



# Responses to ExA Written Questions ExQ1 (PD-010)

Application by Luton Rising to extend London  
Luton Airport

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# 1 Introduction

- 1.1.1 This report provides the response of Luton Borough Council (LBC) as local planning authority (LPA) to the written questions (ExQ1 [PD-010]) of the Examining Authority dated 10 October 2023).
- 1.1.2 The responses are provided in tabular form, with only the questions that were addressed to either Luton Borough Council or the joint Host Authorities being responded to in this document.
- 1.1.3 There have been inputs from the consultants jointly commissioned by the Host Authorities, namely: CASCL (forecasting and need); Genecon (economic and employment), Pinsent Masons (dDCO); and Suono (noise).

ExQ1	Question to:	Question	LBC Response
<b>2 Broad, general and cross-topic questions</b>			
BCG.1.1	All Local Authorities	<p><b>Development Plan policies</b></p> <p>If not already provided in a Local Impact Report (LIR), provide full copies of any Development Plan policies that you have referred to in any of your submissions. Should you refer to any additional Development Plan policies at any time in your future submissions then, if they have not already been provided, please also submit copies of these into the Examination.</p> <p>Have there been any relevant updates to the statutory Development Plans since the compilation of the application documents?</p> <p>Are the local planning authorities content with the Applicant's policy analysis?</p>	<p>LBC's LIR included all relevant policies from the Luton Local Plan 2011-2031(Nov 2017) at the start of each topic section.</p> <p>None relevant, though the Luton Town Centre Design Guide SPD was adopted on 24 July 2023. The SPD provides guidance on the design of residential development and other related uses in the town centre and surrounding areas.</p> <p>The LPA is content with the Applicant's policy analysis.</p>
BCG.1.2	All Local Authorities	<p><b>Neighbourhood Plans</b></p> <p>Can you confirm whether there are any relevant made or emerging neighbourhood plans that the Examining Authority (ExA) should be aware of? If there are can you:</p> <ol style="list-style-type: none"> <li>1. Provide details, confirm their status and – if they are emerging – the expected timescales for their completion;</li> <li>2. Provide a copy of the made plan or a copy of the latest draft.</li> </ol>	<p>There are no neighbourhood plans within Luton.</p>

		3. Indicate what weight you consider the ExA should give to these documents.	
BCG.1.3	Applicant and Interested Parties	<p><b>Central Government Policy and Guidance</b></p> <p>Are you aware of any updates or changes to Government Policy or Guidance (including emerging policies) relevant to the determination of this application that have occurred since it was submitted? If yes, what are these changes and what are the implications for the application?</p>	We are not aware of any updates or changes to Government Policy or Guidance other than the Government's Overarching Aviation Noise Policy published on 27 March 2023, the updated NPPF published on 5 September 2023 (with the insertion of footnote 53a on wind energy), and the Levelling Up and Regeneration Act which received Royal Assent on 26 October 2023.
BCG.1.4	All Local Authorities	<p><b>Updates on development</b></p> <p>Please provide an update on any submitted planning applications or consents granted since the application was submitted that could either affect the Proposed Development or be affected by the Proposed Development and whether these would affect the conclusions reached in the Environmental Statement (ES).</p>	Other than the cross boundary application for a solar farm at land north east of Wandon End (LBC ref: 22/01657/FUL) and the Secretaries of State's decision on the 19mppa application (LBC ref: 21/00031/VARCON), both of which the ExA is aware of, there are no other relevant applications or decisions to update the ExA about.
<b>3 Air Quality and odour</b>			
AQ.1.1	Joint Host Authorities	<p><b>Post-covid air quality data trends</b></p> <p>Provide air quality monitoring status reports for 2023, where not already provided.</p>	Luton's Air Quality Annual Status Report was submitted to the ExA at Deadline 3 (REP3-104).

## 4 Biodiversity

BIO.1.2	Natural England and Joint Host Authorities	<p><b>Nitrogen deposition</b> Provide comment on the appropriateness of applying the approach advocated in the 'Design Manual for Roads and Bridges' to the Local, District and County Wildlife Sites, protected habitats and protected species given the potential sources of nitrogen from the Proposed Development. As part of this, confirm if you are satisfied, or not, with the use of 0.4 kg/N/ha/yr as a maximum dose threshold applied as an average.</p> <p>The effects of atmospheric NO<sub>x</sub> (nitrogen oxides) and NO<sub>2</sub> on all receptors are screened out [AS-027, paragraph 8.5.59] because the equivalent concentrations of sulphur dioxide are not anticipated. Confirm whether or not you agree with this approach.</p>	<p>The LPA is content that the approach advocated in DMRB is appropriate when applied to CWS and DWS within Luton.</p> <p>The LPA is satisfied with the use of 0.4 kg/N/ha/yr as a maximum dose threshold applied as an average.</p> <p>The LPA agrees with the approach adopted by the Applicant in Chapter 8 of the ES (AS-027)</p>
BIO.1.4	Joint Host Authorities	<p><b>Citations for Wildlife Sites</b> Provide citations for all County, District and Local Wildlife Sites listed in Table 8.12 of Chapter 8 [AS-027].</p>	<p>The citations for the District and County Wildlife Sites within Luton are provided in Appendix 1 to this document.</p>

## 5 Compulsory Acquisition and Temporary Possession of land and rights

### General questions

CA.1.2	Affected Persons and	<p><b>Known inaccuracies</b> Are any Affected Persons or Interested Parties aware of any inaccuracies in the BoR [APP-</p>	<p>LBC is not aware of any inaccuracies in the BoR.</p>
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	Interested Parties	011], Statement of Reasons [AS-071] or Land Plans [AS-011] and [AS-024]? If so, please set out what these are and provide the correct details.	
<b>How it is intended to use the land, alternatives and whether rights sought are legitimate, proportionate and necessary</b>			
CA.1.4	All relevant planning and highway authorities and National Highways	<p><b>Reasonable alternatives/ necessity</b> In your roles as the Local Planning Authority and the Highway Authority are you aware of:</p> <ol style="list-style-type: none"> <li>1. Any reasonable alternatives to Compulsory Acquisition (CA) or Temporary Possession (TP) for land sought by the Applicant?</li> <li>2. Any areas of land or rights that the Applicant is seeking the powers to acquire that you consider would not be needed? Please identify which plots these are and explain why you consider they would not need to be acquired.</li> </ol>	The LPA and LHA are satisfied with the proposed approach of the applicant in relation to land within the Council's ownership.
<b>6 Draft Development Consent Order</b>			
<b>Articles</b>			
DCO.1.3	Joint Host Authorities	<p><b>Article 24 – compulsory acquisition of land</b> For precision should paragraph 2 include more articles eg 26, 31, 32, 33, 39 and a reference to Schedule 8</p>	The general approach of applying the compulsory acquisition power to the land within the Order limits and then imposing restrictions on the exercise of that power over land that is proposed to be only possessed temporarily or subject to the acquisition of rights or the imposition

			<p>restrictive covenants, is well precedented. In principle, there is no reason to also include a longer list of provisions in relation to which the power is to be subject.</p> <p>However, the Host Authorities note that the definitions in article 2(1) of “Order land” and “Order limits” appear to be functionally the same, covering all of the land within the Order limits and as a consequence article 36(1)(a) would appear to authorise the compulsory acquisition of statutory undertaker’s land that would otherwise be restricted by article 27(2) (compulsory acquisition of rights and imposition of restrictive covenants) and article 33(1)(a)(i) (temporary use of land for carrying out the authorised development). This does not appear to be the Applicant’s intention as there is no discussion of the effect in the Explanatory Memorandum and the Applicant is requested to clarify its intentions in this regard. While this is a matter for the relevant statutory undertakers to satisfy themselves, the Host Authorities are concerned for the potential disruption to key utilities, and the consequent effects to residents, arising from the inadvertent consequences of this drafting approach.</p>
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DCO.1.8	Applicant, Relevant Highways Authorities and Statutory Undertakers	<p><b>Article 37 – Apparatus and rights of statutory undertakers in stopped up streets</b> Is this article necessary given you are not stopping up any streets?</p>	<p>While this is a matter predominantly for the statutory undertakers concerned, the Host Authorities note that the term “street” is defined in article 2(1) by reference to the definition for that term contained in section 48 of the New Roads and Street Works Act 1991. That definition is sufficiently wide to encompass the public rights of way proposed to be stopped up under article 14. As such the Host Authorities consider that there is the potential need for article 37.</p>
DCO.1.10	Joint Host Authorities	<p><b>Article 47 – defence to proceeding in respect of statutory notice</b> As currently drafted the article carves out a significant number of paragraphs from the Environmental Protection Act 1990 and would also cover both construction and operation. Are you satisfied with the paragraphs that are being carved out and if not, why not?</p>	<p>The Host Authorities acknowledge that section 158 of the Planning Act 2008 provides a defence in civil and criminal proceedings for nuisance subject to any contrary provision in the relevant DCO and that article 47 is intended by the Applicant to be such a contrary provision, as it acknowledges in its Explanatory Memorandum.</p> <p>Paragraphs 4.60 to 4.62 of the Airports National Policy Statement is relevant in that urges the examination of possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990 and under sections 76 and 77 of the Civil Aviation Act 1982 and advises the</p>

			<p>Examining Authority to consider the how the possible sources of nuisance might be mitigated.</p> <p>The Applicant has prepared a Statement of Statutory Nuisance [APP-169], Table 3.1 of which considers each of the categories of statutory nuisance under section 79(1) of the Environmental Protection Act 1990. Table 3.1 indicates that it is the Applicant's view that:</p> <ul style="list-style-type: none"> <li>• (c) (fumes or gasses from private dwellings) is not relevant to its proposed development;</li> <li>• (fb) (artificial light emitted from premises) is not relevant to its proposed development;</li> <li>• (h) (any other matter declared by any enactment to be a statutory nuisance) is not relevant to its proposed development.</li> </ul> <p>Each of section 79(1)(c), (fb) and (h) are proposed to be subject to the statutory authority defence provided by article 47, which is surprising given that it is the Applicant's case that these grounds of nuisance are not engaged by its proposals. It is therefore not clear why the statutory authority defence ought to apply to categories of nuisance which</p>
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			<p>are not anticipated by the Applicant to arise.</p> <p>In relation to the other grounds for which the Applicant seeks the statutory authority defence (which includes (e) dust and odour, (g) noise emitted from premises (ga) noise emitted by vehicles or plant in a street) the Host Authorities have set out elsewhere in submissions their concerns in relation to how these matters have been assessed in the Applicant's Environmental Statement.</p> <p>The key point is that the Host Authorities will be content with the scope of the proposed statutory authority defence only when satisfied that the Applicant's mitigation proposals, and how they are secured through the provisions of the draft Order, is sufficient to prevent a statutory nuisance arising or, if one were to arise, sufficiently enforceable to enable remedial action to be enforced under the provisions of the Order.</p>
DCO.1.11	Joint Host Authorities and Interested Parties	<p><b>Article 52 – arbitration</b></p> <p>In order to manage expectation and ensure consensus should further detail about how the arbitration process would work be included in a Schedule?</p>	<p>The Host Authorities are content with the level of detail in article 52 and note that its current terms provide a degree of flexibility to the arbitrator and the parties to establish a dispute resolution</p>

			procedure that is proportionate to the matter in dispute.
<b>Requirements</b>			
DCO.1.13	Applicant and Joint Host Authorities	<p><b>Requirement 10 – Landscape and biodiversity management plan</b></p> <p>Should (1) include the requirement for the relevant planning authority to consult with Natural England?</p>	LBC does not consider that the requirement should include a stipulation to consult Natural England, rather consultation should be at the discretion of the relevant planning authority.
DCO.1.14	Applicant and Joint Host Authorities	<p><b>Requirement 18 – Interpretation</b></p> <p>To improve precision should the interpretation of Level 2 Plan (b) have ‘including timescales’ inserted after implementation ie ‘the proposed programme for the implementation <b>including timescales</b>’?</p> <p>Mitigation Plan (a) includes the phrase ‘as soon as reasonably practicable’ how does this meet the test for precision and enforceability?</p> <p>Slot regulations are defined with respect to Airport Slot Allocation Regulations 2006 – does the drafting need to allow for any future variation of those regulations eg ‘or successor Regulations’?</p> <p>Technical panel a) refers to Environmental Scrutiny Group (ESG) which isn’t included in interpretations (as it’s covered by Requirement 20) but should this be in full? And for precision</p>	<p>The Host Authorities support the amendment suggested by the Examining Authority in relation to timescales.</p> <p>In relation to the use of the phrase “as soon as reasonably practicable” in the definition of “Mitigation Plan” the Host Authorities do have some concerns. In view of the fact that the Applicant has set what it considers to be the maximum acceptable “Limits”, it is of critical importance to residents that exceedances of the Limits are mitigated promptly. In the context of the exceedance of a Limit it is reasonable to anticipate that the undertaker will have taken action, via a Level 2 Plan to avoid exceeding a Limit and yet, despite those efforts, an exceedance of a Limit has nonetheless occurred. When seen in that</p>

		<p>after ESG should 'as set out in the terms of reference' be included?</p>	<p>context a duty to prepare a Mitigation Plan that must include measures designed to avoid an exceedance of a Limit "as soon as reasonably practicable" is likely to be largely without teeth; "reasonably" practicable methods are likely to have been tried and will have failed.</p> <p>A more appropriate formulation, which reflects the escalating nature of the proposed Green Controlled Growth Framework would be "(a) details of the proposed mitigation and actions which are designed to promptly avoid or prevent exceedances of a Limit; and" It is generally unnecessary to include in a statutory instrument a reference to 'successor Regulations'.</p> <p>The Host Authorities are content that the terms of reference in relation to the ESG are adequately secured by paragraph 20(4) and consider that conformity with the terms of reference is better secured via an operative provision in the body of the requirement instead of being left to a definition in the interpretation provisions</p>
DCO.1.15	Applicant and Joint Host Authorities	<b>Requirement 20 – Environmental Scrutiny Group Paragraph 2</b>	The Host Authorities do not have an issue with the undertaker establishing the technical panels in accordance with

		<p><b>Applicant:</b> A number of organisations have raised concerns about the appointment of the independent chairperson and independent aviation specialist, the concern being that, whilst their appointment would need to be approved by the Secretary of State, their selection would be by Luton Borough Council in consultation with the airport operator – what do you think could be done to alleviate these concerns?</p> <p><b>Paragraph 6</b>  <b>Everyone:</b> As currently drafted the undertaker would be responsible for establishing the technical panels. Should this be the ESG? If not, why not?</p>	<p>the requirements of the DCO – on the basis this is something that practically needs to happen/is procedural.</p>
DCO.1.16	Applicant and Joint Host Authorities	<p><b>Requirement 23 – Exceedance of Level 2 threshold</b>  <b>Paragraph 2</b>  <b>Applicant:</b> As drafted this refers to the ESG certifying that a Level 2 threshold has been exceeded. Given the ESG is not a regulatory body, can it certify this or should it be ‘confirmed in writing’?</p> <p><b>Paragraphs 4 and 6</b>  Sets out that the ESG have 21 days to approve or refuse a plan, otherwise it is a deemed consent. Unlike other requirements this does not include the ‘unless otherwise agreed in writing’ tailpiece so, as drafted, there is no flexibility to extend the timescale by agreement</p>	<p>While this part of the question is directed to the Applicant, the Host Authorities are content that a body such as the ESG is capable of “certifying” a matter for the purposes of requirement 23.</p> <p>The Host Authorities have set out elsewhere their concerns with the adequacy of the Green Controlled Growth mechanism and their concerns with the timescales related to it. Given the need to assemble the representatives of the ESG, consider what may be quite considerable submissions and take the necessary</p>

		<p>– is this reasonable and is the 21 day timeframe appropriate? If not, why not and what timeframe would be appropriate?</p>	<p>technical advice 21 days is too short a determination period. The Host Authorities would suggest that a period of 8 weeks to be appropriate. This would be the equivalent to the time afforded to a local planning authority to determine an application for planning permission for development that is not major development under article 34(2)(b) of the Town and Country Planning (Development Management Procedure) Order 2015. This period is both challenging, recognising the importance of bringing forward nationally significant infrastructure promptly, whilst also being realistic in relation to the logistical and technical challenges posed by the GCG mechanism and its deemed consent provisions. Of course, in the circumstances where the production of a Level 2 Plan is necessary, the constituent members of the ESG will be incentivised to take the decisions necessary to ameliorate the adverse effects of the proposed development as promptly as it is able to do so.</p> <p>In relation to the drafting point, the Host Authorities would welcome the addition of wording that would enable the ESG and undertaker to agree in writing to vary</p>
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			the determination periods referred to in the question.
DCO.1.17	Luton Borough Council and the Applicant	<p><b>Requirement 28 – Fixed plant noise management plan</b></p> <p>Further to ISH5 and the Joint Host Authorities' post hearing submissions, confirm whether agreement has been reached on the 10 decibels (dB) below background noise levels criteria for the Fixed Plant Noise Mitigation Plan?</p> <p><b>Applicant:</b> Why is there a difference between the consented scheme and the current application?</p> <p><b>Both:</b> Should the noise levels be secured in the requirement?</p>	<p>The Applicant has agreed to the criterion of 10 dB below background for fixed plant noise.</p> <p>The Fixed Plant Noise Mitigation Plan is secured under Part 4 of the Draft Development Consent Order [REP3-003]. Fixing noise levels within this plan may hinder accurate assessment of plant items against relevant limits, given that it is not yet known over what periods plant items will be running, as one example.</p>
DCO.1.19	Joint Host Authorities	<p><b>Requirement 39 – Application of Part 8 of the Planning Act 2008</b></p> <ol style="list-style-type: none"> <li>1. As currently drafted, this would appear to seek to limit the requests for enforcement action to the two scenarios listed in the requirement. Is this appropriate?</li> <li>2. As currently drafted, there is no right of appeal against a situation where a request for enforcement action has been declined. Should there be and should this be dealt with by Article 52 (arbitration) or should the appeal be to the Secretary of State?</li> </ol>	<p>1. We note that the three Hertfordshire authorities have queried at paragraphs 9.1.79 to 9.1.80 of their joint Local Impact Report [REP1A- 003] why requirement 39 would not permit an enforcement request to be made by a specified local authority where there is a failure to produce a Level 2 Plan or Mitigation Plan and where there is a failure to act appropriately in relation to future airport capacity declarations. We also note the Applicant's response to this submission is set out in [REP3-090] to note "where appropriate the Applicant will provide a</p>



			<p>response at Deadline 3 alongside an updated DCO". As the updated DCO does not appear to address the issue the three Hertfordshire authorities assume that the Applicant disagrees, though they are not clear on the Applicant's reasons for disagreeing.</p> <p>2. The Host Authorities are content for decisions on whether to enforce are left to the judgement of the relevant planning authority which would be subject to the supervision of the courts on traditional public law grounds as would be the case absent the provisions of requirement 39. The Host Authorities consider that it would be inappropriate to make a disagreement in relation to the taking or otherwise of regulatory enforcement action to be subject to arbitration. To do so would result in an authority subjecting the exercise of its statutory functions to an appointed independent person who, while that person may have the necessary expertise and capacity to manage a dispute, would lack a democratic mandate.</p>
DCO.1.20	Joint Host Authorities	<p><b>Phasing</b>  Many of the requirements refer to 'no part of the authorised development may commence until a...for the construction of that part has been submitted to...'. In addition, mitigation of the</p>	<p>The Host Authorities responded to this issue in their Issue Specific Hearing 1 – Draft Development Consent Order Post Hearing Submission [REP3-108], see in</p>

		<p>effects of the Proposed Development are predicated on various works or measures being in place before certain operations are commenced.</p> <p>In order to manage the discharge of requirements and to ensure certain elements of the scheme don't come forward/ start to operate without all of the necessary works being completed, is a phasing and/ or masterplan requirement needed? If not, why not and, if it is, provide a form of preferred drafting.</p>	<p>particular the post hearing note under paragraph 2.14. In summary the Host Authorities are not currently seeking a specific phasing requirement but do wish to ensure that there is clarity around what constitutes a part. The Host Authorities undertook to review the Applicant's written responses in this regard.</p> <p>The Applicant's response is contained in section 5.4 of its Post Hearing Submission for Issue Specific Hearing 1 [REP3-048]. The Applicant's response indicates that it will consider additional drafting to assist the relevant planning authorities to keep track of which "parts" of the project are being discharged for Deadline 4.</p> <p>The Host Authorities look forward to reviewing the Applicant's considered response and will provide an update to the Examining Authority once they have had the opportunity to review the Applicant's Deadline 4 submissions.</p>
DCO.1.21	Applicant and Joint Host Authorities	<p><b>Decommissioning</b></p> <p>Should the draft DCO include a requirement to deal with decommissioning? If not, why not? If it should, provide suitable drafting, and, given the duration of the Proposed Development, consider whether the drafting would need to</p>	<p>Whilst such a requirement might be appropriate for a development such as a solar farm, LBC considers that such a requirement would not be appropriate for this development as the proposal relates</p>

		include a requirement for an assessment of the impacts of decommissioning?	to an operational airport where much of the infrastructure already exists.
DCO.1.22	Applicant and Joint Host Authorities	<p><b>Register of requirements</b></p> <p>Given the number of proposed requirements that would require discharging, some of which would need to be discharged multiple times over an extended period of time, is a requirement that would require the undertaker to establish and maintain an electronic register of requirements that require further approvals needed? If not, why not? And if yes would the suggested drafting below be appropriate?</p> <p>Suggested Drafting:</p> <ol style="list-style-type: none"> <li>(1) The undertaker must, as soon as practicable following the making of the Order, establish and maintain in an electronic form suitable for inspection by members of the public, the joint host authorities and other interested bodies a register of those requirements contained within Part 1 of this schedule that provide for further approvals to be given by the relevant planning authority, the relevant highway authority or the Secretary of State.</li> <li>(2) The register must set out in relation to each requirement the status of the requirement in terms of whether any approval to be given by the relevant planning authority, the relevant highway authority or the Secretary of State has</li> </ol>	<p>The Host Authorities are supportive of a requirement for the Applicant to maintain a publicly accessible register in relation to the requirements included in the draft Order.</p> <p>The general thrust of the suggested drafting is appropriate, but there is scope for it to be more closely integrated within the drafting of Schedule 2. In particular, it is important that the scope of the requirements to be included in the register includes both the construction matters included in Part 2 and the operational matters included in Part 4, together with any application to amend the approved details under paragraph (2), which is contained in Part 1. Given the importance of making public the requirements governing operation for the duration of the operation of the proposed development, it is not appropriate for the obligation to maintain the register to cease after 3 years of operation.</p> <p>The Host Authorities suggest the following amendments and would welcome engagement with the Applicant</p>

		<p>been applied for or given, providing an electronic link to any document containing any approved details.</p> <p>(3) The register must be maintained by the undertaker for a period of three years following the completion of the authorised development.</p>	<p>on the proposed drafting for a requirements register.</p> <p>(1) The undertaker must, as soon as is practicable following the making of the Order, establish and maintain in an electronic form suitable for inspection by members of the public, the relevant planning authorities <del>joint host authorities</del> and other relevant persons, <del>interested bodies</del> a register of those requirements contained within Parts 1, 2 and 4 of this <del>s</del>Schedule that provide for <del>further</del> any consent, agreement or approvals to be given by a discharging body, <del>the relevant planning authority, the relevant highway authority or the Secretary of State.</del></p> <p>(2) The register must set out in relation to each such requirement <del>the its status of the requirement</del> in terms of whether any application has been made to a discharging body and whether or not any consent, agreement or approval has been granted, together with <del>approval to be given by the relevant planning authority, the relevant highway authority or the Secretary of State</del> has been applied for or given, providing an electronic link to any document comprised in such an application or in details that have been approved,</p>
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			<p>consented to or agreed. <del>containing any approved details.</del></p> <p><del>(3) The register must be maintained by the undertaker for a period of three years following the completion of the authorised development.</del></p> <p>The above amendments would require the definition of “discharging body” contained in paragraph 37(1), to be moved to paragraph 1(1).</p>
DCO.1.24	Joint Host Authorities, any other public authority, body or organisation affected by the Proposed Development and Interested Parties	<p><b>Missing requirements</b></p> <p>Review the requirements as drafted. If you consider that there are requirements that are currently not included provide details including any preferred drafting and an explanation of why they would need to be included.</p>	<p>We note that the joint Local Impact Report [REP1A- 003] of the Hertfordshire Authorities set out the results of their initial review of, among other matters, the requirements included in the draft DCO. A consistent theme arising from their review was that the efficacy of the requirements relies on the suitability of the underlying subordinate outline documents, plans and strategies. The five Host Authorities are proceeding on the basis that agreement can be reached on the necessary technical details but if this proves not to be the case the Host Authorities reserve their position and will table the proposed requirements necessary to address their outstanding concerns.</p>

## 7 Green Controlled Growth (GCG)

**Please note:** The references to GCG measures relate to the application version of the GCG framework, explanatory note and appendices and which were discussed at ISH1 and ISH3, unless otherwise stated. Where any matters identified below are addressed by updates to the GCG documentation submitted at D3, signpost to where this information is now provided.

GCG.1.4	All Local Authorities and CAA	<p><b>GCG - Appendix C – Annex C1 DCO noise model assumptions</b></p> <p>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>The points listed in a-j are acceptable, noting that these are followed by the following caveat in the Green Controlled Growth Framework Appendix C – Aircraft Noise Monitoring Plan [REP3-023], “Departure from the above parameters/assumptions, such as the use of more up-to-date software methodologies, shall be allowable if agreed with the GCG Noise Technical Panel.” This caveat is also acceptable.</p> <p>It is the Host Authorities’ expectations that the model used within the DCO (or the specific inputs within the model) is to be passed to the relevant body / company to undertake future modelling, rather than a new model developed from scratch. This is based on discussions held with the Applicant and would prevent any unintended differences between future modelled contour sizes and those stated within the application documents.</p>
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GCG.1.5	All Local Authorities	<p><b>Quota Counts</b></p> <p>Confirm whether the approach to calculating day and night-time quota counts in Noise Envelope – improvements and worked example [REP2-032] would form an acceptable basis for noise control on exceedance of a Level 1 and Level 2 thresholds.</p>	<p>The approach taken to using Quota Counts (QC) as forward planning indicators is set out in Section 5.1 Improvement #1 in the Noise Envelope – Improvements and Worked Example [REP2-032].</p> <p>As set out, equivalent QCs would be calculated for noise contour areas (Threshold 2 and GCG noise Limit), which are then used to allow slot capacity declarations. This process would be an internal tool for the airport operator and appears a sensible and acceptable way to control exceedances of Threshold level 2 and Limits.</p> <p>The internal QC process only proposes once Threshold level 1 is exceeded. In the Host Authorities' view however, it would be far more appropriate to maintain this internal QC process at all times, firstly to ensure that there cannot be a jump from below Threshold 1 to above Limit in such a short timeframe that a breach cannot be prevented; and secondly to avoid slot allocations being declared that potentially cannot be withdrawn.</p>
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			<p>Separately, within Section 5.1, it states that one outcome of the internal QC process would be, “as part of the bi-annual process<sup>8</sup> of slot management and capacity declaration;” with footnote 8 reading, “Twice each year, once for winter and once for summer”.</p> <p>Given that the only noise control proposed through GCG covers solely the summer 92-day period (against the expectations of the Host Authorities), it is not clear why the internal QC process would be involved in allocating winter slots, as there is no corresponding limit against which to compare the equivalent QC.</p>
GCG.1.12	Applicant and Joint Host Authorities	<p><b>GCG Appendix A – Draft ESG Terms of Reference [REP3-019]</b></p> <p><b>Applicant:</b> Explain why the threshold for ESG being quorate in paragraph A2.2.1 has been revised from “<i>where the independent chair and independent aviation specialist (or a substitute agreed as per paragraph A2.1.12) and at least 50% of other representatives are present</i>” to “<i>where the independent chair, independent aviation specialist and slot allocation expert (or a substitute agreed as per paragraph A2.1.12) are present</i>”.</p> <p><b>Joint Host Authorities:</b> Is this change acceptable and if not, why not?</p>	<p>The Host Authorities understand that the rationale for reducing the Quorate to independent chair, independent aviation specialist and slot allocation expert relates to a review of the Terms of Reference by the applicant to ensure that the ESG could still function if there were a failure (however unlikely) to secure 50% of the other members. Given the importance of the role of ESG the host authorities are of the view that their engagement in ESG and the decisions that it makes is crucial and that it is entirely appropriate for the DCO to make</p>



			provision for and require a reasonable representation of other members to be present. The text should be returned to “where the independent chair and independent aviation specialist (or a substitute agreed as per paragraph A2.1.12) and at least 50% of other representatives are present”.
GCG.1.13	Applicant and Joint Host Authorities	<p><b>GCG Appendix B – Draft Technical Panels Terms of Reference [REP3-021]</b></p> <p><b>Applicant:</b> Explain why the threshold for a technical panel being quorate in paragraph B2.2.1 has been revised from “<i>where the independent technical expert and at least 50% of any other approved representatives (as per Paragraph B2.1.7) are present</i>” to “<i>where the independent technical expert is present.</i>”</p> <p><b>Joint Host Authorities:</b> Is this change acceptable and if not, why, not?</p>	<p>The Host Authorities understand that the rationale for reducing the Quorate to where the independent technical expert is present relates to a review of the Terms of Reference by the applicant to ensure that Technical Panels could still function if there were a failure (however unlikely) to secure 50% of other approved representatives. Given the importance of the role of the Technical Panels the host authorities are of the view that their engagement in them is crucial and that it is entirely appropriate for the DCO to make provision for and require a reasonable representation of approved representatives to be present. The text should be returned to “where the independent technical expert and at least 50% of any other approved representatives (as per Paragraph B2.1.7) are present”.</p>

GCG.1.15	Applicant and Joint Host Authorities	<p><b>GCG Appendix B – Draft Technical Panels Terms of Reference [REP3-021]</b></p> <p><b>Applicant:</b> Explain why meetings of the Technical Panel would only be at the discretion of the technical expert as set out in B2.5.1.</p> <p><b>Joint Host Authorities:</b> Is this change acceptable and if not, why not?</p>	<p>No. The Chair of a Technical Panel is to do just that – to chair proceedings. It should not be their role to decide whether or not meetings take place. If it is considered there needs to be some form of provision made for Technical Panels not meeting, then it should be crafted in a manner where it is assumed that meetings will happen unless there is agreement of membership otherwise.</p>
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## 8 Need

NE.1.6	Applicant, All Local Authorities and Harpenden Society	<p><b>Exports</b></p> <p>The Need Case [AS-125, Section 4.4] focuses on trade and the percentage of exports in goods by sector for this region where it is stated 30% of Gross Value Added (GVA) in the East of England derives from exports, reflecting that the region has a strong international focus with growing need for international connectivity. Given that the Need Case identifies limited growth in cargo operations, where any additional cargo would only occur when longer haul flights are potentially introduced in the later phases of the development, how significant a contribution could growth at the airport have to exports in the East of England?</p>	<p>The Five Host Authorities economic consultants, Genecon, advise that focussing on cargo growth as the primary measure of how expansion at the airport can drive exports is perhaps not the right way to look at this issue.</p> <p>Undoubtedly, the export of cargo goods is important, and the airport will have an important role to play enabling the transportation of high value exports - the Need Case at para 4.3.6 highlights that Luton, the Three Counties and the Six Counties, have above average employment in High Tech Manufacturing clusters. The graphs included highlight for example Stevenage, Welwyn Hatfield, Chiltern, East Hertfordshire and</p>
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			<p>South Bucks having double the rate of employment in High Tech Manufacturing compared to the national average. Stevenage, is known to be on track to develop into the most important cluster in the field of cell and gene therapy across Europe. This is important, high value export output. It does not necessarily however equate to high tonnage, as much of the area's output is in high value R&amp;D fields involving international collaboration.</p> <p>Section 4.4.3 of the Need case is perhaps on the right lines highlighting the dominance of services activities – stating that these account for around 77% of regional GVA in the East of England (compared to the average of 75% for regions outside of London).</p> <p>Although not highlighted in the Need case, there is a weight of research evidence that can be drawn upon to highlight the importance of airports as growth generators – for example, Conventz and Thierstein's research (2012) which points to how airports and their vicinities are no longer perceived as purely transportation nodes, but are now seen as advantageous business locations offering a crucial competitive</p>
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			<p>advantage – accessibility and rapid global connectivity. They draw the link between airport location and the clustering of Knowledge Economy businesses – defining these as the combination of advanced producer services (finance, insurance etc) and companies working in high-technology sectors.</p> <p>PwC have also looked at the issue preparing their report entitled <i>Econometric Analysis to Develop Evidence on the Links Between Aviation and the Economy</i>, (PwC, 2013). Their work attempts to quantify the link, reporting that a 10% increase in seat capacity increased the UK's goods exports by 3.3%, goods imports by 1.7%, service imports by 6.6% and service exports by 2.5%.</p> <p>Therefore, the issue of the importance of the airport's growth to exports in the East of England is a more nuanced argument which should consider not only the export of high value goods (as cargo), but the importance of the role of the airport as a hub that can play an increasingly important role in driving information and knowledge exchange, and therefore supporting the growth of</p>
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			<p>high value service sectors of the area's economy.</p> <p>The Need Case does not set these arguments out particularly well, and undoubtedly more analysis could be provided to highlight these links.</p> <p>We look forward to the Applicant's response to this question and Deadline 4 and will comment further should that be necessary.</p>
NE.1.11	Joint Host Authorities and Chris Smith Aviation Consultancy Limited	<p><b>Impacts on forecasting assumptions</b></p> <p>In respect of the comments made in the Initial Review of DCO Need Case [REP2-057, paragraph 3.37], which sets out potential weaknesses in the assumptions used by York Aviation, what effect of Brexit, long term effects of the pandemic and the Russian invasion of Ukraine have on the forecast assumptions? Would this be a major effect on the forecast assumptions or simply delay the anticipated growth?</p>	<p>These potential weaknesses in the economic growth assumptions from these known events (in addition to any arising from 'unknown unknowns') will delay growth. On their own, these three known events should not have a major effect. However, they should be considered alongside other delays which could arise from the weaknesses in the price assumptions. and Dr Smith's predicted 5 to 7 year delay from the underestimation of the capacities of Heathrow and Gatwick, (since these airport operators will strive to make maximum use of their runways in the absence of caps on passenger throughput).</p>

## 9 Noise

NO.1.11	Applicant and Luton Borough Council	<b>Future fleetmix – larger aircraft</b> Explain whether use of larger aircraft in future scenarios would lead to different modes of operation at the airport e.g. due to runway length or flight profiles and if so how would this effect the conclusions of the ES?	It is not considered that the use of larger aircraft would affect the conclusions of the ES since the numbers of larger aircraft anticipated are small (8,820 annual movements in 2043) and some of these aircraft, such as the A321, are already operating at Luton.
NO.1.20	Luton Borough Council	<b>Luton Borough Council Environmental Protection - planning and noise guidance</b> Explain the status of the Luton planning and noise guidance and the extent to which the Proposed Development should be subject to achieving the 55 dBLAeq (1hr) criteria for outdoor amenity.	The 'Planning and Noise Guidance' is a document prepared by the Council's environmental health team and it is neither supplementary planning guidance nor a supplementary planning document. With regard to the standard quoted for outdoor amenity, this very much relates to new commercial or industrial development and the impact upon existing residential properties (including their gardens), however, ground and air noise are both existing sources, and the guidance sets limits for new sources.

## 10 Physical effects of development and operation

### Design

PED.1.2	Applicant (1 only), Luton Borough Council (1 and 2), and All Local	<b>Masterplan</b> It is noted that the Design and Access Statement [AS-049] explains that a masterplan was presented as part of the consultation process for the Proposed Development. Policy LLP6B in Luton Local Plan 2011-2031 sets	As set out in LBC's LIR, the Local Plan period is up to 2031 and the DCO envisages development beyond this period. The Local Plan was adopted in 2017, after the 18mppa development
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	<p>Authorities (2 only)</p>	<p>criteria to be met for airport expansion proposals, where applicable/ appropriate having regard to the nature and scale of such proposals. Part iii) is where proposals are in accordance with an up-to-date Airport Master Plan published by the operators of London Luton Airport and adopted by Luton Borough Council.</p> <ol style="list-style-type: none"> <li>1. Are the proposals in accordance with an up-to-date Airport Master Plan published by the operators of London Luton Airport which has been adopted by Luton Borough Council? If yes, please submit details.</li> <li>2. If no, should there be a requirement added to the draft DCO for a detailed masterplan to be developed post-consent to set out in more detail how the Proposed Development would be delivered, including phasing of works?</li> </ol>	<p>had been approved, which envisaged the airport expanding to 18mppa by 2028. The Master Plan at that time related to an 18mppa operation. In 2020 the airport operator consulted upon a new Master Plan, which was formally submitted with the 19mppa application in January 2021 and adopted by the Council in November 2021.</p> <p>The proposals are not in accordance with the current airport Master Plan which allows for a 19mppa operation. However, the plans go well beyond the plan period and if approved the DCO would be the new Airport Master Plan.</p> <p>The Government guidance on airport Master Plans appears in Annex B of the Aviation Policy Framework (2013). Airport Master Plans are expected to address: forecasts; infrastructure proposals; safeguarding and land/property take; impact on people and the natural environment; and proposals to minimise and mitigate impacts. The DCO covers all these aspects and it is considered that a Master Plan would only repeat the information already supplied.</p>
<p>PED.1.5</p>	<p>Luton Borough Council</p>	<p><b>Design review</b> Paragraph 133 of the National Planning Policy Framework (NPPF) states local planning</p>	<p>Policy LLP25 in the Luton Local Plan addresses High Quality Design and notes, inter alia that “The Council will use</p>

		<p>authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. Paragraph 133 goes on to state that in assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.</p> <p>Given the proposed size and scale of development and the extent of post approval consents that will be required by Requirement 5 of the draft DCO to authorise detailed aspects of the development, please explain:</p> <ol style="list-style-type: none"> <li>1. what processes the Council currently has when assessing the design suitability of large-scale development; and</li> <li>2. whether it would be appropriate for any post consent approval process to be subject to a design review process that would be carried out by an independent design review panel to ensure that the highest standards of design are secured.</li> </ol>	<p>a Design Review Panel to review major development proposals where appropriate and will take into consideration its recommendations when considering applications.”</p> <p>On significant major developments, the LPA enters in to a Planning Performance Agreement (PPA) with applicants. Each PPA is tailored to the individual project and can include design review, with the applicant agreeing to meet the costs of the design review process.</p> <p>LBC engages with Design South East for design review on major projects and would anticipate that certain elements of the Luton Airport Expansion DCO would be subject to design review, with the Applicant agreeing to meet the costs of this process through the Section 106 Agreement. Elements that would be appropriate for consideration under the design review process include those in the public realm, namely, Terminal 2 and its plaza and the 400 bed hotel.</p> <p>Unlike the New Century Park planning permission (LBC ref: 17/02300/EIA) which included a planning condition requiring design codes to be submitted, it is not considered that design codes</p>
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			would be required in relation to the DCO. The New Century Park development includes numerous buildings that are to be delivered in a phased manner, thus it was appropriate for design codes to cover the industrial quarter (Phase 2) and the office and hybrid quarter (Phase 3), with these design codes then informing the subsequent submission of the reserved matters for those phases.
<b>Historical Environment</b>			
PED.1.11	Joint Host Authorities	<p><b>Heritage Assets scoped out of the ES</b></p> <p>Comments have been raised in submissions raising concerns that designated heritage assets have been scoped out of the assessment that should have been included.</p> <p>Based on the content of Section 10.7 of ES Chapter 10, can you advise what assets should be included in the assessments that appear to have been scoped out and why?</p>	<p>In ISH6 LBC commented upon Hart House and Wigmore Hall Farmhouse and this was further addressed in LBC's post hearing submission of 5 October 2023 (REP3-106).</p> <p>The LPA does not consider that any additional heritage assets in Luton should be scoped in to the assessment.</p>
PED.1.15	Applicant and Joint Host Authorities	<p><b>Cultural Heritage Management Plan (CHMP)</b></p> <p><b>Applicant:</b> The CHMP [APP-077, paragraph 10.1.3] states that if the local planning authority determines in writing that the archaeological remains require further investigation, no construction operations are to take place within 10m of the remains until provision has been made for further investigation and recording in accordance with details set out in a Site Specific Written Scheme of Investigation (SSWSI) which</p>	<p>With regard to the wording on the CHMP [APP-077, paragraph 10.1.3], LBC's archaeological advisor suggests that it should be reworded as follows:</p> <p><i>"If the local planning authority determines in writing that the archaeological remains require further investigation, or preservation in situ, no</i></p>

		<p>will be submitted to, and approved in writing by, the relevant local planning authority in consultation with Historic England, as applicable.</p> <p>The wording 'which will be submitted to, and approved in writing by, the relevant local planning authority' implies that the relevant local planning authority are automatically bound to approve a SSWSI. Please reword this paragraph.</p> <p><b>Joint Host Authorities:</b> Section 2.1 of the CHMP states that the Applicant would appoint an Archaeological Clerk of Works (ACoW) who would manage the programme of archaeological investigation and ensure compliance with the CHMP and each SSWSI.</p> <p>Are the councils content that the appointment process of the ACoW, who would ultimately have responsibility amongst other matters for ensuring compliance with the DCO, rests solely with the Applicant? If not, should provision be made for the local authorities to approve the appointment of the ACoW?</p> <p><b>Joint Host Authorities:</b> Except for Section 9 in respect of air quality monitoring at Someries Castle, which is subject to further review, are you otherwise in agreement with the measures in the CHMP?</p>	<p><i>construction operations are to take place within 10 metres of the remains until provision has been made for mitigation. The details of the mitigation will be set out in a SSWSI which will be submitted to the relevant local planning authority's Archaeological Advisor (in consultation with Historic England, as applicable), for review and/or comment. The final version of the SSWSI will then be submitted to and approved in writing by the relevant local planning authority."</i></p> <p>It is not normal practice for Local Authority Advisors to be directly involved with the appointment of either ACOW's, Archaeological Contractors or Archaeological Consultants. LBC's archaeological advisor suggests that developers appoint professionals that are registered with the Chartered Institute for Archaeologists and use companies that have a demonstrated track record of delivering on comparable developments. The LPA advisors have the responsibility for monitoring the archaeological work to ensure compliance with the agreed archaeological scheme of work (in this case that set out in the CHMP and any SSWSIs), but the Local Authority's</p>
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			<p>Advisors are not ultimately responsible for the delivery of that work.</p> <p>LBC's archaeological advisor suggests the follow re-wording to make it clear that the local authority is not ultimately responsible:</p> <p><i>"The relevant Local Authority archaeological advisor will be responsible for monitoring the work of the ACOW and Archaeological Contractor to ensure that the requirements relating to cultural heritage set out in of the DCO are met. The relevant Local Authority archaeological advisor will be responsible for final sign off and approval of all mitigation measures."</i></p>
<b>Landscape and Visual Impacts</b>			
PED.1.16	Applicant and Joint Host Authorities	<p><b>Methodology</b></p> <p>Chapter 14 of the ES [AS-079, paragraph 14.5.7] advises of the distinction between the terms 'impact' and 'effect' in the Guidelines for Landscape and Visual Impact Assessment third edition (2013) (GLVIA3) and that the term 'impact' should not be used to mean a combination of several effects. The paragraph then goes on to state that the Landscape and Visual Impact Assessment (LVIA) varies from this advice and refers to 'magnitude of impact,'</p>	LBC has no comment in respect to the approach adopted to the methodology and use of terminology in the LVIA.

		<p>even when describing a combination of several effects.</p> <p>Chapter 5 of the ES [AS-075, paragraph 5.4.40] states that to provide consistency across topics within the Environmental Assessment, the methodology as described in Chapter 5 will be adopted, although where topic-specific alternatives exist (following industry-wide guidance or best practice) these have been presented within the relevant aspect assessment chapters of this ES.</p> <p><b>Applicant:</b> Given the guidance in GLVIA3, which contains a topic-specific alternative, explain further why the term ‘magnitude of impact’ has been used as opposed to ‘magnitude of effect’ when judging the significance of effects in the LVIA. Explain further why this variance does not compromise the assessment, as stated in paragraph 5.6.1 of Appendix 14.1 of the ES [AS-036].</p> <p><b>Joint Host Authorities:</b> Do you have any comments on the approach adopted to the methodology and use of terminology in the LVIA?</p>	
PED.1.17	Applicant and Joint Host Authorities	<p><b>Methodology</b></p> <p><b>Applicant:</b> Appendix 14.1 of the ES [AS-036, Tables 5.3 and 6.8] sets out the judgements of the magnitude for both landscape and visual impacts being recorded as high, medium, low,</p>	LBC understands from the ES methodology (AS-036) that ‘very low’ applies where the change is ‘barely noticeable’ or negligible whilst ‘high’ is

		<p>very low or no change for both adverse and beneficial. Recognising the comments in ES Volume 5, Appendix 1.4 [APP-047, page 77/ electronic page 80], please explain further:</p> <ol style="list-style-type: none"> <li>1. why a category of 'very high' has not been included but a 'very low' category has; and</li> <li>2. the extent to which the inclusion of a 'very high' category, or removal of the 'very low' category, would change the assessment of effects.</li> </ol> <p><b>Joint Host Authorities:</b> Noting the comments on this point in the report by Vincent and Gorbing - Response to Scoping Report (on behalf of the host authorities) [APP-168], Electronic Page 184 (report page 46) in paragraphs 4.148 and 4.149, please provide further comments on this matter and a response to point 2 above.</p>	<p>used where the change results in 'total loss' if adverse, or 'large scale improvement' if beneficial.</p> <p>Chapter 14 of the ES (AS-075) has no impacts that are either high adverse (the greatest magnitude is medium to high adverse for Wigmore Valley Park) or high beneficial (the greatest beneficial effect being assessed as 'moderate'), therefore the use of 'very high' would be immaterial</p> <p>Vincent Gorbing's comment in response to the Scoping Report in April 2019 (APP-168) was a suggestion. LBC does not consider that the LVIA should be overly mechanistic but rather its outcomes will be dependent upon the considered decisions of the professionals providing the assessment.</p>
PED.1.19	Applicant and Joint Host Authorities	<p><b>Assessment of Significant Effects</b>  <b>Applicant:</b> There appear to be some discrepancies in the assessment of significance effects in Appendix 14.5 of the ES [AS-139]. For example, in the table in Section 2 'Construction Phase 2a – Visitors to Wigmore Valley Park' (page 41) the assessed effect is to remain a moderate adverse effect which is stated to be 'not significant' but Phase 2b, which is considered to also have a 'moderate adverse' effect, is stated to be 'significant'. Explain why a</p>	<p>Whilst it may be possible to have a moderate effect that could be either significant not significant, it is assumed that with regard to Wigmore Valley Park and the effects identified that this is a simple typographical error. LBC awaits the response from the Applicant to this question at Deadline 4.</p>

		<p>different conclusion on significance is reached for the same judged effect?</p> <p>If this is a typographical error, please review all findings to ensure that the correct assessment of effects is reported.</p> <p><b>Joint Host Authorities:</b> Are you in agreement with the assessment findings on significant effects on the receptors assessed in Appendices 14.4 [AS-086] and 14.5 [AS-139]? If not, advise where disagreement on the findings exist and how this may affect conclusions.</p>	<p>LBC is in agreement with the assessment findings on significant effects on the receptors assessed in the Detailed Landscape Assessment in Appendix 14.4 [AS-086] and the Detailed Visual Assessment in Appendix 14.5 [AS-139].</p>
PED.1.23	<p>Applicant, All Local Authorities, Natural England, The Chiltern Society and Chilterns Conservation Board</p>	<p><b>Chilterns AONB Sensitivity Test [APP-107]</b>  <b>Applicant:</b> Paragraph 2.4.2 states that extension to the boundary of the Chilterns AONB would neither change the judgements of magnitude of impact resulting from the Proposed Development nor those on the sensitivity of a visual receptor. This is because judgements on sensitivity are a product of the activity one is performing when experiencing a view, which would not be altered by the future designation of this land.</p> <p>Please explain further the rationale for this statement, given that introducing a statutory landscape designation would likely increase the value of the receptor and its susceptibility to change.</p>	<p>The LPA is in agreement with the assessment finding. The magnitude of impact would not change should the boundary of the AONB be altered, whilst the sensitivity of the visual receptor will remain the same despite the change in designation.</p>

		<b>All Local Authorities, Natural England, The Chiltern Society and Chilterns Conservation Board:</b> Are parties in agreement with the findings in the Sensitivity Assessment? If not, why not?	
PED.1.32	All Local Authorities	<p><b>Landscape and the planning balance</b></p> <p>Chapter 8 of the Planning Statement [AS-122, paragraph 8.9.32] concludes that, allowing for mitigation measures, landscape and visual impacts should be accorded only limited weight in the planning balance.</p> <p>Do you agree that landscape and visual impacts should only be accorded limited weight? If not, why not and what weight should they be given?</p>	The LPA considered the proposed development against the landscape and character of the area around the airport and whilst the proposal will result in some harm (such as the loss of an area of local landscape value), the proposed development includes creation of new landscaped areas and habitats, with management through the Strategic Landscape Masterplan (APP-172) and the Outline Landscape and Biodiversity Management Plan (AS-029). Consequently the LPA considers it appropriate to only accord limited weight to the landscape and visual impacts.

## 11 Socio-economic effects

### Social effects

SE.1.1	Applicant and Joint Host Authorities	<p><b>Equity</b></p> <p>The New Economics Foundation [REP1-114, paragraphs 75 to 79] have highlighted that key impacts of the scheme have not been assessed through an equity lens. Why has this assessment not been undertaken and given the emphasis that has been placed on how the</p>	The importance of the airport within the local economy, as a driver of economic growth and as a key asset that will help the local area recover from the impact of the Covid-19 pandemic is highlighted in
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		<p>Proposed Development would contribute to delivering the levelling up agenda should it be and, if not, why not?</p>	<p>the Need case at paragraphs 2.4.23 to 2.4.30.</p> <p>Para 2.4.25 of the Needs case points to Luton Council setting up the Luton Inclusive Growth Commission in late 2018 as an independent body tasked with investigating how to develop an inclusive economy in Luton and to overcome specific barriers to inclusive growth. The Commission highlighted poverty and inequality as being among the most important issues in Luton.</p> <p>The Luton 2020-2040 Inclusive Economy Strategy that followed notes that the airport is a major asset to Luton and its local economy and that securing the airport's recovery and growth in line with what is being proposed will help to support further economic growth and deliver new jobs for local people.</p> <p>Para 2.4.30 of the Need Case points to the work to deliver Luton Council's Inclusive Economy Strategy, the importance of growing the economy to provide more high-value and well-paid jobs for local residents and driving growth in key sectors and at the airport. It points to the airport being one of the key economic strengths of the area in</p>
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			<p>terms of supporting recovery post Covid-19 pandemic.</p> <p>However, airports and the jobs they support provide a range of jobs across skill levels, and providing a balance of high and lower paid roles is as important in the delivery of any inclusive growth strategy as is the objective of emphasizing the importance of high value jobs. The jobs growth projected as a result of the airport's growth will provide this balance of job roles and opportunities. The Needs case could perhaps draw this balance argument out a little more than it does.</p>
<b>Economic effects</b>			
SE.1.4	Applicant and Luton Borough Council	<p><b>Employment and training strategies</b></p> <p>The s106 agreement attached to the current planning consent for the airport requires the delivery of an employment, skills and recruitment plan:</p> <ol style="list-style-type: none"> <li>1. Under the s106 agreement annual monitoring of this plan should have occurred. Can you provide details of what outcomes has it delivered since the granting of consent?</li> <li>2. What would happen to this strategy given Articles 44 and 45 in the draft DCO [REP2-003] ie would it be in</li> </ol>	<p>Annual reporting on the “effectiveness” of the Employment Skills and Recruitment Plan (ESRP) has been embedded into the annual reporting cycle of the airport operator (LLAOL). A summary of employment statistic is contained in LLAOL’s Annual Monitoring Reports.</p> <p>1. A summary of the number of jobs in the various sectors at the airport is provided in Appendix 2 to this document.</p>

		<p>addition to or replaced by the proposed Employment and Training Strategy (ETS)?</p> <ol style="list-style-type: none"> <li>3. The Green Horizons Park s106 requires the delivery of an employment, skills, procurement and training strategy. Would the ETS be in addition to or replace this strategy?</li> <li>4. Given what the ETS is delivering should it be secured through a requirement rather than a s106 agreement as has been done on other DCOs? If not, why not, and what is the advantage of securing it through a s106 as opposed to a requirement?</li> </ol>	<p>In addition LLAOL Sustainability Reports provide more detail in relation to the recruitment activities undertaken by the airport operator, including detail on approaches to recruitment. A summary of the various activities carried out by LLAOL, together with information from the most recent Sustainability Reports in terms of recruitment activities is also provided within Appendix 2.</p> <ol style="list-style-type: none"> <li>2. Article 44 is the interaction with the LLAOL 18mppa and Article 45 sees planning permissions falling away if the DCO is granted. LBC would expect that the proposed Employment and Training Strategy (ETS) would replace the existing ESRP. It is anticipated that this would be secured through the S106 agreement.</li> <li>3. LBC has met with the Applicant in order to better understand the relationship between the extant New Century Park (Green Horizons Park) planning permission and association S106 agreement. The Applicant envisages that the ETS would be in addition to the strategy associated with Green Horizons Park, though this is to be</li> </ol>
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			<p>discussed further as the S106 is progressed.</p> <p>4. LBC has historically secured the employment training and skills plans through legal agreements and understands that this is also not uncommon with other DCOs. There are advantages of securing it through a S106 as this provides greater flexibility for review and updating, rather than through what could be a more lengthy and complicated process to amend a requirement..</p>
SE.1.10	Applicant and Joint Host Authorities	<p><b>Monitoring</b> The ES [APP-037, paragraph 11.13.1] concludes that there would be no requirement for continued monitoring during construction or operation of the Proposed Development.</p> <p><b>Applicant:</b> Provide further detail as to how this conclusion was reached.</p> <p><b>Joint Host Authorities:</b> Should economic and employment effects during construction/operation be monitored? If so why and how should this be secured?</p>	<p>Monitoring of jobs growth, access to jobs by local residents would seem to be an important part of monitoring the socio-economic impact of the growth of the airport on the local economy over time.</p> <p>It is noted for example, that the average earnings of the 3,100 airport jobs taken by workers within the Luton area have an average worker wage of c. £26,200 (2019). This is well below the average airport wage of £41,100 (page 17 of Oxford Economics' report), which suggests Luton workers are not accessing the higher paid jobs at the airport. This suggests that it would be highly beneficial for the proposals to be</p>

			<p>linked closely to a robust Skills and Employment plan that can raise skill levels over time for Luton area airport workers to help them access the higher value jobs at the airport.</p> <p>If periodic monitoring is not undertaken, then it will be very difficult to track how and whether jobs and skills benefits for local people can improve over time as the airport grows.</p> <p>It is anticipated that the proposed Employment and Training Strategy would be secured through the S106 agreement.</p>
SE.1.12	Applicant and Luton Borough Council	<p><b>International connections</b></p> <p>The Planning Statement [AS-122, paragraph 2.5.1] states that there are a large number of businesses with international connections in the area served by the airport and these businesses need enhanced aviation connectivity in order to remain globally competitive, and to deliver growth in productivity and output. Please provide the evidence behind this statement, including details of the companies you refer to.</p>	<p>In 2019, the year at which the airport operated at 18mppa, some 141 destinations were served across 41 different countries.<sup>1</sup> The table in Appendix 2 of this document provides details of the number of employees in the various sectors operating at the airport.</p> <p>There are eight airlines that regularly operate from Luton. The three largest, accounting for 92% of movements in 2019, are easyJet, Wizz and Ryanair. EasyJet is based at Luton and operates</p>

<sup>1</sup> Annual Monitoring Report 2019 via <https://www.london-luton.co.uk/LondonLuton/files/e3/e3474dde-5dce-4980-8bc2-81c5e683c5fe.pdf>

			<p>from Hangar 89 which can accommodate three aircraft and 1,000 employees. TUI, one of the world's leading tourism groups is headquartered in Luton, with employees providing a wide variety of aviation services, including: airline operations, finance, data science, human resources and marketing as well as engineering and maintenance services for the company's aircraft. The other regular airlines that operate from Luton include: Blue Air, DHL, TUI, Vueling and EI AI.</p> <p>In addition to the commercial passenger airlines, there are a number of business jet Fixed Base Operators (FBOs) located at the airport, including Signature Flight Support, Harrods Aviation and RSS Jet Centre. These FBOs provide services for aircraft, including fuel, parking and hangar space, as well as services for passengers such as immigration, security and customs services to handle private international flights.</p> <p>Other companies that are directly related to servicing the commercial passenger carriers and needing to be based at the airport include those involved with amongst other things: ground handling services (namely Swissport, GH London</p>
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			<p>and Menzies); catering (e.g. Gate Gourmet and High Flying Food); flight services (e.g. OAG aviation providing flight data); aviation security and logistics (e.g. Wilson James); and maintenance contractors (e.g. Ryebridge).</p> <p>Luton airport is attractive not just to companies involved with commercial passenger carriers and business aviation, but also to aviation related supply chain businesses including tier 1 aerospace business GKN aerospace. Additionally, Luton is increasingly attracting non-aviation related businesses from food manufacturing, logistics, Ai and technology sectors who generally see enhanced connectivity as crucial to their business operations as it supports increased collaboration and productivity which in turn helps them to be globally competitive.</p> <p>The Council's Skills and Employability Team liaises with companies located in Luton and considering setting up in the town and notes that, in the last few years multiple businesses that have moved to Luton have cited the airport and its connectivity to the rest of the world as one of their main reasons for locating or starting up in Luton. The unit has</p>
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			<p>collated statements from various companies referencing such factors as the 'unmatched connectivity to both London and Europe', the town's role as a 'hub for aviation innovation and growth' and its 'strategic location' with transport connectivity from the airport to the rail and road network. The quotes and statements were provided for a different purpose and authority has not been given permission for their use in connection with the DCO. However, some of the companies that have commented to this effect are listed below:</p> <ul style="list-style-type: none"> <li>• TUI, Wigmore House, Wigmore Pl, Wigmore Ln, Luton LU2 9TN</li> <li>• GKN Aerospace Services Limited, London Luton Airport, Luton, Bedfordshire LU2 9PQ</li> <li>• easyJet, Hangar 89, Bedfordshire, Luton LU2 9PF</li> <li>• Wizz Air, Main Terminal Building, London Luton Airport, LU2 9LY</li> <li>• Ryanair, Main Terminal Building, London Luton Airport, LU2 9LY</li> <li>• Avion Flight Training Centre, Hanger 26 Percival Way, Luton LU2 9PA</li> <li>• Harrods Aviation, President Way London Luton Airport LU2 9NW</li> <li>• Signature Aviation, Percival Way, Luton LU2 9PA</li> </ul>
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			<ul style="list-style-type: none"> <li>• OAG Aviation, 1 Capability Grn, Luton LU1 3LU</li> <li>• I3 Simulation, Unit 10 Finway, Dallow Rd, Luton LU1 1TR</li> <li>• Merge XR, Studio 10, Finway, Dallow Rd, Luton LU1 1TR</li> <li>• Pooja Studios, Dallow Rd, Luton LU1 1UR</li> <li>• AMX Support UK Limited, London Luton Airport - Terminal 2 Signature Flight Support, Britannia House, Frank Lester Way, Luton, LU2 9NQ.</li> <li>• Jaltek, Sundon Business Park, Unit 13 Dencora Way, Luton LU3 3HP</li> <li>• Leonardo, 300 Capability Green, Luton LU1 3PG</li> </ul>
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## 12 Health and community effects

HAC.1.3	Applicant and Joint Host Authorities	<p><b>Joint Strategic Needs Assessment (JSNA)</b></p> <p>The ExA requests that the Applicant and the Joint Host Authorities meet to agree any specific datasets relating to local health inequalities within the JSNA document(s) relevant to the Proposed Development that are necessary to ensure that the assessment, receptor selection and any consequent mitigation is representative of the likely significant effects. The Health and Community chapter should be updated accordingly, where possible by Deadline 4 and no later than Deadline 5.</p>	A meeting has been arranged between the Applicant and the Host Authorities
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HAC.1.9	Applicant and Luton Borough Council	<p><b>Assessment – Receptors</b></p> <p>Provide an update on ongoing discussions regarding effects of asylum seekers on local housing market assessment assumptions.</p>	<p>Since the initial comment was raised in August 2023 in LBC’s LIR (REP1A-004 paragraph 4.11.11), the Council has been in regular dialogue with the Home Office about the local position which is well understood in terms of impact.</p> <p>It is therefore envisaged that the local footprint will continue to reduce over the coming months, which is in line with regional planning approaches as overseen by the East of England Local Government Association Strategic Migration Partnership.</p> <p>In addition, the Council is seeing accelerated decisions from the Home Office, leading to a number of asylum seekers either having positive or negative decisions and leaving these hotels/establishments. This will mean that less of this cohort will be accommodated in these properties but there will be some impact on the borough, where some of the households with positive decisions will be accommodated by the Housing Service, if these households have a housing priority and the Council owes them a housing duty. Inevitably, not all of these households will be accommodated by</p>
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			<p>the Council and some of these households will be dispersed to other areas outside of Luton. The impact at this time is not considered to be significant. Whilst it is also not anticipated that the workforce associated with the Proposed Development will have a significant affect upon the local housing market.</p>
HAC.1.15	Joint Host Authorities	<p><b>Need for requirements in relation to health and wellbeing</b>  The Joint Host Authorities' LIR [REP1A-003, paragraphs 7.8.7 to 7.8.9] concludes that the Proposed Development would create adverse health and wellbeing effects on residents during operation and recommends that additional requirements should be included in the draft DCO to mitigate this negative impact. Please provide further detail of the requirements that should be included, including any preferred drafting.</p>	<p>Whilst the ExA requests comments from the Joint Host Authorities, it should be noted that the Local Impact Report referred to here (REP1A-003) was prepared by the three Hertfordshire Authorities and did not represent the views of all five Host Authorities. LBC therefore does not propose to comment on this matter.</p>

# Appendices

## Appendix 1: Citations for District and County Wildlife Sites within Luton

### County Wildlife Sites - Citations

Site name: **Honeygate and Crick Hills CWS**

Status(es): County Wildlife Site

Gridref: TL094234

Area: 4.83 hectares

Council(s): Luton Borough

History:  
03/04/2001 CWS recognized

CWS recognized for: Calcareous scrub and grassland  
Hedgerows  
Mature trees

Main habitats present:  
UK BAP Priority Calcareous Grassland (Broad habitat)

Other habitat(s) Scrub  
Hedgerows  
Mature trees

Site name: **Kidney and Bull Woods CWS**

Status(es): County Wildlife Site

Gridref: TL097192

Area: 40.3 hectares

Council(s): Central Bedfordshire

History:  
1990 CWS recognized

CWS recognized for: Ancient semi-natural woodland  
Trailing tormentil

Main habitats present:  
UK BAP Priority Lowland mixed deciduous woodland

Other habitat(s) Conifer plantation  
Mixed plantation  
Neutral grassland  
Marshy grassland  
Bracken

Site name: **River Lea CWS**

Status(es): County Wildlife Site

Gridref: TL02

Area: 36.63 hectares

Council(s): Central Bedfordshire  
Luton Borough

History:

1990	CWS recognized
9/1998	Cat's Brook and Houghton Brook added to the CWS
11/2007	Scrapes near Cat's Brook and downstream riverside trees and hedges confirmed within the CWS
17/01/2013	Lewsey brook added. Boundary of CWS defined over entire length of River Lea and its headwaters, within Luton.

CWS recognized for: River  
Adjacent habitats and features considered part of the river system  
Population of Water Voles

Main habitats present:

UK BAP Priority	River Fen, Marsh and Swamp (Broad habitat)
Other habitat(s)	Neutral grassland Scrub Hedgerows Trees

Site name: **Riverside Walk CWS**

Status(es): County Wildlife Site

Gridref: TL088235

Area: 7.0 hectares

Council(s): Luton Borough

History:

9/1998	CWS recognized
10/2005	Two areas of Stewardship grassland added to the CWS

CWS recognized for: Habitat mosaic containing ruderal vegetation, mature trees, secondary woodland, scrub, swamp and open water  
Willow pollards

Main habitats present:

UK BAP Priority	River Traditional orchard Lowland meadow
Other habitat(s)	Mature trees Neutral grassland Scrub Broadleaved and conifer plantation

Swamp  
Open water  
Hedges

Site name: **Slaughter's Wood and Green Lane CWS**

Status(es): County Wildlife Site

Gridref: TL11952285

Area: 5.3 hectares

Council(s): Luton Borough

History:  
1990 CWS recognized  
9/1998 CWS boundary updated to include Green Lane

CWS recognized for: Ancient semi-natural woodland  
Hedgerow  
Historical importance

Main habitats present:  
UK BAP Priority Lowland mixed deciduous woodland  
Hedgerows

Other habitat(s) Bracken  
Scrub  
Neutral Grassland  
Green Lane

Site name: **Stockwood Park CWS**

Status(es): County Wildlife Site

Gridref: TL083194

Area: 54.90 hectares

Council(s): Luton Borough

History:  
9/1998 CWS recognized  
03/04/2013 CWS extended

CWS recognized for: Habitat mosaic of sem-improved grassland, biologically-significant trees, mature trees, woodland, scrub, hedgerows, pond.

Main habitats present:  
UK BAP Priority Wood-pasture & parkland  
Lowland meadow

Other habitat(s) Neutral , calcareous and acidic grassland  
Scrub  
Ponds  
Biologically significant trees  
Mature trees  
Hedgerows

Site name: **The Chase CWS**

Status(es): County Wildlife Site

Gridref: TL100232

Area: 4.84 hectares

Council(s): Luton Borough

History:

09/1998	CWS recognized
04/10/2005	CWS boundary updated to include area of grassland south of existing CWS
08/03/2023	Boundary adjusted to fit around new road layout (small section added, other small section removed)

CWS recognized for: Old hedgelines & hedgebanks  
Broadleaved woodland  
Neutral Grassland

Main habitats present:

UK BAP Priority	Broadleaved, Mixed and Yew Woodland (Broad Habitat)
Other habitat(s)	Neutral grassland Mature trees Scrub

Site name: **Wigmore Park CWS**

Status(es): County Wildlife Site

Gridref: TL126216

Area: 15.41 hectares

Council(s): Luton Borough

History:

09/1998	CWS recognized
16/11/2009	The hedgerow alongside the NE section of green lane was added to the CWS

CWS recognized for: Neutral grassland  
Calcareous grassland  
Hedgerows

Main habitats present:

UK BAP Priority	Neutral Grassland (Broad Habitat) Calcareous Grassland (Broad Habitat) Hedgerows
Other habitat(s)	Scrub Green Lane Pond Tall ruderal vegetation

Site name: **Winch Hill Wood CWS**

Status(es): County Wildlife Site

Gridref: TL135213

Area: 1.9 hectares

Council(s): Luton Borough

History:  
20/07/2006 CWS recognized

CWS recognized for: Ancient semi-natural broadleaved woodland  
Hedgerow

Main habitats present:  
UK BAP Priority Lowland mixed deciduous woodland  
Hedgerows

Other habitat(s) Scrub  
Open bracken dominated areas

## District Wildlife Sites - Citations

Site name: **Dairyborn Scarp DWS**

Status(es): District Wildlife Site

Gridref: TL111211

Area: 6.56 hectares

Council(s): Luton Borough

History:  
17/01/2013 DWS recognized

DWS recognized for: Habitat mosaic  
Scrub

Main habitats present:  
UK BAP Priority

Other habitat(s) Scrub  
Neutral grassland  
Open mosaic habitats

Site name: **Luton Parkway Verges DWS**

Status(es): District Wildlife Site

Gridref: TL106202

Area: 0.36 hectares

Council(s): Luton Borough

History:  
03/04/2013 DWS recognized

DWS recognized for: Calcareous grassland  
Neutral grassland

Main habitats present:  
UK BAP Priority

Other habitat(s) Calcareous grassland

Site name: **River Lea DWS**

Status(es): District Wildlife Site

Gridref: TL0822

Area: 34.36 hectares

Council(s): Luton Borough

History:  
03/04/2013 DWS recognized

DWS recognized for: Undeveloped floodplain

Main habitats present:  
UK BAP Priority

Other habitat(s) Neutral grassland  
Scrub  
Trees  
Allotments

Hedgerows Neutral grassland

Site name: **Vauxhall Way DWS**

Status(es): District Wildlife Site

Gridref: TL106225

Area: 2.90 hectares

Council(s): Luton Borough

History:  
30/11/2020 DWS recognized

DWS recognized for: Hedgerows  
Habitat Mosaic

Main habitats present:  
UK BAP Priority Hedgerows

Other habitat(s) Neutral grassland  
Woodland



## Appendix 2: Employment Numbers at Luton Airport

	AMR 2012	AMR 2013	AMR 2014	AMR 2015	AMR 2016	AMR 2017	AMR 2018	AMR 2019	AMR 2020	AMR 2021	AMR 2022
<b>Standard Industrial Classification 2007, Section Names</b>											
Accommodation and Food Service Activities	400	400	500	Missing	500	1,000	500	500	500	500	400
Administrative and Support Service Activities	1,800	1,800	1,800		1,300	2,100	2,800	2,600	3,200	2,700	3,200
Financial and Insurance Activities	<100	<100	<100		<100	<100	<100	<100	<100	<100	<100
Manufacturing	1,300	1,400	1,400		1,100	1,200	1,100	800	700	600	600
Professional, Scientific and Technical Activities	<100	<100	<100		<100	<100	<100	<100	<100	<100	<100
Public Administration & Defence; Compulsory Social Security	<100	<100	<100		<100	<100	<100	300	300	300	300
Real Estate Activities	<100	<100	<100		<100	<100	<100	<100	<100	<100	<100
Transportation and Storage	3,800	4,400	4,400		5,700	5,300	5,000	5,500	6,300	6,100	6,300
Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	600	300	100		400	400	600	700	400	300	200
<b>Grand Total</b>	<b>8,200</b>	<b>8,400</b>	<b>8,500</b>		<b>9,300</b>	<b>10,200</b>	<b>10,400</b>	<b>11,200</b>	<b>11,200</b>	<b>10,600</b>	<b>11,100</b>

\* \* \* \* \*

Original Application      PP 12/01400/FUL      PP 15/00950/VARCON      Covid 19 Pandemic

The airport operator (LLAOL) reports on employment, skills and training in their Sustainability Reports.


LLAOL runs a community skills programme, working with local schools to provide career training, developing students' communication and problem solving skills, showcasing opportunities within aviation and engineering. Typically LLAOL provides ten school visits every year (though this was curtailed during the Pandemic). The airport operator's 'Connect' programme helps equip young people to transition from education to the workplace, LLAOL also run an apprenticeship scheme, whilst LLAOL's 'Get into Airports' programme for 18-30 year olds, run in partnership with the Prince's Trust supports those starting a career in aviation.

The Get into Airports programme includes four weeks of classroom based modules and hands on work experience across seven departments (including the Airport Rescue and Fire Service, Airside Operations, IT, HR, and Guest Experience), together with partner companies based at the airport, including Signature, easyJet and Wilson James.

LLAOL runs jobs fairs in collaboration with LBC. Thus for instance, in November 2021 the airport's jobs fair was supported by more than 20 local companies, advertising over 1,000 jobs, with more than 600 people attending the event.

The list below is a summary of various activities that have been carried out by the airport operator (LLAOL).

- Advertising - LLAOL provide all internal roles to LBC and Luton Rising for advertisement on their websites. Security entry level roles are also supplied to Connect2Luton and the Department for Work and Pensions both of which are allocated spaces at recruitment events. Job fairs/events are all held within Luton. The Luton Jobcentre has an aviation desk to further promote roles at the airport. 57% of all new recruits (that are still employed as of 26/10/23) are from the LU1-7 postcodes.
- Advertising – As well as digital means of advertising (including Luton Rising and LBC websites) when LLAOL recruit high volume roles, newspaper advertising is used – July-Sept 2022 saw a local recruitment advertising campaign, via local radio, social media channels (Instagram and Facebook) and local newspapers.
- Advertising – As well as the schemes mentioned above, LLAOL also advertise all known third party jobs on the LLAOL website, and LBC and Luton Rising get all internal LLAOL job ads before they go further externally. Hyperlink to the airport's Job Vacancies site: [Job Vacancies at London Luton Airport \(london-luton.co.uk\)](https://www.london-luton.co.uk) .
- Promoting accessibility – Travel discounts for employees are available and continually promoted via the airport's website - <https://www.london-luton.co.uk/corporate/careers/staff-discount-travelcard>
- Training/monitoring - LLAOL track the induction process for all new employees, and then all compliance training is logged, as well as mandatory training within operational roles. Learning and development training for all existing employees (EDI/leadership/development/core skills) is tracked and monitored.
- Work experience – four so far in 2023 ranging from HR to Guest Experience.

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- Publishing LLAOL employee stories – Through the use of LLAOL internal newsletter, employee’s achievements, experiences and career stories are actively promoted. Also report on LU1-7 representation within the LLAOL workforce. LLAOL also display employee testimonials and career stories on the updated careers page. [Airport Careers | Corporate Site | London Luton Airport \(london-luton.co.uk\)](#).
  - Encouraging LLAOL suppliers – LLAOL actively engage with Connect2Luton who support the airport’s concessionaires and service partners. Procurement also run exercises to encourage local suppliers to engage with LLAOL processes.
  - School visits and career presentations – 19 completed since beginning of 2019 (none in 2020 due to the Pandemic) - 7 to date in 2023, made up of: 4 delivered by sustainability and 3 delivered by TSD.