'main mode'). For example, when a passenger is recorded as making a two-leg private car / car park shuttle bus trip, this would be recorded as private car. The use of off-site car parks is therefore not considered as public transport, and is not considered a sustainable trip.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>FTPs will contain the results of on-going monitoring and consider comments and views from stakeholders including the Airport Transport Forum (ATF), the London Luton Airport Consultative Committee (LLACC) and its dedicated Passenger Services Sub-Committee on their content and level of ambition, although as previously indicated, no role has been set aside for Holiday Extras Ltd, the largest private long term off-airport car parking operator, to effectively engage in this process.</p> <p>This is a significant omission given that the primary purpose of ATFs as confirmed in</p>	<p>The Applicant considers that the issue raised regarding FTPs was answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] page 17, in response to RR-0565.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>paragraph 2.1.2 of the FTP [TR020001/APP/7.13] is to “encourage partnership between airport operators, local authorities, transport operators, local people and businesses, and other relevant parties, to improve public transport access to airports, and reduce reliance on private, road-based transport, congestion, and pollution on nearby roads”. (my emphasis).</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access/LLOAL</p>	<p>The ATF is intended to summarise current surface access across six priority areas in any five-year period, including consideration relating to “vehicle access, parking, private hire vehicles and taxis”, together with the specific matters relating to drop-off and pick-up locations, car parking locations and quanta. My clients as the only major private long term off-airport car parking operator have both a role to play in these important airport access related issues, at a time when the airport operator accepts its sustainability aspirations are reliant on third parties.</p> <p>In this respect, the toolbox of interventions and measures in the FTP where it concerns “vehicle access, parking, private hire vehicles and taxis” have implications and are pertinent to the running of a long term off-</p>	<p>Noted.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>airport car parking operation. This is particularly the case in those areas of i) promoting EV charging points for passengers and the uptake of electric vehicles; ii) improving forecourt operations especially limiting queueing and antisocial drop-off; iii) incentivising a change from diesel/petrol to electric/hybrid service vehicles; iv) contributing to a feasibility review associated with the opportunity to support luggage delivery from/to the airport to/from the passengers home destination, and v) improving an understanding of passenger travel behaviour as part of more comprehensive surveys to robustly monitor progress in achieving airport targets.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Green Controlled Growth</p>	<p>My clients have carefully considered the GCG Framework where it is directed at surface access and the various limits and thresholds surrounding future growth at London Luton Airport, alongside the approach to the preparation of Monitoring Reports and the trigger mechanism for the submission of a Mitigation Plan. It is acknowledged that the approach is innovative and far reaching in seeking to enable the sustainable expansion of London Luton Airport, particularly in circumstances</p>	<p>Noted.</p>

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		<p>where mitigation is necessary with reliance placed on the slot co-ordination process, and capacity declarations.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Green Controlled Growth</p>	<p>The extent to which this mechanism will ensure sustainable growth at LLA will largely be dependent on whether the airport operator can advance a case that the exceedance of a Threshold or breach of a Limit is due to circumstances beyond its control. There appear to be a number of instances where a case of this nature could be advanced, resulting in a conclusion made by the Environmental Scrutiny Group (hereinafter referred to as ESG) that no exceedances have occurred. These circumstances in part are highlighted in paragraphs 2.2.36, 2.2.39 and 2.2.40 taken from Document TR020001/APP/7.07 Green Controlled Growth Explanatory Note, but this does not appear to be a comprehensive list. Indeed, it may well be that the Airport Operator is able to advance a case that due to technological advances the Limit should be amended.</p>	<p>The Applicant disagrees that the controls on growth within the GCG Framework are dependent on the provisions for circumstances beyond the control of the operator. These provisions have only been included within the GCG Framework to prevent its operation being overly punitive, where the airport operator has complied with the obligations and requirements of the DCO. As set out in Paragraph 2.2.36 of the GCG Explanatory Note [APP-217], it is expected that where the airport operator puts forward a case that the exceedance of a Threshold or breach of a Limit is due to circumstances beyond their control, that these circumstances were not permanent in nature, outside their control or influence and directly related to the exceedance of a Threshold or breach of a Limit.</p> <p>The examples referenced at Paragraph 2.2.40 of the GCG Explanatory Note [APP-217] are illustrative, rather than exhaustive (as stated within the Explanatory Note), and whilst the operator is able to make a case</p>

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			<p>based on whatever grounds it sees fit, the decision whether to certify that those circumstances were the cause of a breach or not ultimately rests with the independent Environmental Scrutiny Group (ESG). The ESG would only make this determination in accordance with Paragraph A4.5.2 of its Terms of Reference [APP-219] if the operator has demonstrated that the circumstances were:</p> <ul style="list-style-type: none"> a. Not permanent in nature; b. Outside of the control or influence of the airport operator c. Directly related to the measured exceedance of a threshold or breach of a Limit. <p>Sustainable growth requires Limits to be complied with, and sustainable mode share to improve over time, as shown by the magnitude of the surface access Limits and how they change over time (as set out in Table 6.1 of the GCG Framework [APP-218]). Where Limits are updated in future, the ESG cannot approve any changes which would permit materially worse environmental</p>

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			effects to occur, as stated at Paragraph 2.3.4 of the GCG Framework [APP-218] .
REP1-073: Holiday Extras Ltd	Green Controlled Growth	It is noted that in the case of a Level 1 Threshold being exceeded, the mechanism would still allow for continued growth, despite the submission of an Annual Monitoring Report setting out additional information, pending a Level 2 Threshold being reached.	Noted and responded to with the comment below on Level 2 Thresholds.
REP1-073: Holiday Extras Ltd	Green Controlled Growth	In the case of a Level 2 Threshold being exceeded, an airport operator whilst required to ensure that any future capacity declaration does not increase from the existing capacity declaration, may through the submission of either a Level 2 Plan or an Annual Monitoring Report seek confirmation that the relevant effects no longer exceed the Level 2 Threshold. In the event that a Level 2 Plan considers that continued operations at the declared capacity are not likely to result in the effects increasing above the Limit, the Level 2 Plan may subsequently consider whether the airport capacity declaration can be increased. This process still allows for continued growth to take place	Within the GCG Framework, the thresholds serve as early warning indicators to the airport operator, allowing them to take a proactive approach to environmental mitigation. The Level 1 Threshold has the lowest value and provides an initial warning of increased environmental impacts (but is still well below the Limit). The Level 2 Threshold has the next highest value and provides warning that an environmental impact is approaching the Limit. The Limit has the highest value and breach of this results in significant constraints on the airport's growth. By including Level 1 and Level 2 Thresholds in the GCG Framework, growth will be required to be planned, and steps to be taken

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		<p>dependant on the mitigation details in an approved Level 2 Plan.</p>	<p>before a Limit is reached, with the ultimate intention that this early action avoids the Limit being exceeded. By taking this proactive approach, it will ensure that the plans for growth are adjusted in response to the prevailing circumstances at the time, rather than waiting for a problem to occur and then reacting. Where it can be demonstrated that future growth would not result in a Limit being breached (even where above the Level 2 Threshold), it is considered appropriate to allow this further growth subject to the approval of the Level 2 Plan by the ESG.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Green Controlled Growth</p>	<p>In cases where there is an impact over a Limit, following which a Mitigation Plan is required to be produced and approved indicating a programme for the implementation of any required mitigation; and any resultant mitigation is not successful, may lead the airport operator to consider a planned reduction in capacity. How the process of planned capacity reduction and its impact on slot allocation occurs does not seem to have been considered. Accordingly, the operation of the GCG Framework does not appear to be as comprehensive in preventing the growth of LLA as may be suggested.</p>	<p>Paragraph 24 of Schedule 2, Part 3 of the Draft Development Consent Order [AS-067] sets out the requirements on the airport operator in the event that a Limit has been breached. Sub-Paragraph 13 states that unless otherwise agreed with the Environmental Scrutiny Group, and until the relevant environmental effect has fallen beneath the Limit:</p> <p><i>“any future airport capacity declaration—</i> <i>(a) does not increase from the existing capacity declaration; and</i> <i>(b) includes criteria to ensure that the total number of allocated slots (excluding any emergency flights) does not exceed the existing number of allocated slots”.</i></p>

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			<p>Part (b) of this sub-paragraph is the functional requirement that would reduce capacity to a level that corresponds with the existing level of demand (based on number of allocated slots). This wording has been tested and agreed with Airport Coordination Limited (ACL), the independent co-ordinator responsible for slot allocation at the airport. This is to ensure that the GCG process is compliant with the UK Slot Regulations and enables the introduction of a cap on slots should a Limit be exceeded. This is considered to be a comprehensive and ultimately, a deliverable requirement to reduce capacity and restrict future growth at the airport until the relevant environmental effect has fallen beneath the Limit.</p> <p>This approach is outlined at Section 2.6 of the Green Controlled Growth Explanatory Note [APP-217] and will apply in all cases when a monitoring report identifies that a Limit has been breached and that a Mitigation Plan is required. It is intended that in all such cases, the airport will not be able to grow until the relevant impact has been mitigated and is below the relevant Limit. It is not intended to automatically require the airport operator to reduce the number of flights operating at the airport (I.e. constraining demand, rather than airport capacity), although the airport operator may choose to do so (subject to</p>

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			<p>compliance with the 'slot allocation' process, which is set out in the Worldwide Airport Slot Guidelines¹ and is subject to UK law) if it is felt that this is the most appropriate way to reduce an environmental effect below the Limit. Local Rules provide a mechanism by which the airport operator may be able to do this and there is precedent for the implementation of Local Rules aimed at reducing environmental impacts at the airport. This provides a mechanism for reducing capacity to levels below existing demand.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Green Controlled Growth</p>	<p>Holiday Extras Limited have reservations concerning the governance of the ESG whose independent Chair will initially be nominated by the airport operator, following consultation with the Applicant and Secretary of State. Luton Rising is the trading company of LLAL, with Luton Borough Council having a controlling interest in the company by virtue of its majority shareholding. The majority of parties represented on the ESG comprise local authorities with a tendency to pursue common goals, without the added diversity of views from private organisations with surface access business interests.</p>	<p>The Applicant considers that the issues raised regarding governance of the GCG framework were answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] page 21-22, in response to RR-0565.</p>

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REP1-073: Holiday Extras Ltd	Green Controlled Growth	Equally relevant is the remit of the Surface Access Technical Panel, where Holiday Extras Limited have a wealth of experience as a successful long term off-airport business, yet again no private organisations with surface access interests relating to airport car parking are expected to comprise this Panel, despite it being accepted that "not all of the organisations listed above have this in-house capacity".	The Applicant considers that the issues raised regarding governance of the GCG framework were answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] page 22-23, in response to RR-0565.
REP1-073: Holiday Extras Ltd	Surface Access	To the extent that Luton Rising are on record as suggesting at the Inquiry into their 19mppa "called in" proposals that public transport modal share could rise to 47%, with the supporting Public Transport Strategy Report indicating the airport could grow the same modal share to around 50%, raises the question whether the proposed future public transport share at 45% in 2043 is sufficiently ambitious. In addition, it poses the question as to what extent the figure of 45% has been selected to ensure compliance with Green Controlled Growth limits.	<p>It should be noted that the 19mppa (P19) proposals were put forward by the current Airport operators (LLAOL) as opposed to Luton Rising. The LLAOL proposals are entirely separate to the DCO application.</p> <p>The Applicant's approach to increasing public transport mode share is set out in the Public Transport Strategy as an appendix to the Transport Assessment [APP-202]. This demonstrates that there is potential for mode share to reach 49% by 2043.</p> <p>The traffic modelling undertaken in the Transport Assessment has assumed a more conservative future year public transport mode share (rail and bus), as a reasonable worst-case in terms of traffic generations.</p>

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			<p>The traffic modelling based on the conservative public transport assumption showed that the proposed highway mitigation strategy would mitigate the impact of the Proposed Development despite the constraints on M1 capacity.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>Six important aspects should be taken into account when considering public transport modal share figures set out in Table 1. Firstly, public transport modal share is largely dependent on non-UK business and leisure passengers, compared with UK based business and leisure passengers. This is a matter which falls outside the direct control of Luton Rising. LLA and London Stansted are comparable airports in terms of both UK based and foreign travellers' demand segments. The Environmental Statement relating to the expansion of London Stansted Airport to 43mppa confirms that in terms of foreign leisure and foreign business passengers, the proportion of trips made by public transport are significantly higher than those made by private car, with 22% of foreign leisure passengers dependent on public transport mode.</p>	<p>The Applicant considers that the issues raised regarding public transport mode share for non-UK business and leisure passengers were answered within the Applicant's Response to Relevant Representations Part 2B of 4 [REP1-022] page 25-26, in response to RR-0565.</p>

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		<p>Secondly in terms of UK based leisure and business travellers, a combination of the availability and frequency of public transport services found within a short distance of a passengers' home, along with whether interchanges are necessary as part of the journey to or from the selected airport, strongly influences modal choice. The passenger profiling data supplied by Holiday Extras Ltd relating to the use of land at Slip End as a long term off-airport car park, examined later in these representations is influenced by the same consideration.</p> <p>Thirdly, those passengers who have to rely on early morning departure flight times will have to factor into their modal choice to LLA not only price considerations; but competing airports offering equivalent destinations. A consideration of "lead time" will be relevant, calculated as the time spent from the point of entry into the terminal, passing through check-in and security and proceeding to the flight departure gate. It also necessitates, in terms of UK based arriving passengers, taking into consideration the "lag time", being the time spent from landing, passing through</p>	

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		<p>passport control; collecting any luggage from the baggage reclaim, before proceeding through customs and exiting the terminal. These time periods shown diagrammatically below are likely to be prolonged at periods when large numbers of passengers are passing through the airport, between 0400 and 0700 hrs, or arriving at the airport between 2200 hrs and midnight.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>In considering modal choice, reference should be made to a module of questions commissioned and designed by the Department of Transport which was included in the Office for National Statistics Omnibus Survey in February 2010. The table reproduced below sets out the reasons for choosing to travel by car/van or taxi (private transport) on their last trip to an airport, taken from a sample of 1005 respondents, from which it can be seen that convenience, speed and cheapness all formed principal considerations.</p>	<p>Industry recognised 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].</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>Appeal decisions involving long term off-airport car parking uses have demonstrated the significance to be attached to customer choice in the provision of surface access to an airport. In two separate appeals allowed by The Planning Inspectorate on 18th May</p>	<p>The application does not preclude Holiday Extras Limited or any other off-site car park operator from providing off-site airport car parks.</p>

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		<p>201110 involving Austin Hayes (UK) Ltd and land at Sentinel Car Park, Warren House Lane, Yeadon, Leeds LS19 7FT; and Learmonth Property Investment Co Ltd on land at Unit 1A Leeds Bradford Airport Industrial Estate, Harrogate Road, Leeds LS19 7WP, the Inspector Mr. P.J. Asquith MA(Hons) MA MRTPI concluded on the topic of "customer choice":-</p> <p>"55. A further factor to be borne in mind is that the proposals for off-airport parking provision would provide an element of customer choice compared with the near-monopolistic offer that would exist in their absence. Increased choice is a thrust of PPS4 and one which is repeated in the Ministerial Statement of 23 March 2011, Planning for Growth by the Minister for Decentralisation."</p>	<p>The passenger mode split shown in Table 9.5 of the Transport Assessment [APP-203, AS-123, APP-205, APP-206] shows that off-site parking is assumed to form part of the surface access options to access the airport in the future, with the expanded airport.</p>
REP1-073: Holiday Extras Ltd	Surface Access	<p>A similar conclusion was reached in two appeals concerning land at City Place, Crawley, West Sussex, allowed on appeal on 17th August 201211, in which the Inspector had the following comments to make on the subject of "consumer choice":-</p> <p>"23. However, the Council states the Annual Parking Survey indicates that the existing</p>	<p>The application does not preclude Holiday Extras Limited or any other off-site car park operator from providing off-site airport car parks.</p> <p>The passenger mode split shown in Table 9.5 of the Transport Assessment [APP-203,</p>

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		<p>long-term sites, both within and outside the airport boundary, are not fully occupied. While this may be so, there are many reasons for airport visitors choosing a particular car park, including, price, type of parking offered, (e.g. self-drive, meet-and-greet, open air, covered multi-storey), proximity and ease of access to terminal, ease of access from their point of origin, security, and reliability of the parking operator. 24. Although full occupation of the existing car parks cannot be guaranteed, and thus there is some spare capacity to cater for future needs, this does not mean that all parking proposals for new car parking should necessarily be refused. The Gatwick Master Plan Draft for Consultation 2011 (some two years after the Car Parking Strategy) identifies that attractive long-term parking is shown to be successful in reducing the proportion of passengers being dropped off, thereby reducing the volume of road trips to and from the airport.”</p>	<p>AS-123, APP-205, APP-206] shows that off-site parking is assumed to form part of the surface access options to access the airport in the future, with the expanded airport.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>Fourthly, a factor which remains important, being accepted by most airport operators, is that there will always be passengers who will continue to choose to travel to and from an airport by private car. These passengers</p>	<p>Noted</p>

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		<p>include the elderly, those who are mobility impaired, and those who travel from locations that are not well served by public transport, including groups and larger families, often with young children. The same passenger cohorts will also include those who are required to leave early in the morning to access LLA, and those passengers arriving home in the early hours, who may live some distance from the point at which they can access public transport.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>Fifthly, the increase in total public transport mode shown in Table 1 above between Phase 1 and Phase 2a amounting to 5% over a period of 12 years, should the DCO application be accepted, has to be seen in context, namely it is during the same time period that the sale of new petrol and diesel cars and vans is expected to end, with the same vehicles expected to be zero emissions at the tailpiece in 2035. To what extent this factor will impact on passengers' choice in travelling to LLA does not appear to have been analysed, being an integral part of those uncertainties surrounding surface access assessments, and why it is contended sufficient "headroom" or</p>	<p>We are aware of the changing composition of the vehicle fleet over time from petrol and diesel to zero emissions vehicles. The Framework Travel Plan [AS-131] has identified measures within the toolbox of measures and interventions to install additional EV charging points for passengers and staff as appropriate, as shown in Table 5.4. The effect of the scheme on highways has been assessed using a reasonable worst-case approach to car mode share.</p>

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		<p>"contingencies" should be taken into account in any surface access considerations.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>Sixthly, the information supplied in Document TR020001/APP/5.01 reveals that in terms of rail passengers, the greatest share in distribution of additional passenger loadings over each phase of the DCO application is in locations situated to the south of the airport, extending from Luton Airport Parkway Station to West Hampstead occupying a relatively small proportion of the catchment population of LLA.</p>	<p>The Need Case [APP-213] sets out the anticipated catchment area for the Airport, and highlights that the Airport is expected to expand the area it draws passengers from into the south. Figure 6.6 of the Need Case provides a map of passenger demand growth by district, from 2018 to 2050.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The Surface Access Strategy (hereinafter referred to as SAS) comprising part of the DCO application does not in any way grapple with the least sustainable means of passenger access to LLA, being what has been termed as "kiss-and-fly", along with taxis/minicabs, sometimes referred to as "drop-off"; both modes involving a doubling of trips to the same airport.</p>	<p>At present, the closest terminal drop-off area costs users £5 for 10 minutes and £1 per minute thereafter, discouraging drop-off and encouraging motorists to use car parks and alternative modes. Discounts are available for fully Electric Vehicles.</p> <p>Drop off and free period charges are subject to change to manage demand. In addition, a portion of the revenue of every parking transaction will be transferred to the Sustainable Transport Fund and will be used to promote sustainable transport options.</p>

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			<p>The Framework Travel Plan [AS-131] includes 'Ensure all changes in passenger parking provision are in line with the mode share Limits and Targets' and 'Introduce new measures which encourage more efficient use of taxi and private hire trips, ensuring where possible vehicles are occupied in both directions, thus reducing the number of empty vehicle trips coming in and out of the airport' in its toolbox of interventions and measures, including drop-off.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>It is counter-intuitive to set up a charging mechanism at the airport's car parks which on the one hand seeks to discourage the "kiss-and-fly" mode, whilst on the other, simultaneously proposing a steep increase in the number of drop-off and taxi spaces over the three phases of the DCO development, along with an additional pick/drop off area provided in car park 12 in Phase 2b.</p>	<p>The Airport currently seeks to discourage drop-off/pick up trips through the pricing tariff and waiting time restrictions.</p> <p>CAA data has been used as the basis for forecasting future mode share for travel to the expanded airport. The pick-up/drop-off and taxi mode share in the CAA data reflects the pricing tariffs used at the Airport and the Airport recognises that it needs to provide pick-up/drop-off facilities for those that need it.</p> <p>The pick-up/drop-off and taxi bays at Terminal 1 would be unchanged with the</p>

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			<p>additional provision provided at Terminal 2 to reflect the increased passenger numbers and to provide the convenience for those that need it. Table 9.5 of the Transport Assessment [APP-203, AS-123, APP-205, APP-206] makes provision for a small reduction in drop-off/pick-up and taxi trips</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The management of vehicle demand through the use of access and parking charges, whilst a key component associated with incentivising sustainable modes, vehicle choice and protecting surrounding communities from potential negative impacts; has the ability to give rise to unintended consequences in terms of parking in surrounding residential streets, in order to avoid having to pay costly on-airport car parking charges. In this respect, the pricing strategy adopted by Luton Rising towards all passenger car parking products, including the cost of using the Luton DART, is strongly correlated to the demand for on-airport passenger car parking products, including the extent to which passengers will</p>	<p>The Applicant and operator 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.</p> <p>Whilst the Applicant's plans for the Proposed Development and assessment of its impacts have been developed on the basis of forecasting, in line with relevant guidance and using the best available data, it is inevitable that the future will bring changes</p>

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		<p>then rely on the least sustainable access modes to the same airport.</p> <p>In the case of the current DCO application, a far more reaching impact is that all the proposed interventions and measures require funding to support both capital and operating costs. No framework forming part of the DCO application assesses the costs and benefits of surface access interventions to ensure investment decisions maximise the opportunity of reaching set targets, seen in terms of the choice of modal access share generally.</p> <p>Any aim of incentivising the use of cleaner greener vehicles serving the airport as part of a move to zero emissions has an opportunity cost; with the passenger asking themselves the question of whether there are alternative more reliable cheaper options; an important consideration to those households who are confronting cost of living difficulties or other financial challenges.</p>	<p>which cannot currently be foreseen with certainty.</p> <p>The Covid-19 pandemic and its effects on air travel demand and transport mode choice is a clear, recent example of changes in the certainty of forecasting that couldn't be reasonably foreseen. In this context, it is vital to be prepared with a variety of responses which are adaptable and can be used to enable the airport to remain within the GCG Limits and achieve the Applicant's surface access Targets in the context of an inherently uncertain future.</p> <p>The Framework Travel Plan [AS-131] sets out the monitoring approach to be undertaken, with a toolbox consisting of interventions and measures that the operator can draw upon and scale up or down as and when required. The toolbox would be deployed flexibly to respond to changing circumstances and the results of ongoing monitoring and stakeholder feedback and achieve Limits and Targets.</p>

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			There is no requirement for the Applicant to provide cost/benefit analyses in the DCO submission.
REP1-073: Holiday Extras Ltd	Surface Access	The contents of the Transport Assessment Document No. TR020001/APP/7.02 reveal that a large proportion of its contents are based on demonstrating that there will be available capacity on both the rail network and highway network to accommodate the anticipated growth at LLA through to 2043 when a passenger throughput of 32mppa is anticipated. Holiday Extras Limited do not dispute these conclusions, but they constitute only part of those primary considerations relating to modal choice. In itself capacity considerations should not be portrayed as representing the primary criterion governing passenger choice of preferred mode to LLA when assessing public transport use, especially at a time when improvements are to be carried out to the local and wider highway network as part of the same DCO proposals.	The future year passenger mode share assumptions used in the Transport Assessment [APP-203, AS-123, APP-205, APP-206] are forecast from CAA passenger survey data which reflects the accessibility of the Airport and the mode choices available to passengers. The forecast future year passenger mode split has been used to test the impact of the development on the highway and public transport network.
REP1-073: Holiday Extras Ltd	Surface Access	Table 1 reveals that in assessing public transport provision, only a limited increase in bus/coach modal share is expected over the 16-year construction period associated with the DCO application, which appears	The lack of east-west connectivity is noted within the Transport Assessment [APP-203, AS-123, APP-205, APP-206] however this needs to be taken into context with the

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>inconsistent with the primary aim of the Local Transport Plan 313 to improve east-west connectivity. In 2012, 16% of passengers relied upon bus/coach to access LLA. This is expected to reach 18% in 2043, notwithstanding spare capacity being available on the various coach services, by which time passenger throughput at the same airport will have increased over 333% over the same 29 year period. The figure of 18% in 2043 should be compared with that at London Stansted Airport, where in 2016 bus/coach patronage accounted for 23% of modal share, both airports revealing comparable passenger profiles.</p>	<p>lower volumes of passengers which access the airport from the east.</p> <p>As set out in the Transport Assessment and Surface Access Strategy [APP-228], the Applicant proposes to undertake monitoring to enable the impacts of the Proposed Development to be able to be considered during implementation such as parking in residential areas. The Applicant and the airport operator will work with the local highway authorities and support appropriate measures in the event that there are impacts which occur as a consequence of the implementation of the Proposed Development. There are ongoing discussions with regards to further clarity on the particular arrangements for funding of surface access related measures and interventions identified in the FTP, and these will be shared in due course and prior to examination.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>A 10% increase is expected between 2012 and 2043 in rail modal share, representing the largest percentage increase in public transport use to LLA. A comparison between this figure with that representing the least</p>	<p>This comparison combines historic and proposed future data and selects rail and taxi/private drop-off/pick-up modes only to claim that taxi/private drop-off/pick-up will continue to form a significant proportion of</p>

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		<p>sustainable mode of trips made to the same airport by taxi/minicab and private car drop-off between 2010 and 2043, reveals that trips made to LLA will decrease from 42.7% to 39% between these two dates i.e by only 3.7%¹⁴, during which time passenger throughput at the same airport has increased 368%. The inevitable conclusion to be derived from this exercise is that reliance on the least sustainable mode of access to LLA will continue to form a significant proportion of trips into the future.</p>	<p>trips into the future. The dates quoted are also inconsistent.</p> <p>For the historic period 2012 to 2019 (pre-covid), the rail mode share increased by 4% whilst the drop off mode share increased by 1% as shown in Table 6.3 of the Transport Assessment [APP-203, AS-123, APP-205, APP-206]. There was however a 7% reduction in the car parking mode share for the same period.</p> <p>In 2019 (pre-covid), the rail mode share was c21%. For 2043, the future year mode split assumptions include c27% rail travel (a 6% increase) as set out in Chapter 9 of the Transport Assessment [APP-203, AS-123, APP-205, APP-206]. A corresponding 6% reduction is proposed for the taxi and private drop-off between 2019 and 2043.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The impact of kiss-and-fly as a mode of access has been studied by Dr. Greg Marsden of the Institute of Transport Studies at Leeds University. He examined passenger access to Leeds-Bradford International Airport through the provision of two studies undertaken in 2004 and 2005. The results of</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 CAA passenger survey data which reflects the accessibility of the Airport and the mode choices available to passengers. A small decrease in taxi and</p>

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		<p>his studies found that over 40% of passengers were dropped off at the airport by friends, involving a 36% increase in terms of total distance travelled to the same airport over and above that which would have resulted if passengers had driven and parked themselves. He calculated that the 36% increase in travel distance equated to an additional 19.4 million kilometres.</p> <p>The figure of 40% of passengers being dropped off at Leeds Bradford International Airport by friends in Dr Greg Marsden's study is not dissimilar from the 43% of passengers who it is anticipated will either rely on "kiss-and-fly" and "drop-off" modes in 2027, or the 39% representing the same modes in 2039 and 2043, as revealed in Table 1 above. It is my client's view that this mode is not being sufficiently curtailed in terms of future airport related car parking supply at LLA into the foreseeable future.</p>	<p>private drop-off has been allowed in the future years but for highway impact assessment purposes, a higher taxi/private drop-off mode share offers a reasonable worst-case scenario.</p> <p>At present, the closest terminal drop-off area costs users £5 for 10 minutes and £1 per minute thereafter, discouraging drop-off and encouraging motorists to use car parks and alternative modes. Discounts are available for fully Electric Vehicles.</p> <p>The Framework Travel Plan includes 'Ensure all changes in passenger parking provision are in line with the mode share Limits and Targets' in its toolbox of interventions and measures, including drop-off.</p>
REP1-073: Holiday Extras Ltd	Surface Access	Dr Greg Marsden's research concluded that restricting parking spaces and raising charges at the same airport was only likely to have a marginal effect on modal split, and if anything, adopting this strategy was likely to have a potentially significantly negative	Drop off and free period charges are subject to change to manage demand. In addition, a portion of the revenue of every parking transaction will be transferred to the

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		<p>impact through additional miles travelled as a consequence of people accessing the airport by the kiss-and-fly mode. He concluded that far greater benefits were likely to accrue to the environment, congestion and safety if the double journeys generated by kiss-and-fly could be reduced, than could otherwise be made from small modal shifts to public transport usage, however desirable that may be.</p> <p>Whilst LLA imposes a charge of £5 for 10 minutes and £1 per minute thereafter for dropping off or picking up passengers closest to the terminal building; drop off/pick up is free in the long stay car park for a period of one hour, following which periods of up to 2 hours are charged at £5.00. The resultant cost provisions are not considered to be a sufficient disincentive for those relying on the “kiss-and-fly” or “drop-off” modes where the passenger is neither elderly nor of restricted mobility, with concerns raised that a meaningful shift in promoting alternative more sustainable modes of access to the same airport will not arise.</p>	<p>'sustainable transport fund' and will be used to promote sustainable transport options.</p>

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<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The same “kiss-and-fly” and “drop-off” modes also have to be looked at in the context that where no parking restrictions have been imposed in neighbouring residential streets, any subsequent increase in on-airport parking charges relating to the dropping off or picking up of passengers has the prospect of decanting cars, using neighbouring residential streets for the same purpose. This is an issue which has been singled out for specific mention by local residents as part of their initial representations to the DCO application.</p> <p>The preceding paragraphs are required to be seen in the context of the toolbox of interventions relating to “vehicle access, parking, private hire vehicles and taxis”, comprising part of the Framework Travel Plan (hereinafter referred to as FTP) which seek to introduce measures to encourage more efficient use of taxi and private hire trips. Whilst it is possible to ensure through related infrastructure governing on-airport circulation space, that taxis and minicabs are occupied in both directions, thereby reducing the number of empty vehicle trips coming into and out of the airport, a similar</p>	<p>The Applicant and operator 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.</p>

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		<p>mechanism is not possible taking into account trips made by the "kiss-and-fly" mode.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The DCO application has not examined as part of surface access considerations the approach taken towards airport related car parking at hotels/guest houses. In considering this topic, mention should be made of a Court of Appeal judgment involving Harrods Ltd v Secretary of state for the Environment Transport and The Regions and Another (2003) JPL 108 in which it was held by Lord Justice Schiemann who gave the leading judgment with which other Lord Justices concurred, that in the context of Harrods Department store it was not appropriate to concentrate upon what is incidental to this particular shop, given both the way it is run and its needs. The correct approach is to consider what shops in general have by way of reasonably incidental activities. That approach was correct because it was stated one must first consider, whether on its face, the introduction of the new use would amount to a material change of use, ignoring the provisions of the Use Classes Order. It</p>	<p>Vehicle movements between existing hotels / guest houses and existing car parks would have been accounted for within the 'base' traffic surveys which were undertaken, and for which growth has been applied to produce future year traffic flows.</p> <p>Vehicle movements between the hotels and off-site parking locations are expected to be low in the context of the vehicular trips generated by the expanded airport.</p>

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		<p>should then be decided whether that change was material.</p> <p>Applying the principles arising from the "Harrods" Court of Appeal judgment, it is not appropriate to concentrate on what may be "incidental" to hotels and guest houses lying within the vicinity of LLA, given the way they are run and their needs. The correct approach is to consider what hotels in general have by way of reasonably incidental activities. It is not generally the case that hotels incorporate as part of their activities, additional car parking to service what has been referred to as "stay and fly" packages, in that, it is not a general or normal incidental use associated with a hotel or guest house.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The presence of additional cars parked within the grounds of a hotel or guest house as part of a "stay and fly" package involves additional traffic movements beyond those which would generally be attributable to the primary use of land as a hotel or guest house. "Stay and fly" packages often involve customers' cars being moved by a long term off-airport car parking operator to an alternative site whilst the passenger is away</p>	<p>See above response.</p>

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		<p>on holiday or on a business trip, only to be brought back to the hotel or guest house awaiting the customer's return. Customers' cars are not always retained in the same position in the hotel car park over the duration of their trip, since not only are spaces required in anticipation of a customer's return, but the car park would not be able to properly function and meet the general needs of the hotel or guest house in such circumstances. The requirement to continually move cars to and from the hotel/guest house is due to the fact that in the overwhelming majority of cases, individual hotels and guest houses have a finite amount of land used for car parking purposes, and do not have ready access to adjoining land which may be used for overspill car parking purposes.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The approach confirmed in the Court of Appeal judgement in the "Harrods" case and its general application to airport related car parking at hotels/guest houses enjoys support through an earlier Lawful Development Certificate appeal decision (PINS Ref. Nos. APP/M3645/X/00/1046740 and A/11/1046484) dated 2nd February 2001 concerning land at the Hunters Moon</p>	<p>See above response.</p>

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		<p>Inn, Copthorne Bank, Copthorne, West Sussex in Tandridge DC's administrative area. This case involved a refusal of planning permission, along with a refusal to issue of a Lawful Development Certificate where, in the case of the latter, it related to the use of the hotel car park by hotel guests who were travelling elsewhere.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>Paragraphs 13 and 14 of the Hunters Moon appeal decision set out the Inspector's conclusions in respect of the Section 195 appeal, viz:-</p> <p>"13. Whilst the use of the hotel car park by guests is clearly ancillary to the lawful use of the hotel for the duration of their stay, I am unable to accept that there is functional link which ensures for up to 15 or 28 days after guests have vacated their rooms, taken their luggage and flown from Gatwick airport to a destination where they then stay in other accommodation. Although the owners of the parked vehicles return to the hotel to pick up their cars at the end of the holiday, the evidence indicates that few of them stay at the hotel for another night. Turning to the scale of the use, it is self-evident that the use of the hotel car park by hotel guests</p>	<p>See above response.</p>

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		<p>whilst they are actually staying there is unlikely to generate a parking accumulation much in excess of 10 cars, whereas the parking accumulation resulting from Gatwick parking facility was acknowledged to be up to 100 or more cars. On that basis, I consider that the scale of the use is such that it constitutes a primary element in a mixed use of the land. 14. I conclude as a matter of fact and degree that the use of the car park by hotel guests who have vacated the hotel and are travelling elsewhere is not ancillary or incidental to the lawful use of the land as a hotel/restaurant/public house. I also conclude that such use would be in breach of the enforcement notice upheld on appeal in February 1990. I therefore find that the Council's decision to refuse the application was well founded and I shall dismiss the appeal."</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>A further aspect of surface access provision to LLA which it is contended has not been afforded the necessary weight in the submission of the DCO application submitted on behalf of Luton Rising concerns the rise in recent years of a number of technological platforms, which match drivers with car parking spaces</p>	<p>Whilst explicit consideration has not been given to ride-sharing platforms in terms of the transport modelling, this is expected to result in a robust analysis of the highway network as ride sharing may result in a reduction of vehicles on the network.</p>

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		<p>through their websites and apps, representing part of what has been referred to as the “sharing economy”. It is operated in the same way that historically AirBnB has helped people share their houses with holidaymakers, or Uber and Lyft have allowed drivers to share their cars with passengers.</p>	<p>Whilst it is not possible to specifically allow for driveway parking within the traffic modelling, movements associated with existing driveway parking would have been picked up within the ‘base’ traffic surveys, and potential growth in these movements would be allowed for as part of the background growth applied to traffic flows.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>TNCs comprise the first of a number of new mobility options which in time may include connected or autonomous vehicles (CAVs). TNCs generate substantially less revenue per passenger than on-airport parking, taxis and rental cars, effectively cutting the airport’s income. Research relating to New York’s three airports supports the view that TNCs have resulted in a sizeable reduction in on-airport car parking. The same situation is becoming evident at UK airports with their increasing impact gauged by Graphic 3.66 taken from the London Heathrow Surface Access Proposals dated June 2019.</p>	<p>See above response.</p>
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>A number of benefits can be identified from TNCs which offer all the advantages of a traditional taxi service. These include:</p> <ul style="list-style-type: none"> • Uber offers flexibility to drivers in controlling their level of income in accordance with their 	<p>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</p>

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		<p>own working hours, with the driver being the boss.</p> <ul style="list-style-type: none"> • Uber offers flexibility to customers as they can use the application any time whenever they want to book a ride. • Uber is generally secure for passengers making travelling comfortable and safe; • Cost effectiveness. Uber journeys tend to be cheaper than traditional taxis in that they do not have a fixed pricing system. However, it is worth noting that Ubers rely on “surge pricing” which means that pricing either increases or decreases in accordance with demand and supply of customers. <p>The growth of TNCs means that passengers are effectively trading down from a higher trading product or taxi service, to a lower-revenue higher-volume TNC product, with severe implications for airports, in that they face declining financial revenues as TNC usage increases. It is contended that airports must consider the role and impact of pricing as a demand management tool, for example, using pricing to reduce terminal kerbside congestion, directing private vehicles, “kiss-and-fly” mode to different parking areas and improving the use of remote car parks or</p>	<p>use to achieve surface assess and mode share targets.</p>

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		encouraging mode share shifts involving satellite facilities.	
REP1-073: Holiday Extras Ltd	Surface Access	<p>I have previously indicated that LLA's pricing strategy has resulted in unintended consequences, with the cost of mid and long stay on-airport passenger products, resulting in parking in surrounding residential streets. The same conclusion is equally applicable in the event that Luton Rising seek to ensure that trips made by taxi and minicab cater for passengers both arriving and departing LLA.</p> <p>An assessment of responses to airport related passenger car parking on the driveways of residential properties close to the airport involving one technological platform JustPark, reveals that in a number of cases the passenger either walked, or was driven to the airport by the property owner, or ordered a taxi/Uber to transport the customer either to or from LLA to the residential address where their car was kept for the duration of the passenger visit.</p>	<p>The Applicant and operator 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 in surrounding areas.</p>
REP1-073: Holiday Extras Ltd	Surface Access	It follows that whilst the need to ensure that journeys made to and from the airport by taxi/minicab are efficiently organised in the sense of the taxi/minicab not remaining empty on a return trip for understandable	Noted.

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		<p>reasons associated with sustainability considerations; the same process also results in unintended consequences for LLA. Firstly, this process results in a loss of revenue to the airport as a consequence of passengers parking their vehicles on the driveways of properties in surrounding residential areas at predominantly cheaper rates than that offered on-airport. Secondly, it assists those passengers who wish to rely on technological platforms such as JustPark to park their car on the driveways of residential properties, in the knowledge that the airport will be encouraging taxis/Ubbers not to leave the airport without passengers. Thirdly, it actively encourages trips to and from the airport by taxi/Uber, with resultant consequences for congestion, carbon emissions and air quality considerations.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>It should also be noted that where staff car parking was previously located on-airport within the Operational Area Boundary, it has been decanted outside the Operational Area Boundary of London Luton Airport, onto two separate sites east and west of the Luton Airport Parkway railway station.</p>	<p>Noted. Whilst new areas of staff parking are proposed within Car Parks P1 and P2, an additional staff parking facility is proposed within Car Park P9 which seeks to rationalise and extend the current parking provision in this area.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
REP1-073: Holiday Extras Ltd	Surface Access	<p>Car Park P1 is to comprise a new multi-storey to accommodate 1,000 car parking spaces for airport staff only, with Car Park P2 being a surface level car park previously used as a trailer park site occupied by HGV parking and coaches, again for staff car parking purposes only.</p> <p>In this way, Car Parks P1 and P2 are reserved for staff parking to be provided in Phases 2a and 2b. These two proposed staff car parking sites lie in close proximity to Bartlett Square which was previously the subject of an application (Luton BC Ref. No. 18/00271/EIA) for “combined-long/short/staff/mid stay car parks, car hire and valet”, despite an earlier proposal preventing the use of the same land for airport related car parking.</p>	<p>It is the intention of The Applicant to utilise land which lies within their ownership and control, where possible, desirable, or feasible. The two sites of Car Park P1 and P2 are located relatively close to the airport and are considered to lend themselves to staff related parking.</p>
REP1-073: Holiday Extras Ltd	Surface Access	<p>All future mid and long-stay on-airport car parks in Phases 1, 2a and 2b are required to have shuttle buses to transport passengers to the respective terminals, in the same way as is the case with the long term off-airport car parking site operated by Holiday Extras Limited at Slip End.</p> <p>The locations of the various on-airport passenger car parking products over the three phases of the DCO application is</p>	Noted.

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		<p>based on information set out in Figure 8.8, Figure 8.9 and Figure 8.10 taken from Document [TR020001/APP/7.02] Transport Assessment – Part 2 of 4 (subsequently revised in Document AS-123) which are reproduced below.</p> <p>Short stay on-airport car parking in Phases 1 and 2a is provided in the Operational Area Boundary of the existing airport at Car Parks P3 and P4, the latter comprising two multistories. Increased provision for this parking product is provided in Phase 2a at a throughput of 27mppa on a new decked Car Park on land at P5, which itself results in a reduction in car parking capacity on the same land of 1,250 spaces, having previously been used in Phase 1 for long term passenger block parking, where approximately 2,450 spaces were available. In Phase 2b commencing in the first quarter of 2037, additional short stay car parking is provided in a new multi storey Car Park P12 lying outside the Operational Area Boundary of the existing airport providing approximately 2,225 car parking spaces to meet the needs of Terminal 2, but where it is also intended to be used for pick-up/drop-off use including valet parking.</p>	

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		<p>Mid stay on-airport passenger car parking during Phases 1 and 2a is provided on existing Car Park P3 within the Operational Area Boundary of the airport along with the short stay product. Car Park P7 constructed on land forming part of Wigmore Park, beyond the airport's Operational Area Boundary, is also used for mid stay on-airport passenger provision in Phases 1 and 2a.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>Car Park P7 fundamentally changes shape as a consequence of the construction of the second terminal, and the Green Horizons Park development, resulting in a loss of 1,860 spaces, from 3,090 to 1,230 over the two phases, having previously been used for long stay passenger parking in Phase 1. Two new Car Parks P10 and P11 to be used for mid and long stay car parking purposes are constructed on land beyond the Operational Boundary of the airport during Phase 2a, catering for 1,150 and 2,700 spaces respectively. In Phase 2b, mid stay passenger car parking is concentrated on Car Park P3; at Car Park P10 along with long stay, where the capacity is increased to 3,165 spaces, and on existing decked Car park P5 which accommodates 1,200 spaces.</p>	<p>Noted. Parking facilities are proposed in a phased approach to accommodate changes in available area between the three development phases, and to accommodate the Green Horizons Park buildout.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
REP1-073: Holiday Extras Ltd	Surface Access	<p>Long stay on-airport passenger car parking in Phase 1 is retained on Car Park P5 as well as on extended Car Parks P6 and P7 beyond the Operational Area Boundary of the airport. In the same way as Car Park P7, Car Park P6 changes shape primarily as a consequence of the construction of the second terminal, and the Green Horizons Park development, being used for long stay purposes in Phases 1 and 2a, but altering from a self-park to a block parking format in Phase 2a with a resultant increase in capacity from 1,250 to 1,620 available passenger spaces. In Phases 2a, all long term on-airport car parking is provided outside the Operational Area Boundary of the airport on Car Parks P6, P10 and P11. Car Park P10 in Phase 2b is devoted to both mid and short stay passenger car parking being subsequently extended in Phase 2b to 3,165 spaces but where 505 spaces are also used for staff car parking. The capacity of Car Park P11 used for long stay purposes increases from 2,700 to 5,530 spaces in Phase 2b.</p>	<p>Noted.</p> <p>However, Car Park P10 is proposed to be used for Mid / Long stay parking as opposed to Short / Mid stay, and Car Park P11 will have up to 5,350 spaces as opposed to 5,530 as stated in the raised matter.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>There has been no material change in the number of short and long term on-airport passenger car parking spaces today, from that in evidence at the time Project Curium comprising part of Application No. 12/01400/FUL was submitted to Luton Borough Council in December 2012, more than a decade ago. The number of mid-stay on-airport passenger car parking spaces has declined today from the date of submission of same application as a consequence of the subsequent construction of the Luton DART linking the Airport to Luton Parkway railway station. The number of long-term on-airport passenger car parking spaces has remained static over the last 11 years at around 4,500.</p> <p>These considerations are required to be assessed alongside the contents of paragraph 7.32 of the Statement of Case prepared on behalf of Luton Borough Council to Application No. 21/00031/VARCON called in by the Secretary of State which sought variations to earlier conditions attached to Application No. 15/00950/VARCON, as well as accommodating a passenger throughput of 19mppa:</p>	<p>The number of passenger parking spaces proposed at each phase of development have been determined from the baseline of 10,550 parking spaces in 2019, which was the level of on-site car parking required at the point when the airport reached its permitted capacity of 18 mppa, and taking account of the growth in passengers and the assumed reduction in car parking mode share.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>"7.32 The provision of available car parking at the airport is below that which was envisaged in the 2012 application and the rapid growth of the airport has resulted in a greater under provision of available spaces."</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>This comment raised by Luton Borough Council in their Statement of Case concerning the called-in application relating to an expansion of LLA from 18mppa to 19mppa, is required to be seen in the context of both existing and proposed on-airport car parking spaces set out in Table 2 above, as well as in the light of the contents of paragraph 179 and 180 from Leading Counsel's closing submissions to the same called-in application, viz:</p> <p>"179. As to parking for passengers, the Applicant operates four public car parks. Long Stay (4,151 parking spaces), Mid-stay (1,281), TCP1 (1,699), TCP2 (1,924). This totals 9,055 parking spaces. TCP2 opened in 2020 and created an additional 8% capacity. 180. There is also offsite public car parking which is operated by third parties and which the Applicant does not control. As set out in the technical note, of these spaces 1,500 have been added since 2019.</p>	<p>The airport's 2020 Annual Monitoring Report (Ref 5.3) indicates that the total passenger car parking across the Short, Mid and Long stay car parks had reduced since 2019 to 9,055 spaces, a reduction of 1,500 spaces. This reflects a loss of parking at the Mid stay car park due to the construction of Luton DART.</p>

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		<p>Operators of these car parks offer shuttle buses to and from the Airport.”</p> <p>The 9,055 spaces mentioned by Leading Counsel in Closing Submissions on 22nd November of last year is not consistent with the figures set out in the earlier consultation exercises prior to the submission of the current DCO application, as can be noted in columns (2) and (3) in Table 2. Significantly, it is clear that reliance was placed on third parties such as my clients to satisfy airport related passenger car parking requirements at LLA as recently as November 2022.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>The DCO application reveals that from Phase 1 there is a requirement for the airport to use land outside its existing Operational Area Boundary to accommodate mid stay and long stay on-airport passenger car parking requirements, with further extensions westwards during Phases 2a and 2b. Short stay on-airport passenger parking also has to rely on land outside the existing Operational Area Boundary of the airport in Phase 2b.</p>	<p>The Operational Area Boundary of the airport would necessarily change as a result of the provision of a new terminal and expansion of the airfield. The areas used for car parking are within land owned by the Applicant or its shareholder.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
REP1-073: Holiday Extras Ltd	Surface Access	<p>No indication is given of how the number of on-airport passenger car parking spaces required at LLA at a passenger throughput of 21.5mppa, 27mppa and 43mppa has been calculated, including whether consideration has been given to the occupancy/demand ratio, being the number of cars wishing to park at LLA, and the volume of spaces required to service that demand on a monthly basis. What is apparent from the proof of evidence of Mr. J. Ojeil MSc(Eng) FRIHT MCILT in respect of the called-in application Reference No. 21/00031/VARCON is that the ratio of on-airport car parking supply per passenger at the levels quoted is considerably higher than comparable airports displaying similar leisure and business passenger profiles, confirming the conclusions raised by my client that the 16,000 spaces to be made available at a throughput of 32mppa in 2043 is considered to be insufficient.</p> <p>My client would in any event dispute the figure provided by Mr J Ojeil of 1 space per 1,965 passengers which does not equate to a passenger throughput of either 18mppa or 19mppa. What is evident is the ratio of future</p>	<p>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. 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, AS-123, APP-205, 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>

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		<p>on-airport car parking supply, even taking into account short-term provision, amounts to 1 space per 2,000 passengers given an expected 16,000 spaces at a throughput of 32mppa. This has to be compared with London Stansted Airport where on-airport car parking provision at the end of 2017 comprised 30,750 spaces at a passenger throughput of 25.9mppa or a ratio of 1 space per 842 passengers.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access / GCG</p>	<p>It is with these considerations in mind that increased importance should be afforded to companies such as my clients, in meeting any future shortfall in supply at London Luton Airport, irrespective of the interventions that are to form part of the GCG and the provisions of the FTP.</p>	<p>As previously noted, it is not the intention of the Applicant to provide additional car parks in off-site locations as part of the application for development consent. However, the passenger mode split shown in Table 9.5 of the Transport Assessment [APP-203, AS-123, APP-205, APP-206] shows that off-site parking is assumed to form part of the surface access options to access the airport in the future, with the expanded airport.</p> <p>The application does not preclude Holiday Extras Limited or any other off-site car park operator from providing off-site airport car parks. The Applicant would engage with any off-site parking operator if a positive initial response was received from the relevant</p>

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			local planning authority, with regard to additional or extended off-site parking facilities.
REP1-073: Holiday Extras Ltd	Surface Access / GCG	<p>The 55% GCG Limit relating to the air passenger non-sustainable travel mode share at which time LLA is expected to be at full operating capacity, is equivalent to all non-sustainable travel by private car including taxis in 2043, at a passenger throughput of 32mppa. The 39% of passengers relying on private car to access the airport in 2043¹⁷ is commensurate with 12.5 million passengers, being greater than the total passenger throughput at LLA eight years ago, placing into perspective the significance to be attributed to the 55% GCG Limit.</p> <p>¹⁷ 39% figure is derived from Table 9.5 Passenger Mode Split (Person's Trips) as set out in Document 7.02 Transport Assessment – Part 2 of 4 (Chapters 5-8) *amended by AS-123) (made up of all</p>	<p>It is acknowledged that as part of the proposed airport expansion there will inevitably be a proportion of passengers who choose to access the airport by private car, despite the mode share proposals which increasingly favour public transport and sustainable methods of travel. The Transport Assessment [APP-203, AS-123, APP-205, APP-206] has identified offsite highway works required to mitigate the impacts of increased levels of airport traffic, and the Framework Travel Plan [AS-131] sets out how the airport operator is required to set more ambitious mode share targets beyond the levels set by the GCG mode share Limits.</p>

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		private car modes and rental car but not taxis)	
REP1-073: Holiday Extras Ltd	Surface Access / Need Case	No study appears to have been undertaken of anticipated changes in customer behaviour where emphasis has been placed on customer profiling based on the popularity of certain destinations; flying frequency; trip duration and trip frequencies as part of a greater understanding of the cyclical nature of passenger parking demand throughout the year.	The future year passenger mode share assumptions used in the Transport Assessment [APP-203, AS-123, APP-205, APP-206] are forecast from CAA passenger survey data which along with the accessibility of the Airport, would reflect customer air travel behaviour.
REP1-073: Holiday Extras Ltd	Surface Access	The contents of Table ES.1 Proposed Car Parking in Document [TR02001/APP/7.02] Transport Assessment – Part 1 of 4, and Table 8.2 Proposed Assessment Phased Car Parking Provision taken from Document [TR02001/APP/7.02] Transport Assessment – Part 2 of 4 (as revised by AS-123), have been reiterated in columns 4, 5 & 6 of Table 2 accompanying these written representations. These figures are required to be considered in the light of Inset Maps 4.10, 5.36 and 6.6 where they comprise part of Document TR00001/APP/5.02 Appendix 4.1 Construction Method Statement and Programme Report 2 Assessment Phase 1, 2a and 2b Car Park Locations (as revised by AS-082).	<p>Whilst the total number of parking spaces provided within proposed Car parks P6 and P7 reduces from Phase 1 to Phase 2a to accommodate the Green Horizons Park development, it is incorrect to state that there would be a loss of parking provision.</p> <p>Additional areas of parking are proposed at Phase 2a (Car Parks P10 and P11) which offset this loss and provide a net uplift in spaces (Total Mid / Long spaces at Phase 1: 7,275. Total Mid / Long spaces at Phase 2a: 8,400).</p>

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		<p>This exercise reveals that in Phase 1 of the GDO application, at an anticipated passenger throughput of 21.5mppa, a total of 2,485 spaces comprises relocated mid and long stay car parking on Car Parks P6 and P7. Moving forward into Phase 2a, a further reconfiguration of the shapes and capacities of Car Parks P5, P6 and P7 arise, resulting in a total of 2,740 spaces being lost when compared with the same car parks present at the earlier Phase 1. It is relevant to highlight that these spaces do not comprise additional on-airport provision.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>It is important when considering the intended use of on-airport car parks for short, mid and long-term passenger parking purposes, to have regard to the same Inset Maps, to the extent that they confirm that the entirety of certain car parks are not devoted to on-airport passenger car parking purposes. By way of example, Car Park P7 at a passenger throughput of 21.5mppa is not used solely for mid and long stay, whether in terms of either new or relocated provision, but is to cater for relocated car hire and for new employee car parking. In a similar vein, Car Park P10 in Phase 2b at a throughput of</p>	<p>Noted. The car parks referred to in the comment have been designed to provide sufficient space to accommodate the multiple uses specified, through segregation where relevant.</p>

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		<p>32mppa reveals a capacity of 3,165 spaces, of which 700 spaces are to be used for car hire purposes and 505 spaces for staff. In the case of staff car parking, this is in addition to the staff car parking amounting to 1450 spaces to be provided on land currently off airport to the east and west of Luton Parkway railway station in Phase 2a.</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>These figures aside, an important attribute of long term off-airport car parking companies of the type run by Holiday Extras Ltd, operating from lawful sites in the vicinity of LLA, extends beyond issues of airport related car parking demand and supply, or ratios of car parking supply to passenger throughput. Facilities such as that provided at Slip End, ensure a choice for passengers where otherwise passenger related car parking would be dominated by the airport company, with an absence of competition available to recipients of the same use. The importance of this issue becomes apparent from the document produced by the Civil Aviation Authority CAP 1473 entitled "Review of Market Conditions for Surface Access at UK Airports – Final Report" published in 2016, paragraph 4.9 of which is noteworthy.</p>	<p>The application does not preclude Holiday Extras Limited or any other off-site car park operator from providing off-site airport car parks. The Applicant would engage with any off-site parking operator if a positive initial response was received from the relevant local planning authority, with regard to additional or extended off-site parking facilities.</p> <p>The passenger mode split shown in Table 9.5 of the Transport Assessment [APP-203, AS-123, APP-205, APP-206] shows that off-site parking is assumed to form part of the surface access modes used to access the airport in the future, with the expanded airport.</p>

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		<p>"4.9 Under such a market definition, it follows that airport operators generally are present in both the upstream (access to the airport) and downstream (services to get to the airport) levels of the surface access sector. As such the airport operator provides third parties access to facilities that are necessary for them to supply surface access services to passengers, whilst at the same time competing with those third parties in the downstream market. This may mean that airport operators have incentives to favour their own services in granting access to facilities needed by their rivals." (my emphasis)</p>	
<p>REP1-073: Holiday Extras Ltd</p>	<p>Surface Access</p>	<p>See section 10 (Profiling of Passengers Using the Long Term Off-Airport Car Parking Site at Slip End) of Written Representation [REP1-073].</p>	<p>Section 10 looks at the most common UK origins and destinations of users of the Slip End off-site car park at times when public transport options are limited.</p> <p>The need for a variety of access options is recognised by the Airport and this is included in the DCO which allows for a proportion of the passenger demand to use off-site car parks in the future.</p> <p>The DCO does not preclude Holiday Extras Limited or any other off-site car park operator</p>

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			<p>from providing off-site airport car parks, and the Applicant would engage with any off-site parking operator if a positive initial response was received from the relevant local planning authority, with regard to additional or extended off-site parking facilities.</p> <p>In addition, following the submission of the application for development consent, the Applicant has been progressing and developing more detail around bus and coach routes to demonstrate the range of potential opportunities for improving bus and coach access to and from the airport, mapping gaps in current service provision and frequencies. These improvements are being developed in tandem with a Sustainable Transport Fund that will set the framework around how these types of improvements, alongside the others listed out within the toolbox of measures within the Framework Travel Plan [AS-131], would be funded.</p>
REP1-073: Holiday Extras Ltd	Surface Access / GCG	These representations have shown that into the foreseeable future there will continue to be a sizeable proportion of passengers accessing LLA by private car, irrespective of	It is recognised that as part of the proposed airport expansion there will be a proportion of passengers who will access the airport by private car. The DCO offers a number of

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		<p>the well-conceived interventions encompassing GCG and the FTP. Whilst capacity issues seen in the context of the local and strategic highway network, as well as from a public transport perspective are relevant; equal weight has to be placed on the age profiles of passengers particularly whether they involve persons with a mobility impairment or where young children are involved; and the socio-economic group to which they belong. Those competing airports with similar leisure and business passenger profiles which have overlapping catchment areas are relevant as is the need to offer passenger choice in airport related car parking products.</p>	<p>options for accessing the site and allows for a proportion of the passenger demand to use off-site car parks in the future.</p> <p>The DCO does not preclude Holiday Extras Limited or any other off-site car park operator from providing off-site airport car parks, and the Applicant would engage with any off-site parking operator if a positive initial response was received from the relevant local planning authority, with regard to additional or extended off-site parking facilities.</p>

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Michael Reddington	N/A	<p>Note: I have recently become a member of the Noise Insulation Scheme Sub-Committee of the London Luton Airport Consultative Committee, although I submit this Written Representation in a personal capacity</p>	Noted.
Michael Reddington	Climate Change	<p>1.1.1 The Applicant is proposing within this DCO submission to increase throughput at London Luton Airport from 18 mppa to 32mppa between now and 2043 despite there being a climate emergency, national obligations to Net Zero, and the financial and environmental damage.</p>	<p>The UK government has set a legally binding target, under section 1 of the Climate Change Act 2008 (Ref 3.5), to achieve net-zero greenhouse gas emissions by the year 2050 and to meet their five-yearly carbon budgets.</p> <p>It has introduced a range of measures to control carbon. For example, the Jet Zero Strategy (Ref 3.6) is the government strategy on how aviation will contribute to meeting the UK's climate change commitments. Paragraph 3.57 sets out that <i>"we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth"</i>. The modelling behind the Jet Zero Strategy (and the update) incorporated growth at London Luton Airport at the same level as that proposed by the application.</p> <p>The UK Emissions Trading Scheme and the Carbon Offsetting and Reduction Scheme for</p>

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			<p>International Aviation are other tools to control carbon emissions.</p> <p>An assessment of changes to greenhouse gases due to the Proposed Development is provided in Chapter 12 Greenhouse Gases [APP-038] of the Environmental Statement (ES). This includes an assessment of the Proposed Development's emissions against the UK's carbon budgets, net zero target and alignment with the UK Government's Jet Zero Strategy in section 12.11.</p> <p>The analysis in this chapter concludes that aviation emissions from the Proposed Development never account for more than 3.24% of aviation emissions within the Jet Zero Strategy High Ambition scenario. This is illustrated in Table 12.24.</p> <p>Paragraph 5.82 of the Airports National Policy Statement (Ref 3.7) sets out that <i>"Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets."</i></p>

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			<p>The Proposed Development will not have a material impact on the Government's ability to meet its climate change targets and budgets.</p> <p>With regard to the more general point about financial and environmental damage, mitigation measures are set out in the Environmental Statement and they will be funded by the Applicant, as set out in the Funding Statement.</p>
	Landscape and Visual	1.1.2 The Applicant is proposing to destroy a mature country park as part of the construction process.	The Applicant considers that the issue raised regarding the partial loss of Wigmore Valley Park was answered within the Applicant's Response to Relevant Representations Part 2C of 4 (Non-Statutory Organisations) [REP1-023] page 80, in response to RR-0472 and others.
Michael Reddington	Planning	1.1.3 As a long-term resident of Wigmore since 1994, I have seen the airport grow almost uncontrolled from some 1.9 million passengers per annum (mppa) to 18mppa in 2019, pre-Covid.	Noted. The planning history of the airport and that of the wider Application Site, including an overview of the key controls attached to the relevant permissions, is set out in Section 4 of the Planning Statement [AS-122] .
Michael Reddington	Noise	1.1.4 There is almost constant ground noise at night and during the day as well as the noise of arriving and departing aircraft. Our property backs onto a park which itself	The impact of air and ground noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise

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		<p>is in line with the north east end of the runway. We can see arriving and departing aircraft just after take-off and just before landing, when the noise it at its loudest.</p> <p>1.1.5 We have to sleep in the front bedroom but visitors cannot use the back bedrooms because of night noise. Even so there is no respite in the front because a neighbour's house across the street is oriented at 90 degrees to ours, and airport noise bounces off the solid gable wall which is a perfect sound reflector.</p> <p>1.1.6 We cannot relax in our garden because of the noise, especially on weekends when there appears to be no break at all.</p>	<p>impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>
Michael Reddington	Air Quality	<p>1.1.7 I believe there is fuel 'dumping' due to the acrid smell and taste of volatile compounds.</p>	<p>The Applicant considers that the issue raised regarding the odour impacts, was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 9, in response to RR-0677 and others.</p> <p>As agreed with PINS during scoping, fuel jettisoning is scoped out on the basis that the jettisoning of fuel from aircraft is only undertaken in emergency scenarios, when an</p>

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			aircraft is required to undertaken an emergency landing. Jettisoning of fuel will usually occur over water and at high altitude in order to vaporise the fuel and facilitate dispersion.
Michael Reddington	Surface Access	1.1.8 There is widespread illegal parking on public roads, probably due to the high parking charges at the airport. Luton Borough Council's response is to start to implement residential parking permit schemes, i.e. residents now have to pay an added tax because of the airport's charges rather than LBC policing illegal parking using wardens, and hypothecating the fines.	The Applicant and airport operator will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as set out within the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) (Appendix I of the Transport Assessment [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 in local areas, in order to dissuade vehicles from using these roads to access the airport.
Michael Reddington	General	1.1.9 Therefore I object to these DCO proposals unreservedly.	Noted.
Michael Reddington	Compensation	1.2.1 Despite all these major inconveniences set out above, we do not qualify for any sort of compensation such as insulation because of the criteria used by the Applicant.	There are statutory entitlements for residents to claim compensation for any diminution in value of their properties which is proven to arise because of the physical factors emanating from the new public works.

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			The right to claim compensation under Part I of the Land Compensation Act 1973 (Ref 3.8) is subject to satisfying prescribed criteria but is not geographically limited. The Applicant has developed a compensation policy which extends beyond that required by statute and this is intended to help protect those who would be most affected by the Proposed Development.
Michael Reddington	Consultation and Stakeholder Engagement	1.2.2 The DCO consists of some 25,000 pages, a significant portion of which contains detailed technical data. It is almost impossible for a layperson to provide a comprehensive set of comments against the entire DCO.	Noted. Included with the application was the Non-Technical Summary of the Environmental Statement [APP-165] Which is intended to provide an overview of the application in plainer, less technical English, for the public.
Michael Reddington	Noise / compensation	1.2.3 Instead, this Written Representation confines itself to comments on noise mitigation through insulation.	Noted.
Michael Reddington	Noise / Compensation	1.3.1 The Applicant's insulation proposals and eligibility criteria are not fit for purpose. They are lacking in detail, optimistic, incomplete, even contradictory, and do not meet the requirements of quoted DCO reference documentation.	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, and all properties exposed above the daytime and night-time Significant Observed

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		<p>1.3.2 As an example, the Applicant excludes Ground Noise from insulation eligibility criteria contrary to the Luton Local Plan.</p> <p>1.3.3 There are no commitments to a prioritised programme of insulation works just a vague comment that there may be delays in getting insulation installed.</p> <p>1.3.4 The insulation proposals rely heavily on dB LAeq T contours which are averages, and do not take account of the physiological and psychological effects of individual noise events particularly at night time.</p> <p>1.3.5 The proposals do not consider internal noise levels within properties, their limits and testing methodology nor the treatment of 'legacy properties that have already had insulation.</p> <p>1.3.6 It is my concern that this situation will not improve should the Applicant be successful in his current DCO submission (ref. performance under Project Curium, below) so I have put forward a suggested testing methodology in Section 6.</p>	<p>Adverse Effect Level (SOAEL) will be eligible for a full package of noise insulation (i.e. the resident will not need to fund any of the insulation works). See Draft Compensation Policies Measures and Community First [for further details.</p> <p>The proposed insulation scheme has been agreed as appropriate with the host authorities in the draft Statements of Common Ground [TR020001/APP/8.13-8.17].</p> <p>It is not agreed that not including ground noise eligibility criteria is contrary to the Luton Local Plan (Ref 3.9). The proposed air noise insulation scheme goes above and beyond policy expectations and has been enhanced to avoid significant adverse effects from the Proposed Development. The small number of properties exposed above the ground noise SOAEL with the Proposed Development are also exposed above the air noise SOAEL and would therefore be eligible for a full package of noise insulation. As a result, there are no significant effects identified for ground noise in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003] and it is not considered</p>

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			<p>necessary to define a separate ground noise insulation scheme.</p> <p>The Draft Compensation Policies Measures and Community First document contains a commitment, in paragraph 6.1.14 to prioritise the most affected properties within the latest 63dBL_{Aeq,16h} and 55dBL_{Aeq,8h} contours and introduce each scheme as efforts to insulate those in worst affected contours are complete.</p> <p>In line with Government noise policy (Ref 3.10), eligibility for the noise insulation schemes is determined based on L_{Aeq} noise exposure. UK specific research from the Civil Aviation Authority (Ref 3.11, Ref 3.12) shows that there is no evidence to suggest that any noise indicators correlate better with the principal health effects from aircraft noise (daytime annoyance and night-time sleep disturbance) than the L_{Aeq} metric.</p> <p>A survey will be undertaken at each eligible property to determine the scope of works required. Properties that have already had insulation installed will be eligible under the new scheme. In any subsequent offer for noise</p>

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			insulation, the Applicant reserves the right to reflect any previous noise insulation compensation payment already made.
Michael Reddington	N/A	<p>1.4.1 This Written Representation provides comments upon, and a detailed cross reference to, the Applicant's documents and other relevant data sources:</p> <p>Section 2: AS080 (Chapter 16: Noise and Vibration Rev 1) Comments</p> <p>Section 3: AS096 (Chapter 16.1 Noise and Vibration Information Rev 1) Comments</p> <p>Section 4: Chapter 16.2 Operational Noise Management Plan Comments</p> <p>Section 5: AS128 (Chapter 7.10 Compensation Policy and Measures Rev 2) Comments</p> <p>Section 6: App 5.02 Appendix 5.3 Noise Requirements and Compliance CAP 1616A Comments</p> <p>1.4.2 Section 7: CAP 1588:2018 "Aircraft Noise and Annoyance: Recent findings"</p>	Noted.
Michael Reddington	Planning	<p>1.4.3 It is hoped that the ExA will ask the Applicant to provide a comprehensive proposal that responds to observations raised and provide full relevant details.</p>	<p>Noted.</p> <p>The Applicant considers that the proposals set out within the application are comprehensive and appropriate.</p>

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Michael Reddington	Noise	<p>1.4.4 It is hoped that the ExA will ask the Applicant will take into consideration CAP 1588: "Aircraft Noise and Annoyance: Recent findings" (Ref. 6) which is summarised in Section 7 and provides guidance on how annoyance is measured and what actions could be taken to mitigate noise impacts.</p>	<p>The referenced document is a summary of research and does not provide any guidance on how this should be applied to noise assessments or policy making decisions. The more recently published CAP 1506 Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition (Ref 11, published in 2021), does provide such guidance and notes the outcomes of their UK specific research that "<i>There was no evidence found to suggest that any of the other indicators Lden, N70 or N65 (r2=0.66-0.73) correlated better with annoyance than LAeq,16h</i>" and that "<i>evidence-based decisions should continue to use LAeq,16h</i>".</p>
Michael Reddington	Noise / Compensation	<p>1.5.1 The Government initiated the Independent Commission on Civil Aviation Noise (ICCAN) to provide best practice, in the mitigation of aircraft noise in properties. ICCAN produced a number of recommendations in their document "ICCAN review of airport noise insulation schemes March 2021" (Ref 7) but was then disbanded and subsumed into CAP 1616A which has not been updated.</p>	<p>This is acknowledged. ICCAN has been disbanded and that some of its functions have been taken over by the Civil Aviation Authority since April 2022. CAP1616A is a specific technical annex published by the Civil Aviation Authority and relates to the environmental assessment of airspace change. It is not related to ICCAN's role.</p>
Michael Reddington	Noise / Compensation	<p>1.5.2 It was expected that the Applicant would produce an insulation test programme as part of the DCO to back up</p>	<p>The Draft Compensation Policies, Measures and Community First has been updated to note that a proportionate testing policy will be</p>

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		the Compensation event of insulation provision. No such test programme has been forthcoming so the Applicant does not have a strategy to determine (a) what is being insulated; (b) whether the insulation is effective or (c) whether best practice is being followed.	developed to monitor and as necessary improve the quality control of the scheme going forward. The testing regime will be developed in consultation with the London Luton Airport Consultative Committee and having regard to best practice.
Michael Reddington	Noise / Compensation	<p>1.6.1 The Applicant has so far failed to carry out the requisite testing on insulation provided as part of Project Curium, despite achieving the maximum 18mppa by 2019 with attendant noise increases.</p> <p>1.6.2 An insulation programme should have had similar momentum to the increase in passenger numbers but there was no commensurate prioritisation.</p> <p>1.6.3 It is acknowledged that long-term exposure to noise is damaging to health yet many residents of Luton have not had noise mitigation via insulation, even where eligible. Nor has a testing regime been carried out to confirm insulation efficacy.</p>	<p>The current insulation scheme is not part of the Proposed Development. That said the airport operator has confirmed that whilst there is no obligation to test following installation of insulation provided under the current policy sample testing has been carried out.</p> <p>See response to 1.5.2 with regards to testing of the proposed insulation scheme for the Proposed Development.</p>
Michael Reddington	N/A	<p>2.1.1 Page 1 Footnote</p> <p>2.1.1.1 For the avoidance of doubt the following definitions apply throughout this document: " 1. Air noise is defined as noise emissions from all aircraft movements in</p>	Noted. This is consistent with the definition used in Chapter 16 Noise and vibration of the Environmental Statement [REP1-003] .

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		<p>the landing and take-off cycle associated with the airport 2. Ground noise is defined as noise emissions from aircraft taxiing between stand and runway, engine testing, Auxiliary Power Units (APU) and fire training ground activities “</p>	
<p>Michael Reddington</p>	<p>Noise / Compensation</p>	<p>2.1.2 Page 9: Table 16.2 2.1.2.1 Paragraph 2.24 of NPSE states: “The second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL. It requires that all reasonable steps should be taken to mitigate and minimise negative effects on health and quality of life while also taking into account the guiding principles of sustainable development (paragraph 1.8). This does not mean that such negative effects cannot occur” 2.1.2.2 Daytime eligibility criterion for insulation is 54dB LAeq,16h i.e. it lies between Daytime LOAEL of 51dB LAeq and Daytime SOAEL of 63dB LAeq, so meeting the requirement. 2.1.2.3 However, for Night-time noise there is no eligibility for insulation between LOAEL (45dB LAeq 8h) and SOAEL (55dB</p>	<p>Properties exposed between the night-time LOAEL and SOAEL would be eligible for insulation under the daytime schemes. See for example paragraph 16.9.147 of Chapter 16 Noise and vibration of the Environmental Statement [REP1-003] which notes that 13,250 people between the night-time Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) in assessment Phase 1 would be eligible for noise insulation.</p> <p>Section 2 of Appendix 16.2 of the Environmental Statement [APP-111] sets out how the approach to mitigation for the Proposed Development meets the three aims of the Noise Policy Statement for England (NPSE) (Ref 10). There is no policy requirement to provide noise insulation between the LOAEL and the SOAEL. This is evidenced by aviation noise policy (Ref 3.13) which only expects airport operators to</p>

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		<p>L_{Aeq, 8h}), so there is no provision made for levels between LOAEL and SOAEL.</p> <p>2.1.2.4 Therefore the proposal does not meet NPSE paragraph 2.24 for levels between LOAEL and SOAEL. (Levels above UAEL are treated separately by either Voluntary Acquisition or Hardship)</p>	<p>provide noise insulation above 63dB_{L_{Aeq,16h}} (SOAEL). The proposed noise insulation schemes go beyond these policy expectations.</p> <p>The noise management measures embedded into the Proposed Development collectively meet the second and third aims of Government noise policy to mitigate and minimise adverse effects on health and quality of life from noise and where possible contribute to improvements in health and quality of life from noise, and contribute to meeting the first aim, all within the context of Government policy on sustainable development.</p> <p>The compensatory mitigation measures (see Draft Compensation Policies, Measures and Community First [have been developed so that in combination with the embedded noise management measures, together they meet the first aim of Government noise policy to avoid significant adverse effects on health and quality of life from noise. This is achieved through the noise insulation scheme which provides a full package of noise insulation where air noise exposure from the development exceeds the relevant SOAEL values.</p>

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Michael Reddington	Noise / Fleetmix	<p>2.1.3 Page 11: Table 16.2 'The Aviation Policy Framework (APF) (2013) (ref. 16.18)' – response</p> <p>2.1.3.1 Currently there is no Next generation technology and this is unlikely to be in general circulation until the mid 2030s. More importantly however; there is no guarantee that it will reduce noise.</p>	<p>Information from the International Civil Aviation Organization suggests that next-generation aircraft will continue to show reduction in noise (Ref 3.14), see Section 12.6 of Appendix 16.1 of the Environmental Statement [AS-096] for further information. However, as a reasonable worst case the noise assessment in Chapter 16 of the Environmental Statement [REP1-003] assumes that next-generation aircraft will be no quieter than the new-generation aircraft that they replace.</p>
Michael Reddington	Planning / Local Environment	<p>2.1.4 Page 12: Table 16.2</p> <p>2.1.4.1 'Beyond the horizon, The future of UK aviation: Making best use of existing runways (2018) (Ref. 16.22) ' The Applicant uses the 'making best use of existing runways' to argue for this egregious expansion to 32mppa, construction of a new terminal and the destruction of a country wildlife park.</p>	<p>The Applicant considers that the issue raised regarding Wigmore Valley Park and the County Wildlife Site was answered within the Applicant's Response to Relevant Representations Part 2C of 4 (Non-statutory Organisations [REP1-023] page 80, in response to RR-0472.</p>
Michael Reddington	Planning / Need Case	<p>2.1.4.2 However This document does not anticipate major increases in airports outside Heathrow for 'making most efficient use of runways'. Paragraph 1.28 states: "Given the likely increase in ATMs that could be achieved through making best use of existing runways is relatively small</p>	<p>The demand forecasts underpinning the Making Best Use policy (Ref 3.15) did take into account the potential for London Luton Airport to increase its capacity to 32 mppa.</p> <p>This information was provided to the Manston Airport DCO Examination in representation</p>

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		(2% increase in ATMs “without Heathrow expansion” scenario; 1% “with Heathrow”), we do not expect that the policy will have significant implications for our overall airspace capacity.....”	<p>TR020002-004969 submitted following Deadline 11 at page 1098, where London Luton Airport is shown as attaining 32.5 mppa in the Department for Transport’s modelling.</p> <p>The reason that the level of movements overall does not increase substantially is that allowing airports to make best use of their existing capacity means that more of the total passenger demand can be met at airports local to them thereby reducing surface access journeys but, in combination with the assumed construction of a third runway at Heathrow, there is limited unmet demand overall in the DfT forecasts in 2018.</p>
Michael Reddington	Noise / Compensation	<p>2.1.5 Page 15: Table 16.2 (in respect of insulation)</p> <p>2.1.5.1 'Levels of Contributions affecting take-up'. There has been no assessment by the Applicant during or after the expansion from 9mppa to 18mppa n of levels of take up, whether it is acceptable or not, and the underlying reasons We have no confidence that the Applicant will be any more proactive this time round.</p>	<p>The current insulation scheme is not part of the Proposed Development. That said we understand take up statistics are reported in the quarterly monitoring reports issued by the operator.</p> <p>With regards to the insulation scheme for the Proposed Development, the Draft Compensation Policies, Measures and Community First has been updated to include further information on the proactive approach that will be adopted by the Applicant to ensure</p>

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			both knowledge and availability of the offer has been clearly and openly communicated.
Michael Reddington	Noise / Compensation	<p>2.1.6 Page 15: Table 16.2 (in respect of insulation)</p> <p>2.1.6.1 The Government disbanded ICCAN and subsumed it into CAP 1616. CAP1616 deals with Airspace Changes which is a national issue, not insulation which is a local and completely different issue, and is therefore not the most obvious forum for this topic. We have included a section on ICCAN recommendations later in this document</p>	<p>ICCAN has been disbanded and some of its functions have been taken over by the Civil Aviation Authority since April 2022. CAP1616A is a specific technical annex published by the Civil Aviation Authority and relates to their requirements for the environmental assessment of airspace change. It is not related to ICCAN's historic role.</p>
Michael Reddington	Noise / Compensation	<p>2.1.7 Page 15: Table 16.2 (in respect of insulation)</p> <p>2.1.7.1 '...54dB LAeq 16hr contour or above as a new eligibility criterion for assistance with noise insulation.' This statement sets out a reduced level of noise as an insulation eligibility criterion for DAYTIME noise (and is reflected in the compensation criteria later on) but there is no mention of a similar reduction for NIGHT-TIME noise level eligibility. See also comment under Page 9 above (NPSE paragraph 2.24).</p>	<p>It has not been necessary to define multiple night-time eligibility criterion as they would overlap and/or duplicate the daytime criterion. Properties exposed between the night-time LOAEL and SOAEL would be eligible for insulation under the daytime schemes. See for example paragraph 16.9.147 of Chapter 16 Noise and vibration of the Environmental Statement [REP1-003] which notes that 13,250 people between the night-time LOAEL and SOAEL in assessment Phase 1 would be eligible for noise insulation.</p>

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Michael Reddington	Planning / Need Case	<p>2.1.8 Page 17: 16.2.4</p> <p>2.1.8.1 The Applicant picks and chooses elements of the ANPS to suit his argument, for example giving voice to the 'making best use of existing runways' but ignoring the restriction on night flights at Heathrow's third runway.</p>	<p>The proposals for a restriction on night flying for 6.5 hours at Heathrow was specific to the Heathrow third runway proposal.</p> <p>No such restrictions are in place at Heathrow currently with two runways nor at the other London airports where Government controls are in force at Gatwick and Stansted.</p>
Michael Reddington	Noise / Compensation	<p>2.1.9 Page 18: Table 16.3</p> <p>2.1.9.1 'Provision of noise insulation...' It may help within dwellings but no provision has been made to reduce external noise in gardens or on balconies, such as a reduction in night flights.</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). These aspects of the mitigation hierarchy benefits both indoor spaces (whether windows are opened or closed) and outdoor spaces (e.g. gardens, balconies and public spaces). Only once these mitigations have been employed is mitigation by compensation (noise insulation) provided to avoid any residual significant effects.</p> <p>The impact of noise due to night flights from the Proposed Development has been assessed and</p>

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			<p>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 [AS-080].</p> <p>The Noise Envelope (see Green Controlled Growth Explanatory Note [APP-217]) contains a legally binding framework of night-time noise 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>
Michael Reddington	Noise	<p>2.1.10 Page 25: Table 16.4</p> <p>2.1.10.1 WHO Night Noise guidelines are discussed in this document under CAP 1616 issues (Section 6).</p>	Noted.
Michael Reddington	Noise	<p>2.1.11 Page 30: Table 16.5 Paragraph 4.5.10</p> <p>2.1.11.1 Noted that BS5228 is referenced for Construction noise, but not referenced for Air or Ground noise within premises.</p>	BS5228 Code of practice for noise and vibration control on construction and open sites (Ref 3.16) is specific to construction and not relevant to aircraft air or ground noise.
Michael Reddington	Noise / Compensation	<p>2.1.12 Page 31: Table 16.5 Paragraph 4.5.14</p> <p>2.1.12.1 The Applicant has altered significantly the eligibility criteria and</p>	Changes to the insulation scheme are set out in Section 16.10 of Chapter 16 of the Environmental Statement [REP1-003] which notes that <i>“As part of the Proposed Development, the current air noise insulation</i>

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		<p>provisions for insulation compared to the existing policy, without justification. The Applicant thus fails to meet Paragraph 4.5.14.</p> <p>2.1.12.2 Of particular concern is that the Applicant refers to the existing 'Air Noise' insulation policy except that existing policy includes insulation against Ground noise as well as Air noise. These alterations are discussed under Chapter 7.10 'Compensation'.</p> <p>2.1.12.3 Current eligibility criteria for insulation in Residential properties:</p> <ul style="list-style-type: none"> • Air Noise Daytime: Habitable rooms within the 63dB LAeq 16h contour • Air Noise Night-time: Habitable rooms within the 55dB LAeq 8h contour • Ground Noise Daytime: Bedrooms within the 55dB LAeq 16h contour • Ground Noise Night-time: Bedrooms within the 45dB LAeq 8h contour • Any property experiencing noise greater than 90dB SEL at least once per night <p>Note 1: Noise levels stated are external to properties, not internal to properties</p>	<p><i>scheme administered by LLAOL will be updated if development consent is granted. The updated noise insulation scheme improves on the current scheme and goes beyond the government proposals set out in Aviation 2050."</i></p> <p>The proposed air noise insulation scheme goes above and beyond policy expectations and has been enhanced to avoid significant adverse effects from the Proposed Development. The small number of properties exposed above the ground noise SOAEL with the Proposed Development are also exposed above the air noise SOAEL and would therefore be eligible for a full package of noise insulation. As a result, there are no significant effects identified for ground noise in Chapter 16 Noise and Vibration of the Environmental Statement [AS-080] and it is not considered necessary to define a separate ground noise insulation scheme.</p>

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		<p>Note 2: There are sliding scales of compensation related to noise levels</p> <p>Note 3: The threshold for Ground Noise is 10dB lower than that for Air Noise.</p>	
Michael Reddington	Construction / Noise	<p>2.1.13 Page 33: 16.3.11</p> <p>2.1.13.1 Ground Noise study area is included with the Construction Noise study area. Construction is a temporary phenomenon (if one can call 14 years 'temporary), the other is Permanent. Noise monitors placed along Eaton Green Road area only. The Applicant does not state how long will these monitors stay in situ and how will the outputs be recorded and disseminated.</p>	<p>It is agreed that construction noise is temporary whereas ground noise is ongoing. This has informed the assessment methodology and criteria, which are different for construction and ground noise, as described in Section 16.5 of Chapter 16 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 and duration of their portable monitors. When deciding on a location/duration 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. Noise monitoring data is made publicly available through Community Noise Reports on the airport's website. LLAOL</p>

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			also publish a schedule of community noise monitoring on their website.
Michael Reddington	Construction / Noise	<p>2.1.14 Page: 34: Table 16.6</p> <p>2.1.14.1 The Construction Programme shows construction taking place for eleven years between 2025 and 2040. There is a big gap between 2027 and 2033 when allegedly no construction operatives will be on site. However through incentivisation by LBC I have seen acceleration in airport throughput between 2014 and 2019 which was not supposed to take place until 2028 and which resulted in exceeding noise limits. I assume this situation should be managed under 'Green Controlled Growth'.</p>	<p>Assessment phasing took into account not only the development of demand as discussed with the Need Case [AS-125] but also the length and nature of current commercial agreements in leading to a strategy for expanding T1 capacity before the major development of a second terminal. The suggested acceleration is not deliverable under the terms of those agreements. Irrespective of commercial agreements, growth at the airport under the Proposed Development could only take place within the limits set within the Green Controlled Growth Framework [APP-218].</p> <p>The Noise Envelope (see Green Controlled Growth Explanatory Note [APP-217]) has been designed to improve upon the existing noise control regime and to effectively prevent breaches from occurring. 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 further</p>

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			elaborated on in the Comparison of consented and proposed operational noise controls document [AS-121] which 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.
Michael Reddington	Noise	<p>2.1.15 Page: 35 Footnote 7</p> <p>2.1.15.1 It is all very well having a place of 'tranquillity' but this cannot normally be accessed after dark or during inclement weather. What residents need is 'tranquillity' in their own property.</p>	The impact of noise from the Proposed Development on residential properties 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 [AS-080] .
Michael Reddington	Surface Access	<p>2.1.16 Page 42:16.3.19</p> <p>2.1.16.1 The Local Authority (LBC) should undertake that they will maintain the highway outside the Proposed development to the same high standard as within.</p>	This is a matter for the relevant highway authority. The highway authority would be responsible for upkeep and maintenance of all adopted highway areas.
Michael Reddington	Noise	<p>2.1.17 Page 56: 16.5.55 final sentence</p> <p>2.1.17.1 Luton Airport expanded from 2014 to 2019 with little mitigation (and breached</p>	The Noise Envelope (see Green Controlled Growth Explanatory Note [APP-217]) has been designed to improve upon the existing noise

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		<p>noise limits on several occasions). Therefore already high levels of noise are being increased.</p>	<p>control regime and to effectively prevent breaches from occurring. 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 further elaborated on in the Comparison of consented and proposed operational noise controls document [AS-121] which 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>
Michael Reddington	Fleetmix / Noise	<p>2.1.18 Page 65: 16.6.9 2.1.18.1 Sensitivity tests assume next generation aircraft will be no noisier than current aircraft and maybe even a little bit quieter. The Applicant has carried out a sensitivity test assuming quieter aircraft but has neglected to do the same for aircraft being noisier.</p>	<p>Information from the International Civil Aviation Organization suggests that next-generation aircraft will continue to show reduction in noise (Ref 3.17), see Section 12.6 of Appendix 16.1 of the Environmental Statement [AS-096] for further information.</p>

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			<p>However, as a reasonable worst case the noise assessment in Chapter 16 of the Environmental Statement [REP1-003] assumes that next-generation aircraft will be no quieter than the new-generation aircraft that they replace. The Noise Envelope Limits in the Green Controlled Growth Framework [APP-218] have therefore been set on the same assumption that next-generation aircraft are no quieter than new-generation aircraft.</p> <p>In the instance that next-generation aircraft are noisier (which is not expected to be the case) then other mitigations would need to be employed to offset this increase and stay within the Noise Envelope Limits. It is therefore not considered necessary to undertake such a sensitivity test.</p>
Michael Reddington	Noise	<p>2.1.19 Page 68: 16.6.18 Ground Noise model assumptions and limitations 2.1.19.1 DCO states: “ 16.6.18 Ground noise modelling is limited to predictions, and it has not been possible to validate the predictions to the same extent as air noise due to the dominance of air noise and the inability to distinguish between ground noise and air noise from noise monitoring</p>	<p>Although air and ground noise both originate from aircraft, it is recognised that the nature of noise is different from aircraft when they are in the air and on the ground (for example direction and duration). There is no specific research or guidance on how ground noise should be assessed; however, there is considered to be a sufficient link between assessing the effects of air and ground noise due to the emissions</p>

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		<p>terminal data. " Paragraph 16.6.19 sets out the underlying assumptions.</p> <p>2.1.19.2 Note 1: Figures are Based on Predictions not Actuals.</p> <p>2.1.19.3 Note 2: Ground noise is more long-term than air noise which although dominant tends to dissipate quickly My experience is that I can hear ground noise almost continuously on busy days, interspersed with the take-off and landing noise which lasts a short time but which is much louder.</p>	<p>originating from the same source. Consequently, in the absence of any specific guidance for ground noise, the assessment methodology for air noise is considered applicable to ground noise.</p> <p>This approach has been agreed with the Host Authorities in the draft Statements of Common Ground [TR020001/APP/8.13-8.17].</p>
Michael Reddington	Noise	<p>2.1.20 Page 71: 16.7.2</p> <p>2.1.20.1 Paragraph states: '....it can be concluded that there are no significant effects for any other receptors in the study area'. The Applicant does not specify what would happen if significant ground noise was detected.</p>	<p>The overall approach to identifying, mitigating and reporting significant effects is outlined in Chapter 5 Approach to the assessment [AS-075] of the Environmental Statement.</p>
Michael Reddington	Noise	<p>2.1.21 Page 77: 16.7.17</p> <p>2.1.21.1 Noise contour tables are presented in Tables 16.26, 16.34, 16.41, 16.48: 'Evolution of daytime air noise baseline' and Tables 16.27, 16.35, 16.42, 16:49: 'Evolution of night-time air noise baseline' for the DM and DS scenarios.</p>	<p>The methodology for determining adverse likely significant effects between the Do-Minimum and Do-Something scenarios is presented in Section 16.5 of Chapter 16 [REP1-003] of the Environmental Statement and has been agreed with the Host Authorities as noted in the draft Statements of Common Ground [TR020001/APP/8.13-8.17]. The conclusions of</p>

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		<p>2.1.21.2 However, it is not until the data are presented in graphical form (below) that the true scale of the affected area is revealed. Note this is the area affected by Air Noise contours only and does not include other effects such as Ground Noise and other sources, nor the cumulative effect of them. The overall impression given by the Applicant is that these changes are 'insignificant'. Clearly they are not, and more residents will be affected.</p>	<p>the assessment are the same whether or not they are presented graphically.</p>
Michael Reddington	Noise	[See <i>Daylight Noise Contour dB L Aeq,16h</i> : 'Do Minimum' graph in submission.]	See response above.
Michael Reddington	Noise	[See Daylight Noise Contour dB LAeq,16h: 'Do Something' graph in submission]	See response above.
Michael Reddington	Noise	[See Night-time Noise Contour dB L Aeq,8h: 'Do Minimum' graph in submission]	See response above.
Michael Reddington	Noise	[See Night-time Noise Contour dB L Aeq,8h:'Do Something' graph in submission]	See response above.
Michael Reddington	Noise	[See Daytime Increase (Decrease) in Contour Area (km ²) for 'DS' graph in submission]	This graph appears to show the contour areas for the daytime Do-Something scenario increasing from the 2019 Actuals baseline. This

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			is not the case as the contour areas in each Do-Something scenario are smaller than the 2019 Actuals Baseline. See Tables 16.34, 16.41 and 16.48 of Chapter 16 of the Environmental Statement [REP1-003] .
Michael Reddington	Noise	[See Night-time Increase (Decrease) in Contour Area (km ²) for 'DS' graph in submission]	This graph appears to show the contour areas for the night-time Do-Something scenario increasing from the 2019 Actuals baseline. This is not the case as the contour areas in each Do-Something scenario are smaller than the 2019 Actuals Baseline. See Tables 16.35, 16.42 and 16.49 of Chapter 16 of the Environmental Statement [REP1-003] .
Michael Reddington	Noise	<p>2.1.22 Page 83:16.8.12 Airbus A321 Neo</p> <p>2.1.22.1 The noise from this aircraft, measured by the Airport Operator in some locations, has been louder than that of the A321CEO at the same location, and it offers no perceptible noise reduction particularly on arrivals.</p>	The position regarding some variants of the A321Neo is noted. Through discussions with the airport operator and airline operators, it has become apparent that the poor performance is restricted to a particular engine variant of the A321Neo, and other engine variants perform as would be expected from noise certification testing. Measured noise data was used to predict A321Neo (assessment Phase 1) noise in the 2027 scenario; however, it is assumed that, by 2039, any issues with the A321Neo performance would be resolved through fleet transition to equivalent aircraft that are no worse than the expected performance from noise

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			certification testing. Consequently, A321Neo predictions for the 2039 and 2043 scenarios were modelled based on the modelling methodology referenced from the Air Noise and Performance (ANP) database (Ref 3.18). See Appendix 16.1 of the Environmental Statement [AS-096] for further information.
Michael Reddington	Noise	<p>2.1.23 Page 84: 16.8.19</p> <p>2.1.23.1 No specification provided as to the attenuation provided by the acoustic barrier.</p> <p>2.1.23.2 It is assumed that Ground noise contours for the 2027 DS scenario onwards includes the effect of this barrier in any case</p>	The attenuation for the acoustic barrier will be different for every combination of source and receiver (location and frequency content). It is not possible to define a single specification. It is correct that the DS for each assessment phase includes the effect of the barrier.
Michael Reddington	Noise / Surface Access	<p>2.1.24 Page 85: 16.8.22</p> <p>2.1.24.1 It is not clear what type of environmental/noise barrier and its performance will be installed on the Airport Access Road (AAR) to minimise noise onto Eaton Green Road.</p>	The Airport Access Road would be constructed with a low noise, thin surface course system (see Section 16.8 of Chapter 16 of the Environmental Statement [REP1-003]) which would minimise noise onto Eaton Green Road. This commitment is secured via Design Principle HW.04 [APP-225] . No further requirement for mitigation has been identified and a noise barrier between the Airport Access Road and Eaton Green Road is not proposed.
Michael Reddington	Noise	2.1.25 Page 88:16.9.9	See paragraph 6.1.28 onwards of Draft Compensation Policies Measures and

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		<p>2.1.25.1 Surface Access Noise will be insulated against if it is found to be above SOAEL after construction. The Applicant does not specify how, or whether this will be dealt with by the relevant sub-committee.</p>	<p>Community First which sets out how this will be dealt with and notes (at paragraph 6.1.31) the role that the London Luton Airport Consultative Committee will have in the process.</p>
Michael Reddington	Noise	<p>2.1.26 Page 88: 16.9.11</p> <p>2.1.26.1 As commented previously (2.1.2.3 above) the reduction to 54dB LAeq applies for Daytime but there is no reduction for Night-time.</p> <p>2.1.26.2 Note this paragraph does not distinguish between Air and Ground noise but this is distinguished elsewhere.</p>	<p>It has not been necessary to define multiple night-time eligibility criterion as they would overlap and/or duplicate the daytime criterion. Properties exposed between the night-time Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) would be eligible for insulation under the daytime schemes. See for example paragraph 16.9.147 of Chapter 16 Noise and vibration of the Environmental Statement [REP1-003] which notes that 13,250 people between the night-time LOAEL and SOAEL in assessment Phase 1 would be eligible for noise insulation.</p> <p>It is not necessary to distinguish between air and ground noise in this paragraph, as properties exposed above the SOAEL for ground noise are also exposed above the SOAEL for air noise.</p>

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Michael Reddington	Noise	<p>2.1.27 Page 102: 16.9.81</p> <p>2.1.27.1 These comparisons are misleading. For instance, a change in aircraft fleet composition will happen anyway, as a result of the drive to Net Zero and general technological advances driven by manufacturers and operators profits which produce New and Next generation aircraft. Therefore, if the airport supports even the same number of ATMs as in 2019, there will be less noise - assuming the fleet composition will be the same for each (DM, DS) scenario.</p> <p>2.1.27.2 Page 108 16.9.97 As commented previously (2.1.2.3 above) the reduction to 54dB LAeq applies for Daytime but there is no reduction for Night-time.</p>	<p>The Applicant has undertaken an assessment of likely significant effects in Environmental Impact Assessment (EIA) terms by comparing the situation with the Proposed Development (the Do-Something scenario) to the situation without the Proposed Development (the Do-Minimum scenario) in each assessment year in Chapter 16 Noise and Vibration [REP1-003] of the Environmental Statement. The Do-Minimum scenario accounts for changes in aircraft fleet composition.</p> <p>For aircraft air and ground noise the assessment also compares the Do-Something scenario in each year to the 2019 Actuals baseline (or the 2019 Consented baseline in the sensitivity test). This comparison is to demonstrate how noise impacts will reduce over time, in line with the government policy objective to limit, and where possible reduce, the total adverse impacts on health and quality of life from aviation noise.</p> <p>See response to 2.1.26.1</p>
Michael Reddington	Noise / Flightpaths	<p>2.1.28 Page 123:16.9.143</p> <p>2.1.28.1 The proposed increase in ATMs is totally unacceptable. By Phase 2B:</p>	<p>The impact of noise (day and night) from the Proposed Development due to increased aircraft numbers has been assessed and all reasonably</p>

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		<p>Daytime increase = 62% and Night-time increase = 76% (and also allowing for the Night Quota limit of 9650 movements from 23:30 to 06:00.).</p> <p>2.1.28.2 The shoulder period 23:00-23:30 and 06:00-07:00 will be unimaginably busy.</p>	<p>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>
Michael Reddington	Fleetmix / Noise	<p>2.1.29 Page 128: 16.9.162 (also applies to 16.9.180 and 16.9.199)</p> <p>2.1.29.1 This optimistic forecast compares the DS case to 2019, but does not mention that comparing the DM case to 2019 provides better results, i.e. less people exposed to fewer ATMs. Also assumes new generation aircraft will be less noisy but as per the A321 Neo (see 2.1.22 above) this may not be the case.</p>	<p>Comparisons of the Do-Minimum case to the 2019 Actuals Baseline has been provided in Tables 16.26 and 16.27 of Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>The noise performance of new generation aircraft is based on measurement, not assumptions. The exception to this is for the A321neo in assessment Phases 2a and 2b (as set out above) and the Boeing 737Max which was not operating in sufficient numbers at the airport in 2019. See Section 6 of Appendix 16.1 of the Environmental Statement [AS-096].</p> <p>See also response earlier on assumptions relating to new generation aircraft being quieter.</p>
Michael Reddington	Surface Access / Noise	<p>2.1.30 Page 146: 16:9.229 states:</p> <p>2.1.30.1 "Many properties in the vicinity of Crawley Green Road, either side of Wigmore Lane, are expected to experience</p>	Noted.

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		<p>minor increases in surface access noise as a result of traffic increases on Crawley Green Road. Given these increases are likely to result in little change to the overall acoustic environment, significant adverse effects at these properties are unlikely, excepting where the absolute DS noise level is above the SOAEL. These properties (approximately 55) are located close to Crawley Green Road, between Vauxhall Way and Hedley Rise “</p>	
Michael Reddington	Surface Access / Noise	<p>2.1.30.2 I have the following concerns:</p> <ol style="list-style-type: none"> 1. The section of Wigmore Lane in front of ASDA will be made into a 4-lane section, with signallised junctions at either end. Other roundabouts will be similarly converted to signallised junctions. This will serve only to increase noise due to acceleration from lights as well as deceleration approaching them. 2. Furthermore, there will be an increase in traffic heading for the new Terminal 2 along the whole of Wigmore Lane, a two-lane carriageway (from Hitchin A505) and this is likely to cause congestion when one considers that there are three schools in its vicinity: Ramridge Primary, Wigmore 	<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 traffic growth, together with growth associated with background traffic and consented developments.</p> <p>Section 8 of the Transport Assessment 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. Highway improvements have been</p>

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		<p>Primary and Queen Elizabeth school. Not only will there be more noise there will be more pollution.</p> <p>3. The Applicant be asked to clarify if the modelling actually allows for the development of some 660 and 1400 properties that are planned around Mangrove and Cockernhoe (NHDC 16/02014/1 and 17/00830/1 respectively). The traffic to this development will use Crawley Green Road. Under the library document '21.2 Short List of Other development' it is noted that 16/02014/1 was not included in the Transport Assessment (although it is appreciated that this may not refer to this DCO it requires clarification).</p>	<p>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.</p> <p>Some people may choose to take alternative routes and the Applicant has 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>In the absence of the of the junction improvements, vehicles would still need to accelerate-decelerate on approach to the junction and as a function of congestion which would occur requiring vehicles to stop-start. It is therefore not considered that this would make a material difference to the assessment of road traffic noise presented in Chapter 16 Noise and vibration of the Environmental Statement [REP1-003].</p> <p>All planned and committed developments have been included within the transport modelling.</p> <p>The two sites listed were included within the DCO strategic traffic modelling in the LTP scenario, as they were both classified as</p>

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			<p>'Reasonably foreseeable'. The sites are referenced in the Strategic Modelling Forecasting Report as 'North Hertfordshire / East of Luton' and were combined into 2,100 dwellings (please refer to the DCO document Volume 7 Other Documents 7.02 Transport Assessment Appendices - Part 2 of 3 - Appendix F - Strategic Modelling Forecasting Report, Table 3.5: Forecast Residential Developments).</p> <p>For the 'Accounting for COVID-19 in transport modelling' work, which is currently in progress, in response to the ExA's Rule 9 Procedural Decision dated 13 June 2023, the Applicant will be upgrading these sites to become 'More Than Likely', and hence to include them in the Core growth scenario.</p>
Michael Reddington	Noise	<p>2.1.31 Page 152: 16.9.255 'Combined Effects' states:</p> <p>2.1.31.1 "The potential for combined noise effects due to exposure to multiple sources of noise has been considered qualitatively as there is no reliable means of quantitatively assessing the overall noise</p>	<p>No adverse likely significant effects have been identified for Eaton Green Road from aircraft air, ground or surface access noise. Therefore, no significant combined effects have been identified for these receptors as noted in paragraph 16.9.255 of Chapter 16 of the Environmental Statement [REP1-003].</p>

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		<p>effects resulting from combined exposure to multiple noise sources”.</p> <p>2.1.31.2 The Applicant does not consider that there are any significant combined effects from a combination of Air, Ground, Surface Access and Construction noise. This is clearly not true. Receptors along Eaton Green Road for example will be subject to Air, Ground and Construction noise as well as surface access noise, which will be cumulative.</p> <p>2.1.31.3 The Applicant makes similar comments in App 5.01 Chapter 21: “Incombination and Cumulative Effects”, just by way of example:</p> <p>“21.2.20 The changes in operational air noise associated with the Proposed Development has the potential to have a significant effect upon human (residential) receptors due to exceedances in the SOAEL (as defined in Chapter 16 of this ES [TR020001/APP/5.01]). This would impact upon those human (residential) receptors in close proximity to the Proposed Development and/or under the flight path. All other individual noise effects upon human (residential) receptors are considered negligible to minor adverse</p>	<p>Ground noise has not been ignored in Chapter 21 of the Environmental Statement [AS-032] and is discussed in Table 21.4 which sits above the quoted paragraphs.</p>

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		<p>and not significant. 21.2.21 Air noise impacts experienced by residents under the flight path (as identified in Chapter 16 of this ES [TR020001/APP/5.01]) would likely occur”</p> <p>2.1.31.4 It is notable in 21.2.20 that the Applicant completely ignores the effect of Ground Noise and only addresses Air Noise.</p>	
Michael Reddington	Planning	<p>2.1.32 Page 152: Table 16.74 19 mppa planning consent</p> <p>2.1.32.1 There is no sensitivity test for the situation where the 19mppa is not granted.</p>	The core case assumes that the 19 mppa planning permission has not been granted so a sensitivity test is not required.
Michael Reddington	Noise / GCG	<p>2.1.33 Page 152: Table 16.74 'Faster Growth Scenario'</p> <p>2.1.33.1 The Applicant has in the past gone for faster growth. If he achieves 23mppa in 2027 rather than the planned 21.5 mppa, this will just generate more noise and more emissions. The sensitivity tests are meaningless and go on to conclude that there are no significant effects relative to the 2019 scenario. The Applicant ignores one vital point - the level of insulation of eligible properties from 2014-2019 is extremely low so many people are already exposed to very high</p>	<p>The current insulation scheme is not part of the Proposed Development and concerns regarding the operation of current insulation schemes should be directed to the airport operator.</p> <p>How the assessment would be affected by the Faster Growth scenario, including the provision of noise insulation, is described in Table 16.74 of Chapter 16 of the Environmental Statement [REP1-003] and in more detail in Section 12 of Appendix 16.1 of the Environmental Statement [AS-096].</p>

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		<p>noise levels either because they have not responded to the insulation offer in time (and been 'locked out' for 5 years) or have just moved into the area.</p> <p>2.1.33.2 The Proposed development merely exposes them to even higher noise levels – although the Applicant generally describes the differences as 'insignificant'..</p> <p>2.1.33.3 It has to be assumed that Green Controlled Growth (GCG) strategy will deal effectively with this situation</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 based on the Faster Growth scenario.</p>
Michael Reddington	Fleetmix / Noise	<p>2.1.34 Page 154: Table 16.74 'Next Generation Aircraft are quieter in future years'. (See also Paragraph 16.10.10)</p> <p>2.1.34.1 The Jet Zero strategy has been criticised as largely aspirational.</p> <p>2.1.34.2 The sensitivity test used by the Applicant is biased in his favour, i.e. less noisy Next gen. aircraft. However there is no sensitivity test for Next Generation aircraft being noisier, particularly electric aircraft on arrival due to no weight reduction during the journey, and hydrogen aircraft in general due to a larger airframe.</p>	<p>Information from the International Civil Aviation Organization suggests that next-generation aircraft will continue to show reduction in noise (Ref 14), see Section 12.6 of Appendix 16.1 of the Environmental Statement [AS-096] for further information.</p> <p>However, as a reasonable worst case the noise assessment in Chapter 16 of the Environmental Statement [REP1-003] assumes that next-generation aircraft will be no quieter than the new-generation aircraft that they replace.</p>

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			<p>The Noise Envelope Limits in the Green Controlled Growth Framework [APP-218] have therefore been set on the same assumption that next-generation aircraft are no quieter than new-generation aircraft. In the instance that next-generation aircraft are noisier (which is not expected to be the case) then other mitigations would need to be employed to offset this increase and stay within the Noise Envelope Limits.</p> <p>It is therefore not considered necessary to undertake such a sensitivity test.</p>
Michael Reddington	Noise / Compensation	<p>2.1.35 Page 159: 16.10.5 'Air noise insulation' states: "As part of the Proposed Development, the current air noise insulation scheme administered by LLAOL will be updated if development consent is granted. The updated noise insulation scheme improves on the current scheme and goes beyond the government proposals set out in Aviation 2050. The proposed residential noise insulation scheme sets a five-tiered scheme as follows:..... 2.1.35.1 It has ot be emphasised that the current insulation scheme is not limited to</p>	<p>The proposed air noise insulation scheme goes above and beyond policy expectations and has been enhanced to avoid significant adverse effects from the Proposed Development. The small number of properties exposed above the ground noise SOAEL with the Proposed Development are also exposed above the air noise SOAEL and would therefore be eligible for a full package of noise insulation. As a result, there are no significant effects identified for ground noise in Chapter 16 Noise and Vibration of the Environmental Statement [AS-080] and it is not considered necessary to</p>

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		Air Noise but includes Ground Noise as well. 2.1.35.2 Noise Insulation issues are further discussed under 'Chapter 7.10 Compensation'	define a separate ground noise insulation scheme.
Michael Reddington	Noise / Compensation	2.1.36 Page 160: 16.10.9 2.1.36.1 The Applicant provides no numerical data to determine the performance expected of the insulation.	It is not possible to define numerical data on the performance expected as it would depend on the specifics of each property, its insulation performance prior to insulation and the insulation package that has been offered and accepted.
Michael Reddington	Noise / Compensation	2.1.37 Page 162: 16.11.4 2.1.37.1 If past performance is anything to go by (see later Sections), these 'temporary adverse effects' due to lack of insulation are likely to be long term. This applies to all Phases.	The current insulation scheme is not part of the Proposed Development and concerns regarding the past performance of the current insulation scheme should be directed to the airport operator.
Michael Reddington	Noise	2.1.38 Page 163: 16.11.9 Ground Noise (All phases) 2.1.38.1 This paragraph talks about Air Noise, not Ground Noise (which has yet to be measured as opposed to modelled).	As noted in paragraph 16.6.18 of Chapter 16 of the Environmental Statement [REP1-003] , ground noise modelling is limited to predictions, and it has not been possible to validate the predictions to the same extent as air noise due to the dominance of air noise and the inability to distinguish between ground noise and air noise from noise monitoring terminal data.

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Michael Reddington	Noise / Compensation	<p>3.1.1 [See Page 196: Table 7.41: Daytime 2019 Actuals Baseline v DS 2027 Air Noise Analysis – Households]</p> <p>3.1.2 [See Page 197: Table 7.44: Night-time 2019 Actuals Baseline v DS 2027 Air Noise Analysis – Households]</p> <p>But: from the 2023 Insulation Eligibility Document for Residential Dwellings (based on 2019 actuals) we get: [Please see table in submission]</p> <p>3.1.2.1 The Applicant does not explain the apparent anomalies between these figures.</p>	<p>The differences are because the airport operator's 2023 insulation eligibility is based on forecast 2023 movements (not 2019 actuals) and the airport operator's 2023 insulation eligibility has been calculated using a different noise model (see paragraph 16.5.43 of Chapter 16 of the Environmental Statement [REP1-003]). The numbers cannot therefore be directly compared.</p>
Michael Reddington	Noise	<p>3.1.3 Page 204: Paragraph 8.1.1</p> <p>3.1.3.1 This states that 'improved aircraft taxi routes will reduce time spent by aircraft travelling between aircraft stands and the runway'. Surely this only applies when the wind direction favours the shortest route; if the prevailing wind determines that the aircraft take off from the farthest end of the runway there is no saving.</p> <p>3.1.3.2 If Air Noise and Ground Noise are to be treated equally (as per paragraph 8.1.2: "...the LOAEL and SOAEL for air noise presented in Table 7.2 are considered applicable to ground noise")</p>	<p>As noted in paragraph 8.1.1 of Appendix 16.2 of the Environmental Statement [AS-096] improved aircraft taxi routes will reduce time spent by aircraft travelling between aircraft stands and the runway. This improvement will provide time savings under both operational modes (i.e. regardless of wind direction).</p> <p>The proposed air noise insulation scheme goes above and beyond policy expectations and has been enhanced to avoid significant adverse effects from the Proposed Development. The small number of properties exposed above the ground noise SOAEL with the Proposed</p>

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		then it must be assumed that insulation against Ground noise is treated equally as for Air noise.	Development are also exposed above the air noise SOAEL and would therefore be eligible for a full package of noise insulation. As a result, there are no significant effects identified for ground noise in Chapter 16 Noise and Vibration of the Environmental Statement [AS-080] and it is not considered necessary to define a separate ground noise insulation scheme.
Michael Reddington	Noise	<p>3.1.4 Page 204: Paragraph 8.2.2</p> <p>3.1.4.1 This sets out the sources of ground noise but does not include the noise of fuel bowsers which must travel between the (relocated) fuel storage depot and the stands.</p>	The noise of fuel bowsers is not considered significant in the context of airport operations.
Michael Reddington	Noise / Compensation	<p>3.1.5 Page 209: Table 8.3</p> <p>3.1.5.1 This sets out Ground Noise predictions for 2027. Daytime Ground noise ranges from 52.1 LAeq 16h at GR21 (Eaton Place Area) to 62,5 dB LAeq 16h at GR4 (Dane Street).</p> <p>3.1.5.2 Night-time Ground noise ranges from 47.31 LAeq 8h at GR21 (Eaton Place Area) to 58.7 dB LAeq 8h at GR4 (Dane Street).</p> <p>3.1.5.3 Therefore many of these locations would qualify for insulation on Ground</p>	The proposed air noise insulation scheme goes above and beyond policy expectations and has been enhanced to avoid significant adverse effects from the Proposed Development. The small number of properties exposed above the ground noise SOAEL with the Proposed Development are also exposed above the air noise SOAEL and would therefore be eligible for a full package of noise insulation. As a result, there are no significant effects identified for ground noise in Chapter 16 Noise and Vibration of the Environmental Statement

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		Noise alone assuming eligibility as for Air Noise, particularly 54dB LAeq 16h (daytime).	[AS-080] and it is not considered necessary to define a separate ground noise insulation scheme.
Michael Reddington	Noise / Planning	<p>4.1.1 Section 4: Noise Insulation</p> <p>4.1.1.1 This contains only two sub-sections (i) paragraph 4.1 Air Noise (ii) paragraph 4.2 Surface Access Noise</p> <p>4.1.1.2 Section 4 does not mention Ground Noise Insulation AT ALL.</p> <p>4.1.1.3 This is contrary to Paragraph 3.2.2 of Chapter 16.1 which refers to Luton Local Plan Policy LLP6: “ c. achieve further noise reduction or no material increase in day or night time noise or otherwise cause excessive noise including ground noise at any time of the day or night and in accordance with the airport's most recent Airport Noise Action Plan; 4.1.1.4 This section fails to meet the requirements of the Luton Local Plan.</p>	<p>It is not agreed that not including ground noise eligibility criteria is contrary to the Luton Local Plan (Ref 9). The Luton Local Plan does not specify that noise insulation must be provided. The Proposed Development contains embedded mitigation for the control of ground noise (see Section 16.8 of Chapter 16 of the Environmental Statement [REP1-003]) in line with the Luton Local Plan.</p> <p>The proposed air noise insulation scheme goes above and beyond policy expectations and has been enhanced to avoid significant adverse effects from the Proposed Development. The small number of properties exposed above the ground noise SOAEL with the Proposed Development are also exposed above the air noise SOAEL and would therefore be eligible for a full package of noise insulation. As a result, there are no significant effects identified for ground noise in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003] and it is not considered necessary</p>

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			to define a separate ground noise insulation scheme.
Michael Reddington	Noise / Compensation	<p>5.1.1 Page 2: 1.1.7 states “This document sets out discretionary Compensation Policies and Measures that will be an enhancement upon the statutory position and would be secured in a s106 agreement entered into by the Applicant similarly to how the existing noise insulation scheme is secured. In accordance with section 106 of the Town and Country Planning Act 1990, planning obligations secured in such an agreement are enforceable against the Applicant as the entity entering into such an agreement.....”</p> <p>5.1.1.1 The Applicant does not identify all the parties to the Section 106 Agreement and who will carry out Governance and oversight.</p> <p>5.1.1.2 Currently LLAOL, not the Applicant, provides insulation to their own timescale.</p>	<p>The current insulation scheme is not part of the Proposed Development and concerns regarding the timescales of current insulation schemes should be directed to the airport operator.</p> <p>The parties to the Section 106 agreement are identified in section 5.8.5 of the Planning Statement [AS-122]. As noted at section 5.8.9 of the Planning Statement, the obligation to carry out the compensation policy will be on the airport operator. The terms of the Section 106 agreement will be developed further and agreed with all parties through the course of the Examination.</p>
Michael Reddington	Noise / Compensation	<p>5.1.2 Page 16: 6</p> <p>5.1.2.1 The Applicant's Insulation Scheme for Residential Properties is as follows: [See Insulation Scheme table in submission]</p>	In line with Government noise policy (Ref 10), eligibility for the noise insulation schemes is determined based on L _{Aeq} noise exposure. UK specific research from the Civil Aviation Authority (Ref 11, Ref 12) shows that there is no

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		<p>5.1.2.2 The “improved” noise insulation scheme is complex and over-reliant on dB LAeq T noise contours only.</p> <p>5.1.2.3 The ExA will wish to test whether it is feasible to make a sensible judgement on eligibility for Scheme 3 (for example) in Table 1.1 of AS-128 when the criteria (“Residential property inside the night-time 55dB LAeq,8h contours and outside the daytime 60dB LAeq,16h contour”) indicate for the most part a vanishingly small area between the blue and orange/blue outlines on the contour maps in AS-126, thinner than the lines themselves.</p> <p>5.1.2.4 Caddington is of particular concern: flight arrivals pass directly over residential areas of the village at low altitude and peak noise levels are equivalent to those in Breachwood Green yet, based on noise contours alone, most of Caddington is ineligible for noise insulation and the fraction which is can only claim under Scheme 5, inside the blue/green and outside the mauve lines on the maps in AS-126: the least effective insulation option</p>	<p>evidence to suggest that any noise indicators correlate better with the principal health effects from aircraft noise (daytime annoyance and night-time sleep disturbance) than the LAeq metric.</p> <p>The Draft Compensation Policies, Measures and Community First has been updated to include further information on the proactive approach that will be adopted by the Applicant to ensure both knowledge and availability of the offer has been clearly and openly communicated. This will include an online compensation look-up tool post consent that will allow residents to find out which noise insulation scheme they may be eligible for, avoiding the need to interpret contour maps.</p> <p>Eligibility for the noise insulation scheme is determined by noise exposure contours, so areas that are outside the areas of eligibility are not eligible for insulation as they are exposed to lower noise levels. See Draft Compensation Policies Measures and Community First] for more information on the noise insulation eligibility criteria.</p>

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Michael Reddington	Noise / Fleetmix	<p>5.1.2.5 Arrivals noise is known to reduce comparatively little if at all for a modernised aircraft compared to one which is unmodernised and of the same size, because on arrival most noise is generated by the airframe.</p> <p>5.1.2.6 If the fleet becomes modernised towards larger aircraft, then logically the arrivals noise can only progressively worsen.</p>	The variation between arrivals and departure noise is taken into account in the noise assessment in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003] .
Michael Reddington	Noise / Compensation	<p>5.1.2.7 The extracts from AS-126 below show the evolution of the contours over Caddington as numbers of flights increase: by Phase 2b there would be 70% additional night flights per annum, but the increasing contours barely include any additional homes and do not reflect the additional health harms. Basing noise insulation on the N-above contours or on peak noise values measured in homes may be more appropriate in this case. [See maps in submission]</p> <p>5.1.2.8 AS128 does not distinguish between Air Noise and Ground Noise whereas AS080, paragraph 16.9.253 states that only Air noise will be insulated</p>	<p>In line with Government noise policy (Ref 10), eligibility for the noise insulation schemes is determined based on L_{Aeq} noise exposure. UK specific research from the Civil Aviation Authority (Ref 11, Ref 12) shows that there is no evidence to suggest that any noise indicators correlate better with the principal health effects from aircraft noise (daytime annoyance and night-time sleep disturbance) than the L_{Aeq} metric.</p> <p>It is not agreed that not including ground noise eligibility criteria is contrary to the Luton Local Plan (Ref 9). The proposed air noise insulation scheme goes above and beyond policy expectations and has been enhanced to avoid</p>

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		<p>against, apart from a few properties in Dane Street and Someries Castle which will be insulated against Ground noise.</p> <p>5.1.2.9 As commented previously, the insulation policy needs to incorporate all noise sources, not just Air.</p> <p>5.1.2.10 It is assumed therefore, that Ground Noise, Air Noise, Surface Access and Construction noise all fall under this insulation purview although the ExA may request the Applicant to confirm.</p> <p>5.1.2.11 Although Air Noise and Ground Noise LOAELs etc. are the same, they are different to Surface Access and Construction Noise LOAELS etc. Thus, Table 1.1 and the text of this document (and related documents) should be updated to reflect.</p>	<p>significant adverse effects from the Proposed Development. The small number of properties exposed above the ground noise SOAEL with the Proposed Development are also exposed above the air noise SOAEL and would therefore be eligible for a full package of noise insulation. As a result, there are no significant effects identified for ground noise in Chapter 16 Noise and Vibration of the Environmental Statement [AS-080] and it is not considered necessary to define a separate ground noise insulation scheme.</p> <p>In contrast, adverse likely significant effects have been identified for surface access noise, so a surface access noise insulation scheme has been introduced, see paragraphs 6.1.28 onwards of Draft Compensation Policies Measures and Community First .</p>
Michael Reddington	Noise / Compensation	<p>5.1.3 Page 16: 6.1.1</p> <p>5.1.3.1 Noise insulation is only a form of compensation, not comprehensive aircraft noise mitigation. Noise insulation is ineffective if people open their windows at night in summer, or use a balcony, or are</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 . The hierarchy therefore starts with mitigation at source and</p>

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		<p>in the garden, or wish to peaceably enjoy a park or outdoor public space affected by overflights.</p>	<p>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 (see Draft Compensation Policies Measures and Community First [TR020001/APP/7.10])</p>
<p>Michael Reddington</p>	<p>Noise / Compensation</p>	<p>5.1.4 Page 16: 6.1.2 5.1.4.1 The Applicant needs to appreciate that not only permanent structures but parked mobile home sites such as those in Half Moon Lane in Pepperstock are directly overflowed and badly affected by aircraft noise so will also need the additional insulation where eligible.</p>	<p>There is no exclusion in the proposed compensation policy for park homes. All properties within the qualifying contour wishing to be considered under the noise compensation schemes would be surveyed to see what insulation would be effective. Park homes are equally as eligible for the insulation schemes as other forms of residential property provided that they meet the eligibility criteria outlined in Draft Compensation Policies Measures and Community First [TR020001/APP/7.10]</p> <p>It is likely that the properties referred to would also be eligible to claim compensation for diminution in value caused by noise from the proposed development. This can be claimed under Part 1 Land Compensation Act 1973 (Ref 8).</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
Michael Reddington	Noise / Compensation	<p>5.1.5 Page 16: 6.1.4</p> <p>5.1.5.1 The insulation eligibility criteria are all based on dB LAeq which is an average. It does not take into account peak noise which affects residents. See also 5.1.2.2 above.</p> <p>5.1.5.2 The current scheme provides insulation where a property is subject to greater than 90dB SEL at least once per night thereby reflecting better the impact of short duration high intensity noise.</p> <p>5.1.5.3 The Applicant does not state whether properties previously insulated to a 'lower' standard then now being proposed (under the less financially generous Project Curium arrangements and/or by residents having paid for noise insulation themselves) would be eligible for upgraded insulation due to the significantly increased noise footprint of the proposed expansion. Nor does the Applicant state whether properties that failed to respond to the original Project Curium insulation letter and are 'locked out' for five years, will also be approached</p>	<p>In line with Government noise policy (Ref 10), eligibility for the noise insulation schemes is determined based on LAeq noise exposure. UK specific research from the Civil Aviation Authority (Ref 11, Ref 12) shows that there is no evidence to suggest that any noise indicators correlate better with the principal health effects from aircraft noise (daytime annoyance and night-time sleep disturbance) than the LAeq metric.</p> <p>Properties that have already had insulation installed will be eligible under the new scheme. In any subsequent offer for noise insulation, the Applicant reserves the right to reflect any previous noise insulation compensation payment already made. This is set out in paragraph 6.1.23 of Draft Compensation Policies Measures and Community First [TR020001/APP/7.10]</p> <p>The current insulation scheme is not part of the Proposed Development and concerns regarding the standard and process of current insulation schemes should be directed to the airport operator.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
Michael Reddington	Noise / Compensation	<p>5.1.6 Page 17: 6.1.10</p> <p>5.1.6.1 This insulation proposal does not make sense (refer to 5.1.5 above). Under this system, a property that is exposed to 54dB LAeq 8h gets no compensation at all even though it is only 1dB below SOAEL, whereas a property exposed to 54dB LAeq 16h and is 9dB below SOAEL gets £4,000. This is not equitable when receptors are more sensitive to night noise and all measures of LOAEL, SOAEL and UAEL reflect.</p>	<p>It is not the case that properties exposed to 54dBL_{Aeq,8h} would not be eligible. The 54dBL_{Aeq,8h} generally sits within the 57dBL_{Aeq,16h} so properties exposed to this level of night-time noise would be eligible for insulation under scheme 4 with a contribution of up to £6,000. This is demonstrated, for example, in paragraph 16.9.147 of Chapter 16 Noise and vibration of the Environmental Statement [REP1-003] which notes that 3,250 people between the night-time LOAEL and SOAEL in assessment Phase 1 would be eligible for noise insulation.</p>
Michael Reddington	Noise / Compensation	<p>5.1.7 Page 18: 6.1.13</p> <p>5.1.7.1 The existing insulation scheme excludes properties built after 2014, the year the Applicant was permitted to increase throughput from to 18mppa by 2028. The policy was not clear as to whether properties in the process of being built, or who had Planning Permission agreed but not started, are also excluded.</p> <p>5.1.7.2 The Applicant should specify if there are any similar restrictions in his insulation policy.</p>	<p>The Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] has been updated to clarify that the cut-off date for eligibility for noise insulation is properties built before October 2019, the date of the first Statutory Consultation.</p>
Michael Reddington	Noise / Compensation	<p>5.1.8 Page 18: 6.1.13</p> <p>5.1.8.1 As part of the Planning Conditions for Project Curium to increase throughput</p>	<p>The current insulation scheme is not part of the Proposed Development. The Section 106 agreement associated with the current planning</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		<p>from 9mppa to 18mppa the Applicant was required to introduce a noise insulation scheme. No programme was circulated</p> <p>5.1.8.2 A throughput of 18mppa together with the significant increase in noise, was achieved in 2019, well ahead of the planned date of 2028. However the Applicant by 2019 had only approached 268 of the 2,300-odd residential properties eligible for some form of insulation and none of the 14 nonresidential properties eligible for insulation. This was pre-Covid so the pandemic could not be blamed as a reason for delay.</p>	<p>permission sets the annual budget of £100,000 for the noise insulation scheme and this budget has been used to determine the number of properties that can be insulated annually. This budget has been spent each year (and exceeded in 2022 and 2023).</p> <p>The Draft Compensation Policies Measures and Community First [TR020001/APP/7.10] document contains a commitment, in paragraph 6.1.14 to prioritise the most affected properties within the latest 63dBLAeq,16h and 55dBLAeq,8h contours and introduce each scheme as efforts to insulate those in worst affected contours are complete.</p> <p>The Draft Compensation Policies, Measures and Community First [TR02001/APP/7.10] has been updated to include further information on the proactive approach that will be adopted by the Applicant to ensure both knowledge and availability of the offer has been clearly and openly communicated.</p>
Michael Reddington	Noise / Compensation	<p>5.1.9 Page 18:6.1.15</p> <p>5.1.9.1 This assumes a process of noise measurement. However, Noise monitoring carried out by LLAOL does not include</p>	<p>The aircraft air noise model has been extensively validated using radar track data and noise measurements, exceeding the requirements for noise model validation set by</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		noise monitoring in the areas not directly underneath the flight path, so ignores particularly those defined by the Ground noise contour maps. See for example "2023 Noise Monitoring Schedule" version 1.0. (Ref. 1) Without monitoring of the actual noise experienced by receptors, and its composition, it is difficult to see how the Applicant can confidently produce noise contour maps.	the Civil Aviation Authority (Ref 3.19). See Section 6 of Appendix 16.1 of the Environmental Statement [AS-096] for full details of the aircraft noise validation.
Michael Reddington	Noise / Compensation	<p>5.1.10 Page 18: 6.1.16</p> <p>5.1.10.1 There is no commitment to a programme so the Applicant cannot be held to account. This needs to be driven by timescales otherwise residents may be subject to high levels of noise for an extended period. This becomes a Health and Safety issue.</p> <p>5.1.10.2 What is not clear in the DCO is who has Duty of Care - Luton Borough Council, the Applicant or LLAOL, under the Section 106 Agreement.</p>	<p>The Applicant is making a commitment to prioritise areas for noise insulation based on those most significantly impacted. Whilst roll-out will be proactively managed by the airport operator a programme has not been specified because the take up rate and speed of take up cannot be regulated by the Applicant (see Draft Compensation Policies Measures and Community First [TR020001/APP/7.10])</p> <p>It is not clear what "Duty of Care" is being referred to here and in what context. However, the application for development consent is promoted by the Applicant who is responsible for the commitments made (unless expressly stated otherwise)</p>
Michael Reddington	Noise / Compensation	5.1.11 Page 18: 6.1.17	The current insulation scheme is not part of the Proposed Development and concerns regarding

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		<p>5.1.11.1 The Applicant needs to be more specific. To date a first-class stamped envelope has been posted to eligible properties. The enclosed letter does not explain the health issues which insulation is designed to ameliorate and the letter is addressed to the 'occupier'. It is no wonder that few respond especially if they are tenants and not owner-occupiers.</p> <p>5.1.11.2 Historically here has been a low take up of insulation but no investigation by the Applicant as to the causes and how this could be improved. The Applicant does not set out in detail what the procedure will be in future, for example: (a) whether owners will be traced through the Land Registry, or (b) whether registered post will be used instead of a first class stamp.</p>	<p>the current insulation schemes should be directed to the airport operator.</p> <p>The Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] has been updated to include further information on the proactive approach that will be adopted by the Applicant to ensure both knowledge and availability of the offer has been clearly and openly communicated. The document sets out an indicative process to establish how the schemes will be rolled out effectively.</p>
Michael Reddington	Noise / Compensation	<p>5.1.12 Page 18: 6.1.17</p> <p>5.1.12.1 Currently the addressee has only 30 days (give or take) in which to respond to the insulation offer letter. If they fail to do so they are approached again only after 5 years. The Applicant needs to specify what if any limitations are being proposed in the DCO.</p>	<p>The Applicant has now submitted amendments to the proposed policy to help clarify the offer process. The intention is for the Applicant to take a proactive approach. Reference to 5 years in the policy relates to updating noise contour plans, not the time between potential approaches to homeowners who do not respond to an initial offer. Roll out and selection of addresses to be made the offer will be agreed through the proposed engagement with LLACC.</p>

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			The Roll Out Plan will prioritise those who would be most affected by the Proposed Development.
Michael Reddington	Planning / Compensation	<p>5.1.13 Page 18: 6.1.17 A</p> <p>5.1.13.1 A pre-procured Contractor will not be able to carry out works to a Listed building without consent, granted to the owner. Therefore there should be a separate Scheme set up which accommodates these instances and potentially where the Applicant pays the owner to employ a specialist contractor once Listed Building consent has been granted.</p>	Noted. The Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] has been updated to note that the Applicant will provide support to owners of Listed Buildings to help cover the costs of securing the necessary consents. In circumstances where the installation of approved insulation to a listed building is required those with contracts to deliver the insulation will be expected to complete the work. Where this may not be possible the Applicant will consider the options with the homeowner but gives no commitment to increase the level of grant due for the property under the policy.
Michael Reddington	Noise / Compensation	<p>5.1.14 Page 18: 6.1.18</p> <p>5.1.14.1 It is assumed this will be included in the letter to the owner.</p>	Noted, although the detailed content of letters is not yet fixed.
Michael Reddington	Noise / Compensation	<p>5.1.15 Page 19: 6.1.21</p> <p>5.1.15.1 See separate comments below in relation to CAP 1616A.</p>	Noted, please refer to responses below.
Michael Reddington	Noise / Compensation	<p>5.1.16 Page 19: 6.1.21</p> <p>5.1.16.1 There is no specification of the measurements that should be taken prior to and post installation, nor the expected</p>	The Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] has been updated to note that a proportionate testing regime will be developed to monitor and

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		noise levels within properties after treatment. This does not follow any scientific method and does not call up a traceable specification such as BS8233 (Ref.3), or WHO recommendations.	as necessary improve the quality control of the scheme going forward. The testing regime will be developed in consultation with the London Luton Airport Consultative Committee and having regard to best practice.
Michael Reddington	Noise / Compensation	<p>5.1.17 Page 19: 6.1.22</p> <p>5.1.17.1 There is little point in appointing a chairman of a committee that has no executive powers to require LLAOL to act in a timely manner.</p>	The aim of the Committee is to ensure that as wide a range of views as possible is made available to the London Luton Airport management team so that they can take account of the issues which are of concern to those using the airport, working at it or living around it. Timeliness being just one of such issues that could be raised.
Michael Reddington	Noise	<p>5.1.18 Page 20: 6.1.28</p> <p>5.1.18.1 The comments applied above to aircraft noise equally apply here.</p>	Noted. The responses provided above are also applicable.
Michael Reddington	Noise	<p>6.1.1 Noise figures presented by government and associated publications discuss levels of noise typically in terms of 'dB LAeq 16h'. These are figures either generated from models such as AEDT or from long-term measurements made by specialised microphones.</p> <p>6.1.2 However they share one shortcoming – they are EXTERNAL measurements and do not reflect the level of noise experienced within a property.</p>	The LAeq metric is used as the primary assessment metric in line with aviation noise policy (Ref 13) and guidance from the Civil Aviation Authority which states that "evidence based decisions should continue to use LAeq,16h" for daytime (Ref 11) and "there is insufficient evidence to change from the current practice of using average summer night LAeq,8h noise exposure for UK assessments" for night-time (Ref 17).

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		<p>6.1.3 The Government initiated the Independent Commission on Civil Aviation Noise (ICCAN) to provide best practice, in the mitigation of aircraft noise in properties. ICCAN produced a number of recommendations in their document "ICCAN review of airport noise insulation schemes March 2021" (Ref 7): [See Table 6.1: ICCAN Recommendations]</p>	<p>Notwithstanding this, supplementary noise metrics including N-above metrics have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>The ICCAN recommendations are noted and will be considered in the operation of the noise insulation scheme. However, it should be noted that they have not been adopted in aviation noise policy. 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, and all properties exposed above the daytime and night-time Significant Observed Adverse Effect Level (SOAEL) will be eligible for a full package of noise insulation (i.e. the resident will not need to fund any of the insulation works). See Draft Compensation Policies Measures and Community First [TR020001/APP/7.10] for further details.</p> <p>The proposed insulation scheme has been agreed as appropriate with the host authorities</p>

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			in the draft Statements of Common Ground [TR020001/APP/8.13-8.17] .
Michael Reddington	Noise / Compensation	<p>6.2.1 The current insulation Scheme run by the Applicant in conjunction with LLAOL is supposed to carry out tests before and after insulation, as well as carry out post-installation satisfaction surveys, in accordance with the current Airport Noise Action Plan 2019-2023 (Ref. 2). Note that this plan pre-dates ICCAN's 2021 recommendations.</p> <p>6.2.2 I understand that this has not happened even though the insulation scheme has been running for some years.</p> <p>6.2.3 Therefore there is no record of insulation efficacy, nor a record of actual internal noise levels at any property to confirm that they are now at NOEL (No Observable Adverse Effect) or below, for example.</p> <p>6.2.4 Table 6.2 below sets out the current testing regime specified on page 2 of LLAOL document "SEL definition" (Ref. 4) and which should have been followed by the Applicant. The table below also includes my comments on the tests.</p>	<p>The current insulation scheme is not part of the Proposed Development and concerns regarding the current insulation schemes should be directed to the airport operator. That said the airport operator has confirmed that whilst there is no obligation to test following installation of insulation provided under the current policy sample testing has been carried out.</p> <p>For the Proposed Development, the Draft Compensation Policies, Measures and Community First [D2 ref tbc] has been updated to note that a proportionate testing regime will be developed to monitor and as necessary improve the quality control of the scheme going forward. The testing regime will be developed in consultation with the London Luton Airport Consultative Committee and having regard to best practice.</p>

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Michael Reddington	Noise	<p>Table 6.2: Current Testing Regime with comments</p> <p>1. Test Arrangements Acoustic tests are arranged on a sample of residential properties to measure the building both before and after the sound insulation works are carried out.</p> <p>Comment</p> <ol style="list-style-type: none"> 1. These tests do not reference a traceable standard such as BS8233 2. Sample size is not determined No respondents have yet reported testing being carried out either before or after installation. 3. Accuracy of the test equipment to be specified <p>2. Aircraft noise measurements Measurements are made in accordance with an International Standard (BS EN ISO 16283-3). This includes simultaneous measurements of aircraft events both outside the house and inside the house. Measurements are made of individual aircraft events. These last around 20-30 seconds. We typically measure around 10 events per room. However, we look for at</p>	See response directly above

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		<p>least 5 measurements of the more typical Easyjet/Wizz flights.</p> <p>Comment</p> <ol style="list-style-type: none"> 1.Height above ground of the external measuring equipment not stated, e.g. 1.5m for living room and 4m for bedroom. 2. External monitor location not specified e.g. which façade. 3. Free-field or facade measurement to be defined <p>3. Reverberation/echo measurements</p> <p>Aircraft sound levels inside habitable rooms will vary depending on how much reverberation/echo there is in a room. Aircraft noise levels will sound much lower in a living room with thick carpets, lots of soft furnishings, curtains etc. Aircraft noise will sound higher in a room with hard floor finish, blinds rather than curtains and little furniture. We therefore measure the amount of reverberation in the room and correct the results to the acoustic conditions of a standard habitable room. This enables a like for like comparison.</p> <p>Comment</p> <ol style="list-style-type: none"> 1. Needs to specify acceptable levels of internal noise per room. 	

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		<p>2. Need to clarify if there is reverberation caused by the amplitude and frequency spectrum of aircraft noise particularly on take-off and particularly on those premises directly under the flight path. (Note: BS8233 defines reverberation as: "time that would be required for the sound pressure level to decrease by 60 dB after the sound source has stopped")</p> <p>3. Since each room is different, in respect of its response, any sample testing needs to be carefully thought through</p> <p>4. Background measurements</p> <p>We also must measure and correct for background noise. We need quiet conditions inside homes to measure aircraft noise accurately and residents are helpful at being quiet for our tests. Nevertheless, there will be continuous background sound which interferes with the measurements. This can be from external sources (A1081 and distant M1 noise) or this can be from internal sources (fridge hum). We measure this background noise and correct our results to minimize this effect.</p> <p>Comment</p>	

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		<p>Background noise measurement locations to be stated including internal and external.</p> <p>5. Calculations</p> <p>We calculate the level difference between inside and outside (after correcting for echo/background). This provides a level difference in decibels. Typically, we would expect a performance of around 35 dB for a property treated under the scheme. We present the results of the test using a $D_{at,E,2m,nTw}$ metric. This provides an indication of the difference between inside and out. Therefore, if someone is exposed to 63 dB LAeq,16h of noise outside then you would expect an internal noise level of $63 - 35 = 28$ dB inside. This is somewhat of an over-simplification but hopefully provides some context as to the results.</p> <p>Comment</p> <p>Level difference (Attenuation) should be measured and recorded with windows and/or ventilators open and/or closed. Also if windows and ventilators closed should check internal room temperature and humidity to ensure comfortable conditions in worst case.</p> <p>6. Review</p>	

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		<p>The results of the testing provide us with evidence as to whether the installation has “worked”. If the result is poor this may indicate that the windows are not well sealed and/or there is an issue with noise coming into the room from a different path (roof for example). We also carry out visual inspections of the installed windows and vents to see if these have been installed well.</p> <p>Comment Assumes that remedial works will be carried out should any parameters fail the tests and visual inspections. Assume condensation is checked.</p> <p>Assumption 1 Ground noise measured in the same way</p> <p>Assumption 2 Traffic noise is not measured at all.</p>	
Michael Reddington	Noise	<p>6.3.1 Section 4.1 and 4.2 of the NAP 2019-2-23 is reproduced below. [Please see table in submission]</p> <p>6.3.1.1 Note 1: The Ground Noise limits stated under ‘Numbers Affected’ differ from the limits specified in the 2023 Eligibility</p>	<p>The current insulation scheme and Noise Action Plan is not part of the Proposed Development and concerns regarding the current insulation schemes or the Noise Action Plan should be directed to the airport operator.</p>

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		<p>document, i.e. 63dB Lday (above) is reduced to 55dB and 55dB Lnight (above) is reduced to 45dB.</p> <p>6.3.1.2 Note 2: A draft Noise Action Plan 2024-2028 was circulated for comment and with the exception of the date includes the same text as above.</p>	
Michael Reddington	Noise	<p>6.4.1 ICCAN is now disbanded and its function falls within the scope of CAP1616A, Therefore many of its recommendations have been superseded by events. Those which are superseded have been 'greyed out' in Table 6.1.</p>	<p>ICCAN has been disbanded and that some of its functions have been taken over by the Civil Aviation Authority since April 2022. CAP1616A is a specific technical annex published by the Civil Aviation Authority and relates to the environmental assessment of airspace change. It is not related to ICCAN's role.</p>
Michael Reddington	Noise	<p>6.4.2 It is very debatable as to whether and how CAP 1616A is an appropriate forum for insulation testing as CAP 1616A deals with airspace changes.</p>	<p>Please refer to the response immediately above.</p>
Michael Reddington	Noise	<p>6.4.3 CAP 1616A has not yet been updated to incorporate the ICCAN recommendations or test methodologies nor set pass/fail limits. It was expected that the Applicant would produce an insulation test programme as part of the DCO to back up the Compensation event of insulation provision.</p>	<p>The Draft Compensation Policies, Measures and Community First has been updated to note that a proportionate testing regime will be developed to monitor and as necessary improve the quality control of the scheme going forward. The testing regime will be developed in consultation with the London Luton Airport Consultative Committee and having regard to best practice.</p>

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		<p>6.4.3.1 No such test programme has been forthcoming so the Applicant does not have a strategy to determine (a) what is being insulated and (b) whether the insulation is effective.</p> <p>6.4.3.2 Therefore there is no record of insulation efficacy, nor a record of actual internal noise levels to confirm that they are now at NOEL (No Observable Adverse Effect) or below.</p> <p>6.4.3.3 It is my concern that this situation will not improve should the Applicant be successful in his DCO submission so I suggest that a testing methodology such as the one set out below is adopted and implemented forthwith.</p>	
Michael Reddington	Noise / Health and Community	<p>6.5.1 The World Health Organisation has produced a document "Night Noise Guidelines for Europe, 2009 (ISBN 978 92 890 4173 7) and describes in some detail the serious health impacts of noise exposure at night.</p> <p>6.5.2 It also sets out what are acceptable limits of noise exposure both within and outside a property.</p>	<p>The health effects of noise are assessed and reported in section 13.9 of Chapter 13 of the Environmental Statement [AS-078].</p> <p>This includes consideration of current (2018, Ref 3.20) WHO guidance on night noise.</p>
Michael Reddington	Noise	<p>6.6.1 BS8233:2014, "Guidance on sound insulation and noise reduction for</p>	<p>British Standard 8233 (Ref 3.21) has been referenced in setting assessment criteria in</p>

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		<p>buildings” is a standard used for the acoustic design of buildings and has adopted WHO guidelines.</p> <p>6.6.2 BS8233 Section 6.3.2”Prediction of noise from aircraft” as a useful introduction.</p>	<p>Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>
Michael Reddington	Noise	<p>6.7.1 Table 6.3 below sets out a suggested BS8233 test procedure to meet the relevant ICCAN recommendations.</p> <p>6.7.2 Appendix A provides the text of the referenced sections from BS8233.</p>	<p>The Draft Compensation Policies, Measures and Community First has been updated to note that a proportionate testing regime will be developed to monitor and as necessary improve the quality control of the scheme going forward. The testing regime will be developed in consultation with the London Luton Airport Consultative Committee and having regard to best practice.</p>
Michael Reddington	Noise	[See Table 6.3: Proposed Insulation Test Procedure in submission]	See response directly above
Michael Reddington	Noise / Health and Community	<p>7.1.1 I was surprised that the Applicant did not utilise or reference CAP 1588 in the DCO. 7.1.2 The aim of this report is to provide an overview of the recent research into and state of knowledge on the effects of aircraft noise and annoyance responses. It is a complex area, and this report is split into sections in order to cover each subject.</p>	<p>The referenced document is a summary of research and does not provide any guidance on how this should be applied to noise assessments or policy making decisions.</p> <p>The more recently published CAP 1506 Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition (Ref 22, published in 2021), does provide such guidance and notes the outcomes of their UK specific research that</p>

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		<p>7.1.3 Chapter 2 addresses the definition of annoyance and how it came to attention as a public issue, the pathways in which annoyance can interact with other health endpoints and external factors, and an explanation of the current thresholds for describing degrees of annoyance.</p> <p>7.1.4 Chapter 3 describes the methodologies used to measure aircraft noise-induced annoyance, and the most commonly used dose-response relationships to date.</p> <p>7.1.5 Chapter 4 discusses the recent developments in research findings over the past ten years or so, and suggestions for how methodologies could be improved for future research.</p> <p>7.1.6 Chapter 5 explains the complexities of how non-acoustic factors can influence the annoyance results and new methods that may be employed to take account of them when designing future annoyance studies.</p> <p>7.1.7 Note that the third of the three aims of NPSE is to improve the quality of life for residents. Under the DCO proposals there is no quality of life improvement, only a deleterious effect, for those living close to</p>	<p><i>“There was no evidence found to suggest that any of the other indicators Lden, N70 or N65 (r2=0.66-0.73) correlated better with annoyance than LAeq,16h” and that “evidence-based decisions should continue to use LAeq,16h”.</i></p> <p>The LAeq metric is therefore used as the primary assessment metric in line with aviation noise policy (Ref 13) and guidance from the Civil Aviation Authority as set out above.</p> <p>Notwithstanding this, supplementary noise metrics including N-above metrics (which are based on the number of events) have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>How the Proposed Development meets the aims of the Noise Policy Statement for England (including how it meets the third aim to <i>“within the context of Government policy on sustainable development... where possible, contribute to improvements to health and quality of life”</i>) (Ref 10) is set out in paragraphs 16.9.6 onwards of Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>

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		<p>the airport and its flypaths. 7.1.8 The DCO makes specious claims about 'quality of life improvements' that could occur when a person currently unemployed gets a job at the airport. This is tenuous at best since any such improvement will only relate to the individual, not an entire community, and the individual may not even live in an affected area anyway.</p> <p>7.1.9 Note:</p> <ul style="list-style-type: none"> a) Figure 17 – correlation of annoyance with the number of events - which would apply to the DCO; b) Figure 20 = annoyance sensitivity related to trust in Authorities and c) Figure 21 for Fairness of decisions. <p>Given that LBC, the Applicant and LLAOL have historically gone ahead with their plans despite there being significant local opposition (e.g. Century Park, 19mppa Variation proposal, non-statutory 32mppa proposal) it could be suggested that all three Figures apply to this DCO.</p> <p>7.1.10 Page 5 suggests that there is a difference in sensitivity for those living near High Rate of Change (HRC) airports and suggest 5dB lowering of effect levels</p>	<p>Research on high-rate change airports is acknowledged, but such research has not influenced the assessment thresholds which have are set by the UK Government (Ref 13).</p> <p>Other comments noted.</p>

Interested Party and Examination Library Reference	Topic	Written Representation (Verbatim)	Luton Rising's Response
		relative to Low Rate of Change (LRC) airports. LLA can only be described as a HRC airport given the huge increases in passengers over very recent years so it behoves the Applicant to consider reviewing the severity levels.	
Michael Reddington	N/A	ATM Air Traffic Movement ICCAN Independent Commission on Civil Aviation Noise LBC Luton Borough Council LR Luton Rising LOAEL Lowest Observable Adverse Effect Level LLA London Luton Airport LLAOL London Luton Airport Operations Limited NIS Noise Insulation Sub-committee NOEL No Observable Effect Level mppa million passengers per annum SOAEL Significant Observed Adverse Effect Level UAEL Upper Adverse Effect Level	Noted

REFERENCES

Ref 3.1 British Standards Institute (2014), BS 5228-2:2009+A1:2014 – Code of practice for noise and vibration control on construction and open sites. Part 2: Vibration. BSi, London.

Ref 3.2 HMSO (1965), Compulsory Purchase Act 1965.

Ref 3.3 HMSO (1973), Land Compensation Act 1973.

Ref 3.4 Institute of Environmental Management and Assessment (2022) Assessing Greenhouse Gas Emissions and Evaluating their Significance. 2nd Edition. February 2022.

Ref 3.5 HM Government (2008) Climate Change Act 2008

Ref 3.6 Department for Transport (2022) Jet Zero Strategy: Delivering net zero aviation by 2050

Ref 3.7 Department for Transport (2018) Airport National Policy Statement: new runway capacity and infrastructure at airports in the South East of England

Ref 3.8 Her Majesty's Stationery Office (1973), Land Compensation Act.

Ref 3.9 Luton Borough Council (2017), Luton Local Plan 2011-2031

Ref 3.10 Department for Environment Food and Rural Affairs (2010), Noise Policy Statement for England

Ref 3.11 Civil Aviation Authority (2021), CAP1506 Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition

Ref 3.12 Civil Aviation Authority (2021), CAP2161 Survey of Noise Attitudes 2014: Aircraft Noise and Sleep Disturbance

Ref 3.13 Department for Transport (2017), Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace.

Ref 3.14 International Civil Aviation Organization (2022), Environmental Trends in Aviation to 2050

Ref 3.15 Department for Transport (2018), Beyond the horizon, The future of UK aviation: Making best use of existing runways

Ref 3.16 British Standards Institute (2014), BS 5228-1:2009+A1:2014 – Code of practice for noise and vibration control on construction and open sites. Part 1: Noise. BSi, London

Ref 3.17 International Civil Aviation Organization (2022), Environmental Trends in Aviation to 2050

Ref 3.18 Eurocontrol, Aircraft Noise and Performance (ANP) Database,
<https://www.aircraftnoisemodel.org/>

Ref 3.19 Civil Aviation Authority (2021), CAP2091: CAA Policy on Minimum Standards
for Noise Modelling.

Ref 3.20 World Health Organisation (2018), Environmental Noise Guidelines for the
European Region

Ref 3.21 British Standard Institute (2014), BS 8233:2014, Guidance on sound insulation
and noise reduction for buildings