

1 November 2023

Registration identification number: 20040654

Application by London Luton Airport Limited for an Order granting Development Consent for the London Luton Airport Expansion

Dear Sir or Madam,

On 10 October 2023, the Examining Authority (ExA) published a set of written questions and requests for information - ExQ1. For those questions which were directed at the Civil Aviation Authority, either solely or along with other interested parties, the table below provides the answers from the Civil Aviation Authority.

BCG.1.6	<p>Airspace Change Process (ACP) Provide an update on the status of the ACP, the timeline for implementation and explain whether this has any implications for the application.</p> <p>CAA answer It is not clear in this question which ACP is being referred to by the ExA. However, we note that the Applicant has stated it will not require an Airspace Change to implement its expansion plans should the DCO be approved.</p> <p>There is a Luton airport ACP related to airspace modernisation (ACP-2018-70) which is currently at step 3a. This Airspace Change forms part of the Airspace Modernisation Masterplan¹, which foresees it as part of the London Terminal Manoeuvring Area cluster. Figure 12 of that document sets out a deployment sequence which shows ACPs for the LTMA deploying no earlier than 2027.</p> <p>The CAA has no information to say whether or not this has any implications for the application, but notes that in REP1-028, the Applicant states in paragraph 1.4.11 that it considers airspace modernisation will have been delivered ‘<i>well before the major step up in capacity can be delivered in Assessment Phase 2a</i>’ and in AS-125, Figure 6.15 shows that major step up in movements to occur after 2035.</p>
AQ.1.5	<p>Runway modal split Does the CAA have any comments regarding the 30:70 runway modal split [AS-028, Appendix 7.1 Air Quality Methodology rev1, paragraph 3.7.6 and Table 3.5] used to inform modelling of</p>

¹ Currently at Iteration 2 – see [UK-Airspace-Change-Masterplan-Iteration-2-Accessible-version.pdf](#)

	<p>emissions and the fact that this differs from the 10 year average 23:77 modal split used for the noise model [AS-096 Appendix 16.1, Section 6.15]? <i>You may wish to link the answer to this question with the answer to NO.1.1.</i></p> <p>CAA answer We consider that, absent any information to the contrary, a historic average of factors such as runway modal split provides the best estimate on which to base noise and other calculations. However, it is important to note that, for noise, the Applicant is modelling 92-day summer season daytime and it is this for which the historical average is 23:77. For air quality, if the Applicant is modelling for 24 hours across the whole year, it would not be surprising if a different historic model split was to be found and therefore used.</p>
GCG.1.4	<p>GCG - Appendix C – Annex C1 DCO noise model assumptions Confirm whether the assumptions/parameters expressed in points a-j of Annex C1 [REP3-023] are acceptable and a reasonable basis for future noise modelling.</p> <p>CAA answer The CAA can confirm that, in its opinion, the assumptions/parameters expressed in points a-j of Annex C1 [REP3-023] are acceptable and a reasonable basis for future noise modelling, providing that point i is intended to indicate the process detailed in Section 7.8 of the Environmental Statement Appendix 16.1 [AS-096]</p>
NO.1.1	<p>Statement of no impediments Confirm whether the CAA considers that it will be able to provide a 'no impediments statement' to the ExA in respect of the Proposed Development, as referenced in the CAA Policy on Minimum Standards for Noise Modelling (CAP2091) and whether the CAA has any comments on the noise modelling information, assumptions (including modal split) and monitoring presented or the appropriateness of the modelling approach set out in ES Chapter 16 [REP1-003], in particular Sections 6 to 9 ES Appendix 16.1 [AS-096]. <i>You may wish to link the answer to this question with your answer to AQ.1.5.</i></p> <p>CAA answer A Statement of No Impediment would only be related to the CAA's duties concerning safety, airspace or economic regulation. We have not raised any principal areas of disagreement concerning the DCO in these areas and therefore consider that this can be taken to be equivalent to a statement of no impediment. Also, we have no further comments on noise modelling than those raised in the statutory consultation and</p>

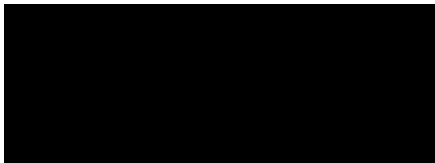
	<p>covered in the draft Statement of Common Ground. We consider that Luton's noise modelling sophistication would be sufficient to meet the standards required for Airspace Change Proposals given in CAP 2091.</p>
<p>NO.1.2</p>	<p>Airspace Capacity Confirm whether the CAA has updated its position since submission of its Relevant Representation [RR-0257, paragraph 3.5] that states <i>“We were not aware of any evidence within the consultation documents to conclude that the projected increase in air traffic movements as proposed by the DCO can be accommodated within the existing airspace structure”</i>. Paragraph 4.3 of the representation appears to reconfirm this position in relation to the DCO proposals.</p> <p>CAA answer The CAA has not updated its position since the relevant representation. However, any attempt to undertake modelling which would provide such evidence would also have to make assumptions about the future quantity and mix of traffic at the other London airports, which would itself be subject to a high level of uncertainty.</p>
<p>NO.1.3</p>	<p>Independent Commission on Civil Aviation Noise (ICCAN) At D3 [REP3-113] the CAA provided a summary of ICCAN functions that the CAA would continue to perform. The letter makes reference to a number of outputs such as an Annual Report on UK aviation noise, aviation noise attitude surveys, noise action plans and work on metrics. Is the CAA able to confirm the programme for publication of any such documents that are likely to be of relevance to the Examination? If so, please submit copies as they become available.</p> <p>CAA answer The work which the CAA is planning to undertake in relation to ICCAN functions is as follows:</p> <p>Aviation Environmental Review. This is a triennial report covering Noise, Local Air Quality and Climate Change (Via Emissions) and the performance of the aviation industry against these topics. It will not report on individual airports or airlines. We will also undertake annualised reporting at a lower level of detail, but which will be more airline- as opposed to airport-focussed. These annual reports will not be live until 2025.</p> <p>Aviation Noise Attitudes Survey. This survey is currently being undertaken with the completion of fieldwork expected in 2024. It is therefore anticipated that early results may be available in 2025 but a full report that has been peer reviewed will likely not be published until 2026.</p>

Noise Action Plan review. Airports' Noise Action Plans run for five-year terms starting this year. Our review is aimed at testing the robustness of the process and quantifying the performance against plan. This review is about the Noise Action Plan policy rather than the plan of any individual airport. It is expected to report in around three years' time and form part of the subsequent cycle of airport Noise Action Plans.

Noise Metrics review. The purpose of this ongoing work is to deliver a guide of how to use noise metrics data allowing the UK consumer easy access to already existing documents that help create a better understanding of how noise and specifically aviation noise is measured and interpreted. This guide is expected to be delivered by the end of this year.

If the ExA has further questions on these or any other topic, we will be happy to provide whatever assistance we can.

Yours sincerely,



Graham French
Head of Network Resilience Policy