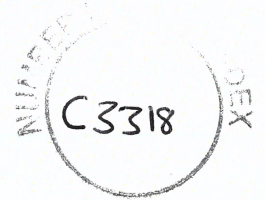




HERBERT  
SMITH  
FREEHILLS



9 December 2022

LONDON LUTON AIRPORT OPERATIONS LIMITED  
and  
LONDON LUTON AIRPORT LIMITED  
and  
NATWEST MARKETS PLC  
and  
LUTON BOROUGH COUNCIL

---

**AGREEMENT**

**Section 106 and Section 106A of the Town and  
Country Planning Act 1990 (as amended)**

**Amending and restating a Section 106  
Agreement dated 9 October 2017**

**Relating to land at London Luton Airport,  
Airport Way, Luton**

**Ref 21/00031/VARCON**

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In accordance with the Secretary of State's decision  
to grant permission and Recital M to the S106, the Carbon  
Reduction Strategy referred to in Schedule 9 has no  
effect

Herbert Smith Freehills LLP







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THIS AGREEMENT is made on the 9<sup>th</sup> day of December 2022

**BETWEEN:**

- (1) **LONDON LUTON AIRPORT OPERATIONS LIMITED** (Company Registration No. 03491213) whose registered office is at Percival House, 134 Percival Way, London Luton Airport, Luton, LU2 9NU ("**the Operator**"); and
  - (2) **LONDON LUTON AIRPORT LIMITED** (Company Registration No. 02020381) whose registered office is at Hart House Business Centre, Kimpton Road, Luton, LU2 0LA ("**the Owner**"); and
  - (3) **NATWEST MARKETS PLC** (Company Registration No. SC090312) whose registered office is at 36 St Andrew Square, Edinburgh EH2 2YB and whose address for service in England and Wales is Syndicated Loans Agency, The Royal Bank of Scotland plc, Level 5, 135 Bishopsgate, London EC2M 3UR<sup>1</sup> ("**the Mortgagee**"); and
  - (4) **LUTON BOROUGH COUNCIL** of Town Hall, Luton LU1 2BQ ("**the Council**").
- (together, the "**Parties**" and each one a "**Party**")

**RECITALS**

- (A) The Council is the Local Planning Authority pursuant to the Act and the Local Highway Authority under the Highways Act 1980 for the Borough of Luton.
- (B) The Operator is the lessee of the Land under leases dated 20 August 1998 and 25 February 1999 between the Owner, the Council (not as local planning authority) and the Operator each for a term of 30 years from 20 August 1998 and these leasehold interests are registered at HM Land Registry under title numbers BD206048 and BD216008 respectively and subject to a charge in favour of the Mortgagee.
- (C) The Owner is the freehold owner of the Land and this freehold interest is registered at the Land Registry under title numbers BD180578 and BD200841.
- (D) On 23 June 2014, the Council granted planning permission under ref: 12/01400/FUL for a full planning application for dualling of airport way/airport approach road and associated junction improvements, extensions and alterations to the terminal buildings, erection of new departures/arrivals pier and walkway, erection of a pedestrian link building from the short-stay car park to the terminal, extensions and alterations to the mid-term and long-term car parks, construction of a new parallel taxiway, extensions to the existing taxiway parallel to the runway, extensions to existing aircraft parking aprons, improvements to ancillary infrastructure including access and drainage, and demolition of existing structures and enabling works and outline planning application for the construction of a multi-storey car park and pedestrian link building (all matters reserved) (the "**First Planning Permission**").
- (E) On 18 June 2014 the Operator, the Council, the Owner and the Mortgagee entered into an agreement pursuant to Section 106 of the Act and other relevant powers containing covenants undertakings and obligations relating to the Land and the development to be undertaken pursuant to the First Planning Permission (the "**First S106 Agreement**").
- (F) On 13 October 2017, the Council granted planning permission under ref: 15/00950/VARCON pursuant to section 73 of the Act to vary condition 11(i) of the First Planning Permission (the "**Second Planning Permission**").
- (G) On 9 October 2017, the Operator, the Council, the Owner and the Mortgagee entered into an agreement pursuant to Section 106 of the 1990 Act and other relevant powers to provide that the terms of the First S106 Agreement continued to apply, with amendments, to the Second Planning Permission (the "**Second S106 Agreement**").
- (H) The Operator has now made an application under reference 21/00031/VARCON pursuant to section 73 of the Act to vary conditions 8 (passenger throughput cap), 10 (noise contours), 22 (car parking management), 24 (travel plan) and 28 (approved plans and



documents) of the Second Planning Permission (the "**Section 73 Application**") (with any planning permission granted pursuant to the Section 73 Application being a "**Section 73 Planning Permission**").

- (I) The Council has resolved to grant permission pursuant to the Section 73 Application subject to ensuring that the terms of the Second S106 Agreement shall continue to apply, with amendment, to the Section 73 Permission.
- (J) The Secretary of State for Levelling Up, Housing and Communities by a letter dated 6 April 2022 to the Council called in the Section 73 Application and on 11 May 2022 the Secretary of State for Transport confirmed that the Section 73 Application would be determined jointly by the two Secretaries of State, who would decide whether the Section 73 Planning Permission should be granted following a public inquiry, held commencing on 27 September 2022.
- (K) The Parties have agreed that the Second S106 Agreement shall be amended and restated in accordance with this Agreement as set out in the Appendix to this Agreement (the "**Restated Section 106 Agreement**").
- (L) The Council confirms that the contributions payable to date pursuant to the First Section 106 Agreement and the Second S106 Agreement have been paid and used for the purposes designated in those agreements and within the specified timeframe and for the avoidance of doubt the Council is entitled to retain those contributions as set out in the First Section 106 Agreement and the Second Section 106 Agreement. Obligations in the First Section 106 Agreement and the Second Section 106 Agreement which have been fully complied with are not provided for in the Appendix to this Agreement.
- (M) If any of the Operator's covenants with the Council as set out in Schedules 1-8 of the Restated Section 106 Agreement are found by the Secretaries of State (or by the Inspector appointed by the Secretaries of State) not to comply with regulation 122 of the Community Infrastructure Levy Regulations 2010, or it is stated in the Secretaries of State's decision that no weight should be attached to any such obligation (or any part of an obligation), then the relevant obligation shall immediately (without any further act by the Parties) be cancelled and of no effect to the extent determined by the Secretaries of State in their decision and the Operator shall be under no obligation to comply with the relevant obligation, but such cancellation shall not affect the validity or enforceability of the remaining parts of this Agreement.

**NOW THIS DEED WITNESSES** as follows:



1. **INTERPRETATION**

- 1.1 Words importing the singular shall include the plural and vice versa.
- 1.2 Words importing one gender include all other genders.
- 1.3 Clause headings (if any) are inserted for convenience only and shall not affect the construction of this Agreement and all references to clauses and sub- clauses are to clauses and sub-clauses of this Agreement.
- 1.4 References to statutes or statutory instruments include references to any modification extension or re-enactment of them from time to time.
- 1.5 References in this Agreement to the Council shall include any successor to its statutory functions.
- 1.6 Reference in this Agreement to "Secretaries of State" shall mean the Secretary of State for Levelling Up, Housing and Communities and the Secretary of State for Transport.
- 1.7 Reference in this Agreement to "Implement" means the carrying out of a material operation as defined in Section 56 of the Town and Country Planning Act 1990.

2. **STATUTORY POWER AND ENFORCING AUTHORITY**

This Agreement is made as a deed pursuant to Section 106 and 106A of the Act and Section 111 of the Local Government Act 1972 and the obligations contained within the Restated Section 106 Agreement are planning obligations and covenants binding on the Land for the purposes of those statutory provisions and are enforceable by the Council.

3. **COMMENCEMENT**

- 3.1 Subject to clauses 4 and 5, this Agreement takes effect on the date of grant of the Section 73 Planning Permission.
- 3.2 In the event that the Council shall at any time hereafter grant a planning permission pursuant to an application made under Section 73 of the Act (or any re-enactment or replacement therefor) in respect of the conditions in the Section 73 Planning Permission (and for no other purpose whatsoever) references in this Agreement to the Section 73 Application and the Section 73 Planning Permission and the Development shall be deemed to include any such application and any planning permission granted pursuant to such application, and the resultant development respectively as aforesaid and this Agreement shall henceforth take effect and be read and construed accordingly Provided That the Council does not deem it necessary to grant the said permission subject to a new agreement under Section 106 of the Act.

4. **IMPLEMENTATION OF THE SECTION 73 PLANNING PERMISSION**

- 4.1 The Operator covenants to serve a notice on the Council of its intention to Implement the Section 73 Planning Permission (the "**Notice of Implementation**") at the point when it wishes to Implement the Section 73 Permission.
- 4.2 The Notice of Implementation shall be sent by email to the Monitoring Officer to [developmentcontrol@luton.gov.uk](mailto:developmentcontrol@luton.gov.uk) and the said notice shall include the reference number "S.106/21/00031/VARCON".

5. **AMENDMENT RESTATEMENT AND CONTINUATION**

- 5.1 The Parties agree that with effect from the date of the Notice of Implementation the Second S106 Agreement shall be amended and restated so that it reads as if it were restated in the form set out in the Appendix and so that the rights and obligations of the parties to this Agreement under the Second S106 Agreement shall, from the date of the Notice of



Implementation, be governed by and construed in accordance with the terms of the Restated Section 106 Agreement.

- 5.2 The Parties hereby agree that reference in the Appendix to the term "Implementation Date" shall mean the date of the Notice of Implementation.

## 6. **LEGAL EFFECT**

- 6.1 No person shall be liable for any breach of the covenants, undertakings and obligations contained in this Agreement to the extent that such breach relates to any part of the Land in which that person has no interest and/or which occurs after he has parted with his interest in the Land or that part of the Land in respect of which such breach occurs, other than in respect of any breach by it at the time when it held such an interest.
- 6.2 No person other than the Council, the Mortgagee, the Operator and the Owner shall have the benefit of or be capable of enforcing any term of this Agreement as a result of the Contracts (Rights of Third Parties) Act 1999.
- 6.3 All parties to this Agreement acknowledge that they are under an obligation to act reasonably and (without prejudice to the generality of that obligation) if any certificate consent permission expression of satisfaction or other approval is due from one party to another or any person on their behalf under the terms of this Agreement it shall not be unreasonably withheld or delayed.
- 6.4 Nothing in this Agreement shall fetter prejudice or affect the Council's powers to enforce any specific obligation or term or condition nor shall anything contained in this Agreement fetter prejudice or affect any provisions rights powers duties and obligations of the Council in the exercise of its functions as a local planning authority for the purposes of the Act or otherwise as a local authority.
- 6.5 No waiver (whether express or implied) by the Council of any breach or default in performing or observing any of the covenants terms or conditions of this Agreement shall constitute a continuing waiver and no such waiver shall prevent the Council from enforcing any of the relevant terms or conditions or from acting upon any subsequent breach or default.
- 6.6 If any provision in this Agreement shall in whole or in part be found (for whatever reason) to be invalid or unenforceable then such invalidity or unenforceability shall not affect the validity or enforceability of the remaining provisions of this Agreement.
- 6.7 Nothing in this Agreement shall prohibit or limit the right to develop any part of the Land in accordance with a planning permission (other than the Section 73 Permission) granted (whether or not on appeal) after the date of this Agreement.
- 6.8 If the Section 73 Planning Permission is not granted by the Secretaries of State or is quashed revoked or expires the obligations in this Agreement shall (save for clause 6 of this Agreement) cease to have effect.

## 7. **LEGAL FEES**

The Operator shall pay on completion of the Agreement the Council's reasonable legal costs of £7000.00 in connection with the negotiation and completion of this Agreement.

## 8. **LOCAL LAND CHARGE**

This Agreement is a Local Land Charge and shall be registered in the Register of Local Land Charges.

## 9. **GOVERNING LAW**

This Agreement is governed by and interpreted in accordance with the law of England and Wales and the parties submit to the exclusive jurisdiction of the courts of England and Wales.



**IN WITNESS** of which the Operator the Owner the Mortgagee and the Council have executed this Agreement as a Deed on the day and year above written.

**APPENDIX 1**  
**RESTATED AND AMENDED SECTION 106 AGREEMENT**

**1. DEFINITIONS**

1.1 In this Agreement unless expressly specified otherwise:

**"the Act"** means the Town and Country Planning Act 1990 (as amended);

**"Actual 55dB Night Contour"** means the most recently published 55 dB LAeq 8h average mode summer night-time (23h00 to 7h00) airborne noise contour based on actual aircraft movements at the Airport for the summer period (16 June to 15 September);

**"the Actual 63dB Contour"** means the most recently published 63dB LAeq 16h average mode summer daytime (07h00 to 23h00) airborne noise contour based on actual aircraft movements at the Airport for the summer period (16 June to 15 September);

**"the Airport"** means the airport situated on the Land known as London Luton Airport;

**"Airport Surface Access Strategy"** means the surface access strategy for the Airport produced (and revised and reissued from time to time) in accordance with the Department for Transport's Guidance on Airport Transport Forums and Airport Surface Access Strategies (26 July 1999) (or any replacement or modification of such guidance) and the current version of which is the London Luton Airport Surface Access Strategy 2018 – 2022 (2019 Reissue);

**"Carbon Reduction Strategy"** means a carbon reduction strategy to be submitted and updated in accordance with Schedule 4;

**"Community Fund"** means the fund established by the Operator pursuant to Schedule 6 of this Agreement and administered by an independent body under which community projects may be funded within the Local Area;

**"Construction Travel Plan"** means the action plan approved by the Council on 14 August 2015 (ref: 15/00452/DOC) which shall be aimed at increasing travel by sustainable modes of surface transport including making the best use of public transport including provision for monitoring of the plan;

**"the Daytime Ground Noise Threshold"** means a free field noise level in excess of 55dB LAeq 16h daytime (07h00 to 23h00) based on the most recently published figures for actual aircraft operations at the Airport for the summer period (16 June to 15 September);

**"Decision Letter"** means the letter issued by the Secretaries of State giving reasons for the grant of the Section 73 Planning Permission;

**"the Development"** means the development authorised by the Section 73 Planning Permission;

**"Employment Skills and Recruitment Plan"** means the plan entitled "Employment Skills and Recruitment Plan & Local Procurement Protocol" dated April 2015 which specifies the measures that will be taken by the Operator to make available to people in the Local Area opportunities to find employment and to improve their skills during the operation of the Development Provided That this shall not compromise the legislative requirements on the Operator and other businesses as employers and includes any update to the Employment Skills and Recruitment Plan from time to time approved by the Council in accordance with Schedule 5 to this Agreement;

**"Environmental Management Payment"** means the sum of £5,000 Index Linked to be spent by the Operator each year on hedgerow management of Wigmore Valley Park and areas around the perimeter fence line of the Airport

**"Essential Service Provider"** means an energy service company, statutory undertaker, services utility company or provider that shall acquire an interest in the Land for the purpose of providing the supply of electricity, gas, water, heat, power, drainage, telecommunications services or public transport services to or for the benefit of the Development (but excluding the Operator);



**"Existing Sustainability Strategy"** means the written strategy submitted to the Council on 19 February 2015 and attached at Annexure 2 of this Agreement;

**"First Planning Permission"** means the planning permission dated 23 June 2014 with reference number 12/01400/FUL for a full planning application for dualling of airport way/airport approach road and associated junction improvements, extensions and alterations to the terminal buildings, erection of new departures/arrivals pier and walkway, erection of a pedestrian link building from the short-stay car park to the terminal, extensions and alterations to the mid-term and long-term car parks, construction of a new parallel taxiway, extensions to the existing taxiway parallel to the runway, extensions to existing aircraft parking aprons, improvements to ancillary infrastructure including access and drainage, and demolition of existing structures and enabling works and outline planning application for the construction of a multi-storey car park and pedestrian link building (all matters reserved);

**"Implementation Date"** means the date of the notice served pursuant to clause 4 of the agreement to which this Agreement is an Appendix;

**"Independent Body"** means the Bedfordshire and Luton Community Foundation or any replacement independent body approved pursuant to paragraph 1(B) of Schedule 6;

**"Index Linked"** means that any sum so described in this Agreement shall be increased by an amount in proportion to the increase in the All Items Index of Retail Prices ("**RPI Index**") issued by the Office for National Statistics from the date of this Agreement until the date on which such sum is paid in accordance with the following formula:

$$X = \text{£Y} \times B/A$$

Where:

X is the sum in question after application of this formula

£Y is the sum due under this Agreement to which this formula is applied

A is the value of the RPI Index last published before the date of this Agreement;  
and

B is the value of the RPI Index last published before sum (£Y) is paid

provided that if the RPI Index shall cease to exist, there shall be substituted such other index as shall be specified by the Council acting reasonably.

**"Initial Monitoring Fund"** means the sum of £70,000 Index Linked to be paid by the Operator to the Council to be applied by the Council towards the monitoring by the Monitoring Officer of the obligations in this Agreement;

**"Interest"** means interest at 5 per annum above the base lending rate of Lloyds Bank plc from time to time;

**"the Land"** means the land known as London Luton Airport, Airport Way, Luton shown edged red on Plan 1;

**"LLACC"** means the London Luton Airport Consultative Committee;

**"Local Area"** means together the administrative areas of Luton Borough Council, Central Bedfordshire Council, North Hertfordshire District Council, Stevenage Borough Council, St Alban's City and District Council, Dacorum Borough Council and the Aylesbury Vale area of Buckinghamshire Council;

**"Local Procurement Protocol"** means the procurement procedure that forms part of the Employment Skills and Recruitment Plan through which businesses in the Local Area are given the opportunity to bid/tender for the provision of goods and services to the Development without compromising commerciality and any legislative requirements and includes any update to the Local Procurement Protocol from time to time approved by the Council in accordance with Schedule 5 to this Agreement;

**"Monitoring Officer"** means an officer of the Council who is in charge of monitoring compliance with the obligations set out in this agreement who should be contacted at



Development Control, Town Hall, George Street, Luton, Bedfordshire, LU1 2BQ or by email to [developmentcontrol@luton.gov.uk](mailto:developmentcontrol@luton.gov.uk);

**"the Night-time Ground Noise Threshold"** means a free field noise level in excess of 48dB L Aeq 8h night-time (23h00 to 07h00) based on the most recently published figures for actual aircraft operations at the Airport for the summer period (16 June to 15 September);

**"Noise Action Plan"** means the London Luton Airport Noise Action Plan 2019-2023 (Version 1) prepared in response to the Environmental Noise Directive (2002/49/EC) and in accordance with the Environmental Noise (England) Regulations 2006, as amended and revised from time to time;

**"the Noise Insulation Fund"** means a fund to be established and maintained in accordance with the terms of Schedule 1 to this Agreement and (unless otherwise agreed) administered by LLACC in order to fund the cost of the Residential Noise Insulation Scheme and the Non-Residential Noise Insulation Scheme.

**"Noise Insulation Schemes"** means the Residential Noise Insulation Scheme and the Non-Residential Noise Insulation Scheme.

**"Noise Management Plan"** means a comprehensive noise management plan as annexed at Annexure 1 of this Agreement and operated continuously by the Operator in order to minimise noise disturbance from aircraft using the Airport and which incorporates the following schemes:

- (a) the Residential Noise Insulation Scheme;
- (b) the Non-Residential Noise Insulation Scheme;
- (c) the Noise Control Scheme implemented pursuant to condition 11 of the First Planning Permission on 2 March 2015 under reference 14/01519/DOC;
- (d) the Noise Control Monitoring Scheme implemented pursuant to condition 13 of the First Planning Permission on 2 March 2015 under reference 14/01519/DOC; and
- (e) the Ground Noise Control Scheme implemented pursuant to condition 14 of the First Planning Permission on 2 March 2015 under reference 14/01519/DOC;

**"Noise Management Plan Review Dates"** means 12 months following the Implementation Date, 30 June 2025, 30 June 2027, and subsequently every five years following 30 June 2027;

**"Noise Violation Limits"** means the Noise Violation Limits for aircraft established under the conditions attached to the Section 73 Planning Permission

**"Non-Residential Buildings"** means the following types of public buildings in noise sensitive community use and any other types of public building as agreed between the Operator and the Council:

- (a) schools and colleges;
- (b) doctors' surgeries, health centres, hospitals, nursing homes, care homes;
- (c) libraries, community centres (unless only used as social clubs), meeting halls, village halls;
- (d) churches and other places of religious worship;
- (e) children's and other day centres creches and nurseries.

**"Non-Residential Noise Insulation Scheme"** means the approved scheme incorporated within the Noise Management Plan for the funding of noise insulation works by the Operator for Non-Residential Buildings which are exposed to the highest airborne noise levels by reference to at first the forecast 2023 noise contour as specified in the Section 73 Application fixed for a period of five years from that year (i.e. until 31 December 2028), following which the eligibility will revert to the most recently published average mode



summer daytime (07h00 to 23h00) airborne noise contours or the average mode summer night-time (23h00 to 7h00) airborne noise contours based on actual aircraft movements at the Airport for the summer period (16 June to 15 September). Such Non-Residential Buildings may be situated in any part of the Local Area. The Non-Residential Noise Insulation Scheme shall incorporate the following:

- (a) The eligibility criteria for Non-Residential Buildings;
- (b) Any restrictions on the number of applications for funding which may be made under the Non-Residential Noise Insulation Scheme;
- (c) A description including the range and specification of the works which may be funded by the Non-Residential Noise Insulation Scheme and how (if at all) these will vary according to which of the eligibility criteria are met;
- (d) Any exclusions from the eligibility criteria which may for the avoidance of doubt include buildings where the range or specification of works which may be funded by the Non-Residential Noise Insulation Scheme are already met by the condition of the existing building fabric;
- (e) Details of how the Non-Residential Noise Insulation Scheme is to be administered by LLACC including:
  - (i) the address to which applications are to be made;
  - (ii) the process by which it will be established whether the eligibility criteria for Non-Residential Buildings are met;
  - (iii) independent assessment of applications;
  - (iv) the timetable for processing applications; and
  - (v) the maximum amount and timing of payments.
- (f) Measures to publicise the Non-Residential Noise Insulation Scheme and the eligibility criteria.

**"Non-Residential Noise Insulation Scheme Review Dates"** means 30 June 2025 and subsequently every five years from 30 June 2025;

**"Notice of Implementation"** means the notice of intention to implement the planning permission to be served on the Monitoring Officer;

**"Occupation"** means occupation or the bringing into use of the Development for the purposes permitted by the Section 73 Planning Permission and the words "Occupy" and "Occupied" shall be construed accordingly.

**"the Operator"** means the first named party to this Agreement; London Luton Airport Operations Limited which is the operator of the Airport and shall include any person or persons deriving title to the Land from the Operator.

**"the Operator Lease"** means together the leases of the Airport referred to in recital (B) under which the Operator is the lessee.

**"Outline Carbon Reduction Plan"** means the outline carbon reduction plan prepared by Wood dated May 2021 (Doc Ref. 41431RS28V5) submitted in support of the Section 73 Application and attached at Annexure 4;

**"the Owner"** means the second named party to this Agreement; London Luton Airport Limited and shall include any person or persons deriving title to the Land from the Owner.

**"Phasing Scheme"** means the phasing scheme submitted and approved pursuant to the Section 73 Planning Permission identifying amongst other things the timescale for commencement of the final phase (being phase 3) of the Development;

**"Plan 1"** means the plan attached hereto and numbered "1".

**"Plan 2"** means the plan attached hereto and numbered "2".

**"Plan 3"** means the plan attached hereto and numbered "3".



**"Predicted Road Traffic Noise increase"** means a predicted road traffic noise increase of not less than 1 dB as a result of the Development which for the avoidance of doubt has been identified in the First Planning Permission along the roads coloured blue on Plan 2.

**"Quarterly Flight Operations Report"** means a report which the Operator is required to publish and submit to the Council pursuant to Schedule 7 of this Agreement and which shall report on a quarterly basis each year on the environmental information specified in Schedule 7 for the preceding quarter;

**"Quota Count System"** means the quota count system for the Airport established under the conditions attached to the Second Planning Permission;

**"the Residential Eligibility Criteria"** means at first the forecast 2023 noise contour as specified in the Section 73 Application fixed for a period of five years from that year (i.e. until 31 December 2028), following which the eligibility will revert to actual aircraft movements at the Airport for the summer period (16<sup>th</sup> June to 15<sup>th</sup> September) in the immediately preceding calendar year, which will be determined on an annual basis in accordance with the following criteria:

- (a) Airborne Aircraft Noise
  - (i) Any habitable rooms at dwellings within the Actual 63dB Contour; or
  - (ii) Any habitable rooms which are used as bedrooms at dwellings within the Actual 55dB Night Contour; or
  - (iii) Any habitable rooms which are used as bedrooms at dwellings where the airborne noise level in excess of 90 dB SEL occurs externally at an annual average frequency of once or greater during the night-time (23h00 to 07h00).
- (b) Ground Noise
  - (i) Any habitable rooms at dwellings which are exposed externally to the Daytime Ground Noise Threshold; or
  - (ii) Any habitable rooms which are used as bedrooms at dwellings which are exposed externally to the Night-time Ground Noise Threshold.
- (c) Traffic Noise
  - (i) Any habitable rooms at dwellings with a facade incident noise level in excess of 66dB LAeq 16h daytime (07h00 to 23h00); and
  - (ii) which are subject to the Predicted Road Traffic Noise Increase.

**"Residential Noise Insulation Scheme"** means the approved scheme incorporated within the Noise Management Plan under which noise insulation works to residential dwellings that meet the Residential Eligibility Criteria and are situate in any local authority area will be funded by the Operator and which scheme incorporate each of the following:

- (a) The Residential Eligibility Criteria and any restrictions on the number of applications for funding which may be made under the Residential Noise Insulation Scheme;
- (b) A description including specification and standard of noise reduction for the works which may be funded by the Residential Noise Insulation Scheme and how (if at all) these will vary according to which of the Residential Eligibility Criteria are met;
- (c) Any exclusions from the Residential Eligibility Criteria which may for the avoidance of doubt include dwellings where the specification and standard of noise reduction for works which may be funded by the Residential Noise Insulation Scheme are already met by the condition of the existing building fabric;
- (d) Details of how the Residential Noise Insulation Scheme is to be administered by LLACC including:
  - (i) the address to which applications are to be made;

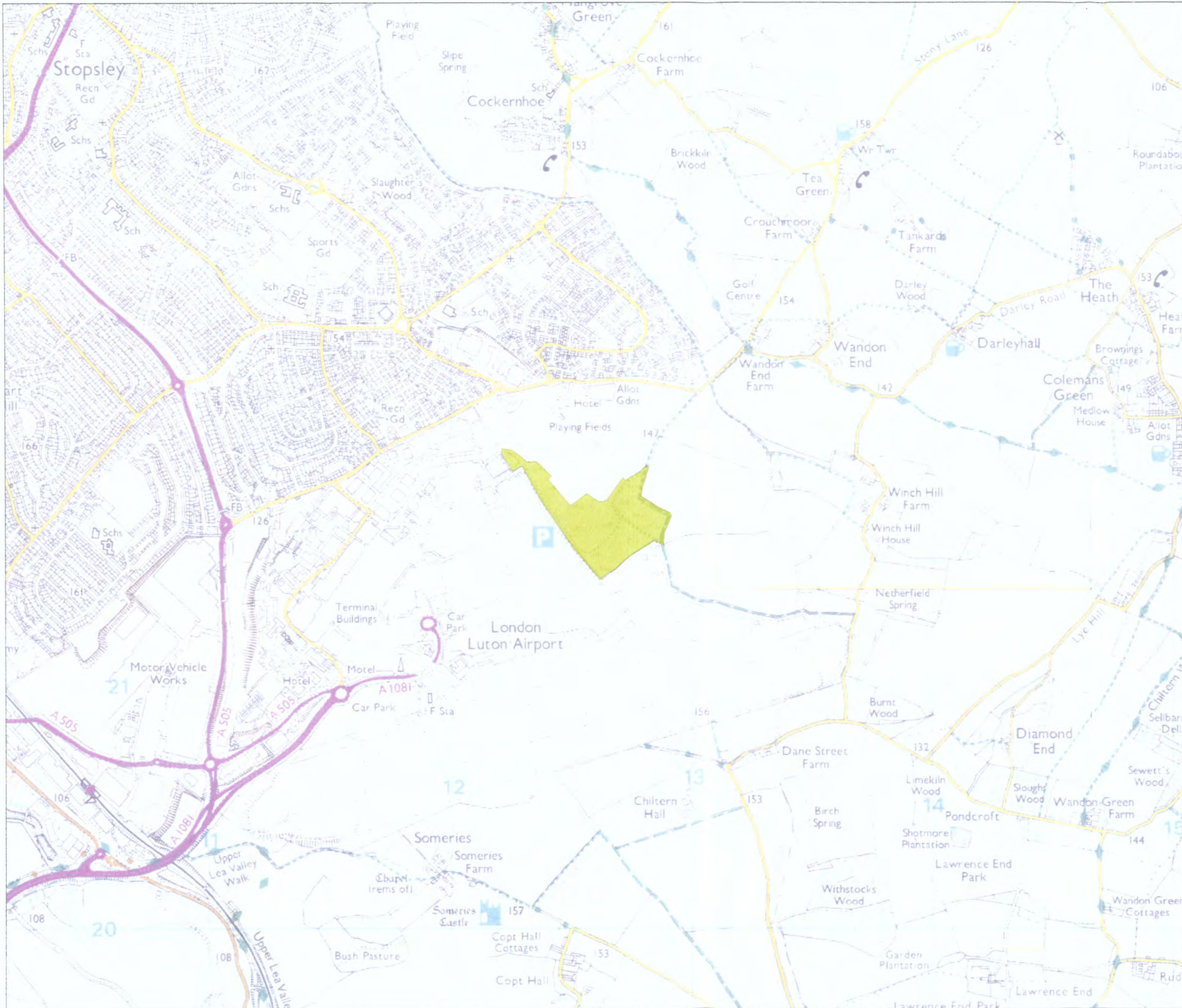












Wigmore Park Country Wildlife Site



Plan 5: Extent of Wigmore Valley Park

LLAOL project curium  
London Luton Airport

0 360 m



Dwgn/158607K/001	Revision	
19 May 2014	Drawn by: JC	Checked by: NT
Scale: 1:15,000 @A3		

Based upon the 2013 Ordnance Survey 1:25,000 colour raster map with the permission of the Ordnance Survey on behalf of Her Majesty's Stationery Office. © Crown copyright. Terence O'Rourke Ltd. Licence No. 100019980.

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- (ii) the process by which it will be established whether the applicant meets the Residential Eligibility Criteria;
  - (iii) the timetable for processing applications; and
  - (iv) the maximum amount and timing of payments.
- (e) Measures to publicise the Residential Noise Insulation Scheme and the Residential Eligibility Criteria.

**"the RNIS Review Dates"** means 30 June 2025 and subsequently every five years from 30 June 2025;

**"Second Planning Permission"** means the planning permission dated 13 October 2017 granted under ref: 15/00950/VARCON pursuant to section 73 of the Act to vary condition 11(i) of the First Planning Permission;

**"Secretaries of State"** means the Secretary of State for Levelling Up, Housing and Communities and the Secretary of State for Transport;

**"Section 73 Application"** means the application registered by the Council under ref: 21/00031/VARCON pursuant to section 73 of the Act to vary conditions 8 (passenger through cap), 10 (noise contours), 22 (car parking management), 24 (travel plan) and 28 (approved plans and documents) of the Second Planning Permission;

**"Section 73 Planning Permission"** means a planning permission granted by the Secretaries of State pursuant to the Section 73 Application;

**"the Sustainability Report"** means the annual report which the Operator is required to publish and submit to the Council pursuant to Schedule 7 and which shall (to the extent required by the obligations in this Agreement) report on the performance of the Operator in the preceding calendar year against the terms of the Sustainability Strategy;

**"the Sustainability Strategy"** means the written strategy to be submitted to the Council in accordance with Schedule 4 which will have the objective of minimising environmental impact and maximising socio-economic impact with specific actions in the areas of net zero, sustainable aviation and community and social value;

**"Track Violation Penalty System"** means a system to be operated pursuant to Schedule 1 of this Agreement through which such financial penalties as the Operator considers to be reasonable ("**Penalties**") are levied on an airline on any occasion when the aircraft which it operates at the Airport deviates from the noise preferential route without specific instruction to that effect from air traffic control or other than due to adverse weather conditions;

**"the Transport Forum"** means the partnership arrangements already established at the Implementation Date by the Operator between itself, public transport operators, the Council, local people and businesses and other interested parties in accordance with the Department for Transport's Guidance on Airport Transport Forums and Airport Surface Access Strategies (26 July 1999) or any replacement or modification of such guidance, which more particularly has the objectives of (amongst other things):

- creating a collaborative environment for stakeholders to maintain a longer-term approach to transport planning at the Airport;
- tracking actions and performance against the Travel Plan and Airport Surface Access Strategy (as updated from time to time);
- discussing key projects within or impacting surface access at the Airport; and
- discussing challenges or trends across the transport and aviation industries;

**"Travel Plan"** means the document entitled "London Luton Airport 19mmpa Expansion Travel Plan" prepared by WSP dated November 2022 and submitted and revised during the public inquiry (ref. APP/B0230/V/22/3296455) in support of the Section 73 Application and attached at Annexure 3 to this Agreement which for the avoidance of doubt includes a



specific measure on the Operator to prepare and submit to the Council for approval a car park management plan;

**"Updated Airport Surface Access Strategy"** means a strategy to be submitted pursuant to Schedule 2 of this Agreement which shall contain an emphasis on sustainable modes of transport including reference to (as applicable) additional staff parking, staff cycle parking and electric charging points;

**"Updated Employment Skills and Recruitment Plan"** means a plan to be submitted pursuant to Schedule 5 of this Agreement which specifies the measures that will be taken by the Operator to make available to people in the Local Area opportunities to find employment and to improve their skills during the operation of the Development to take account of the uplifted capacity as a result of the Section 73 Planning Permission;

**"Updated Travel Plan"** means (if applicable) an update to the Travel Plan submitted to and approved by the Council pursuant to paragraphs 2.2 and 2.3 of Schedule 2 to this Agreement which for the avoidance of doubt shall include a specific measure on the Operator to prepare and submit to the Council for approval a car park management plan;

**"Wigmore Valley Park"** means the park known as Wigmore Valley Park shown for identification purposes coloured green on Plan 3.

**"Wigmore Valley Park Works"** means such grassland and hedgerow management at Wigmore Valley Park and areas around the perimeter fence line of the Airport as the Operator considers necessary (acting reasonably);

**"Working Day"** means a Monday through to and including Friday save for bank holidays in the UK;

- 1.2 Words importing the singular shall include the plural and vice versa.
- 1.3 Words importing one gender include all other genders.
- 1.4 Clause headings (if any) are inserted for convenience only and shall not affect the construction of this Agreement and all references to clauses and sub-clauses are to clauses and sub-clauses of this Agreement.
- 1.5 References to statutes or statutory instruments include references to any modification extension or re-enactment of them from time to time.
- 1.6 References in this Agreement to the Council shall include any successor to its statutory functions.
2. **STATUTORY POWER AND ENFORCING AUTHORITY**
  - 2.1 This Agreement is made as a Deed pursuant to Section 106 and 106A of the Act and Section 111 of the Local Government Act 1972 and the obligations and the Schedules are planning obligations and covenants binding on the Land for the purposes of those statutory provisions and are enforceable by the Council.
3. **THE PLANNING OBLIGATIONS - OPERATOR**
  - 3.1 The Operator covenants with the Council so as to bind its leasehold interest in the Land:
    - 3.1.1 to observe and perform and cause to be observed and performed the covenants and restrictions contained in this clause and the Schedules to this Agreement;  
and
    - 3.1.2 not to carry out the Development or conduct the operation of the Airport otherwise than in accordance with this Agreement.
4. **THE PLANNING OBLIGATIONS - OWNER**
  - 4.1 The Owner covenants with the Council so as to bind the freehold interest in the Land to observe and perform the covenants and restrictions entered into by the Operator at Clause 3 Provided That the second named party, London Luton Airport Limited (but not those deriving title from London Luton Airport Limited) shall not be obliged to perform its



covenants under this Clause except at any time when the Operator Lease is determined and there is no lease or agreement with any person deriving title to the Land from London Luton Airport Limited or the Operator so as to render this agreement enforceable against that person by virtue of section 106(3)(b) of the Act.

- 4.2 Liability under any covenant referred to in this clause shall be limited to the obligations or the parts of the obligations that remain to be performed under this Agreement at the time that the covenant is entered into.

5. **COUNCIL'S COVENANTS**

The Council covenants with the Owner and the Operator to observe and perform the obligations on its part contained in the Schedules to this Agreement.

6. **MORTGAGEE'S CONSENT**

The Mortgagee consents to the Operator's obligations at Clause 3 and acknowledges that the Land shall be bound by them save that the Mortgagee (or any subsequent mortgagee or chargee) shall not be obliged to perform them unless it becomes a mortgagee in possession of the Land. The Mortgagee, and any future mortgagee of the Land, shall have no liability after it has discharged the security or has disposed of the Land which is subject to its security whether by sale or otherwise PROVIDED ALWAYS that the Mortgagee will not be released from any liability incurred prior to this.

7. **LEGAL EFFECT**

- 7.1 No person shall be liable for any breach of the obligations contained in this Agreement after it has parted with its interest in the Land or the relevant part of the Land in respect of which the breach relates, other than in respect of any breach by it at the time when it held such an interest.
- 7.2 The obligations in this Agreement shall not be enforceable against any individual lessees or purchasers Occupying or entitled to immediate Occupation of any commercial units within the Development.
- 7.3 The obligations in this Agreement shall not be enforceable against any Essential Service Provider.
- 7.4 No person other than the Council, the Operator, the Mortgagee and the Owner shall have the benefit of or be capable of enforcing any term of this Agreement as a result of the Contracts (Rights of Third Parties) Act 1999.
- 7.5 All parties to this Agreement acknowledge that they are under an obligation to act reasonably and (without prejudice to the generality of that obligation) if any certificate consent permission expression of satisfaction or other approval is due from one party to another or any person on their behalf under the terms of this Agreement it shall not be unreasonably withheld or delayed.
- 7.6 Nothing in this Agreement shall fetter prejudice or affect the Council's powers to enforce any specific obligation or term or condition nor shall anything contained in this Agreement fetter prejudice or affect any provisions rights powers duties and obligations of the Council in the exercise of its functions as a local planning authority for the purposes of the Act or otherwise as a local authority.
- 7.7 No waiver (whether express or implied) by the Council of any breach or default in performing or observing any of the covenants terms or conditions of this Agreement shall constitute a continuing waiver and no such waiver shall prevent the Council from enforcing any of the relevant terms or conditions or from acting upon any subsequent breach or default.
- 7.8 If any provision in this Agreement shall in whole or in part be found (for whatever reason) to be invalid or unenforceable then such invalidity or unenforceability shall not affect the validity or enforceability of the remaining provisions of this Agreement.



7.9 Nothing in this Agreement shall prohibit or limit the right to develop any part of the Land in accordance with a planning permission (other than the Section 73 Planning Permission) granted (whether or not on appeal) after the Implementation Date.

## 8. NOTICES

8.1 All notices served under or in connection with this Agreement shall be deemed to have been properly served if sent by recorded delivery (save for clause 8.2.1) to the principal address or registered office (as appropriate) of the relevant party.

8.2 The provisions of section 196 of the Law of Property Act 1925 shall apply to any notice to be served under or in connection with this Agreement and any notice to the:

8.2.1 Council shall be in writing or by email to the Monitoring Officer and shall cite the s106 reference number "S.106/21/00031/VARCON";

8.2.2 Operator shall be in writing and addressed to the General Counsel, Percival House, 134 Percival Way, London Luton Airport, Luton, LU2 9NU;

8.2.3 Owner shall be in writing and addressed to the Owner (c/o the Company Secretary), Town Hall, Luton LU1 2BQ; and

8.2.4 Mortgagee shall be in writing and addressed FAO Naveed Rana (Relationship Manager, Lending Products Franchise), NatWest, 250 Bishopsgate, London, EC2M 4AA.

## 9. LOCAL LAND CHARGE

This Agreement is a Local Land Charge and shall be registered in the Register of Local Land Charges.

## 10. INTEREST

If any payment due under this Agreement is paid late, Interest will be payable from the date payment is due to the date of payment.

## 11. VAT

All consideration given in accordance with the terms of this Agreement shall be exclusive of any value added tax properly payable.

## 12. DISPUTE RESOLUTION

12.1 In the event of any dispute or difference arising between any of the parties to this Agreement in respect of any matter contained in this Agreement (including the refusal of any approval required pursuant to this Agreement) other than the calculation of contribution amounts or the timing of payment of contributions such dispute or difference shall be referred to an independent and suitable person holding appropriate professional qualifications to be appointed (in the absence of an agreement) by or on behalf of the president for the time being of the Chartered Institute of Arbitrators and such person shall act as an expert whose decision shall be final and binding on the parties in the absence of manifest error and any costs shall be payable by the parties to the dispute in such proportion as the expert shall determine and failing such determination shall be borne by the parties in equal shares.

12.2 Any expert howsoever appointed shall be subject to the express requirement that a decision is reached and communicated to the relevant parties within the minimum practicable timescale allowing for the nature and complexity of the dispute.

## 13. COUNTERPARTS

This Agreement may be executed in any number of counterparts, each of which is an original and all of which together evidence the same agreement.

14. **GOVERNING LAW**

This Agreement is governed by and interpreted in accordance with the law of England and Wales and the parties submit to the exclusive jurisdiction of the courts of England and Wales.

**IN WITNESS** of which the Operator, the Owner, and the Mortgagee have executed this Agreement as a Deed and the Council has affixed its Common Seal the day and year above written.



**SCHEDULE 1  
NOISE MITIGATION**

**1. NOISE MANAGEMENT PLAN**

- 1.1 From the Implementation Date the Operator shall implement and operate the approved Noise Management Plan subject to such modifications as may be agreed in writing by the Council following review of the Noise Management Plan as provided for in the ensuing sub-paragraph 1.2 of this Schedule.
- 1.2 The Noise Management Plan shall be subject to periodic review by the Council on the Noise Management Plan Review Dates as follows:
- 1.2.1 On or before each of the Noise Management Plan Review Dates the Operator shall produce and submit to the Council for the Council's written approval a report on the operation of the Noise Management Plan which shall review the effectiveness of the Noise Management Plan in achieving the principal objective of minimising noise disturbance from aircraft using the Airport and which shall include for the period since the Noise Management Plan was last approved by the Council or since the last Noise Management Plan Review Date (whichever shall be the later date) as a minimum the following:
- (A) the details of aircraft using the airport including the numbers and types of aircraft taking off and landing at the Airport;
  - (B) details of any infringements of noise limits specified for arriving and departing aircraft and of any deviations from the tracks to be followed by aircraft using the Airport;
  - (C) the number of complaints received from the public in relation to noise disturbance, together with their details including their geographic origin and type;
  - (D) details of any Penalties imposed upon aircraft operators under the terms of the Noise Management Plan;
  - (E) details of the airborne noise and ground noise abatement procedures adopted for the Airport and their effectiveness;
  - (F) the effectiveness of any modifications to the Noise Management Plan or earlier review of it previously implemented;
  - (G) any proposed modifications to the Noise Management Plan to achieve better the principal objective of minimising noise disturbance from aircraft using the Airport.
- 1.2.2 The Council shall either:
- (A) approve such report; or
  - (B) (acting reasonably) request in writing that the report incorporates further or modified information and controls to the extent necessary to be able fully to monitor the operation of the Noise Management Plan or to achieve better the principal objective of minimising noise disturbance from aircraft using the Airport, including (if appropriate) further or alternative modifications to the Noise Management Plan.
- 1.2.3 If the Operator receives a written request from the Council pursuant to sub-paragraph 1.2.2(B) of this Schedule it shall resubmit a modified draft of the report within one month of receiving the written request and shall subsequently resubmit the report with further modifications as often as is reasonably necessary until the Council shall have approved in writing the report.
- 1.2.4 Any modifications to the Noise Management Plan incorporated in any report approved by the Council under sub-paragraph 1.2.2(B) or 1.2.3 above shall be implemented by the Operator within three months of that approval.



- 1.3 Nothing in sub-paragraph 1.2 of this Schedule shall require the Operator to make modifications to matters within any Noise Action Plan that has been approved or accepted by the Department for Environment Food and Rural Affairs (or such other successive Government department or body which is responsible for the approval of noise action plans in England).

***Residential Noise Insulation Scheme***

- 1.4 From the Implementation Date the Operator shall implement and operate the approved Residential Noise Insulation Scheme in the manner provided for in sub-paragraphs 1.5 and 1.6 of this Schedule subject to such modifications as may be agreed in writing by the Council following review of the Residential Noise Insulation Scheme as provided for in the ensuing sub-paragraph 1.7 of this Schedule.
- 1.5 The Operator shall procure (unless otherwise agreed in writing by the Council) that with effect from the implementation of the approved Residential Noise Insulation Scheme the same is administered by LLACC and the Operator shall provide any necessary support and assistance reasonably requested by LLACC with the administration of the Residential Noise Insulation Scheme.
- 1.6 Any payments in respect of noise insulation works made under the Residential Noise Insulation Scheme shall be funded using the Noise Insulation Fund.
- 1.7 The Residential Noise Insulation Scheme shall be subject to periodic review by the Council on the RNIS Review Dates as follows:
- 1.7.1 On or before each of the RNIS Review Dates; the Operator shall produce and submit to the Council for its written approval a report on the operation of the Residential Noise Insulation Scheme which shall review the effectiveness of the Residential Noise Insulation Scheme and which shall include for the period since the Residential Noise Insulation Scheme was last approved by the Council or since the last RNIS Review Date (whichever shall be the later date) as a minimum the following:
- (A) the number of applications received under the Residential Noise Insulation Scheme, together with details of their geographic origin, the Residential Eligibility Criteria relied upon by the applicant and the outcome of each application;
  - (B) the total expenditure under the Residential Noise Insulation Scheme in each year preceding the RNIS Review Date; and
  - (C) details of any proposed modifications to the Residential Noise Insulation Scheme to improve its operation.
- 1.7.2 The Council shall either:
- (A) approve such report; or
  - (B) (acting reasonably) request in writing that the report incorporates further or modified information to the extent necessary to be able fully to monitor the operation of the Residential Noise Insulation Scheme or to improve its operation, including (if appropriate) further or alternative modifications to the Residential Noise Insulation Scheme.
- 1.7.3 If the Operator receives a written request from the Council pursuant to sub-paragraph 1.7.2(B) of this Schedule it shall resubmit a modified draft of the report within one month of receiving the written request and subsequently resubmit the report with further modifications as often as reasonably necessary until the Council shall have approved the report in writing.
- 1.7.4 Where any report approved by the Council under sub-paragraph 1.7.2(B) or 1.7.3 above incorporates modifications to the Residential Noise Insulation scheme the Operator shall:



- (A) where the modifications are within the control of the Operator, implement them within three months of that approval, or
- (B) where the modifications are within the control of LLACC, use reasonable endeavours to secure that they are so implemented.

***Non-residential Noise Insulation Scheme***

- 1.8 From the Implementation Date the Operator shall implement and operate the approved Non-Residential Noise Insulation Scheme in the manner provided for in sub-paragraphs 1.9 and 1.10 of this Schedule, subject to such modifications as may be agreed in writing by the Council following review of the Non-Residential Noise Insulation Scheme as provided for in the ensuing sub-paragraph 1.11 of this Schedule.
- 1.9 The Operator shall procure (unless otherwise agreed in writing by the Council) that with effect from the implementation of the approved Non-Residential Noise Insulation Scheme, the same is administered by LLACC and the Operator shall provide any necessary support and assistance reasonably requested by LLACC with the administration of the Non-Residential Noise Insulation Scheme.
- 1.10 Any payments in respect of noise insulation works made under the Non-Residential Noise Insulation Scheme shall be funded using the Noise Insulation Fund.
- 1.11 The Non-Residential Noise Insulation Scheme shall be subject to periodic review by the Council on the Non-Residential Noise Insulation Scheme Review Dates as follows:
  - 1.11.1 On or before each of the Non-Residential Noise Insulation Scheme Review Dates, the Operator shall produce and submit to the Council for its written approval a report on the operation of the Non-Residential Noise Insulation Scheme, which shall review the effectiveness of the Non-Residential Noise Insulation Scheme and which shall include for the period since the Non-Residential Noise Insulation Scheme was last approved by the Council, or since the last Non-Residential Noise Insulation Scheme Review Date (whichever shall be the later date) as a minimum the following:
    - (A) the number of applications received under the Non-Residential Noise Insulation Scheme, together with details of their geographic origin, the eligibility criteria relied upon by the applicant and the outcome of each application;
    - (B) the total expenditure under the Non-Residential Noise Insulation Scheme in each year preceding the Non-Residential Noise Insulation Scheme Review Date; and
    - (C) details of any proposed modifications to the Non-Residential Noise Insulation Scheme to improve its operation.
  - 1.11.2 The Council shall either:
    - (A) approve such report; or
    - (B) (acting reasonably) request in writing that the report incorporates further or modified information to the extent necessary to be able fully to monitor the operation of the Non-Residential Noise Insulation Scheme or to improve its operation, including (if appropriate) further or alternative modifications to the Non-Residential Noise Insulation Scheme.
  - 1.11.3 If the Operator receives a written request from the Council pursuant to sub-paragraph 1.11.2(B) of this Schedule it shall resubmit a modified draft of the report within one month of receiving the written request, and subsequently resubmit the report with further modifications as often as reasonably necessary until the Council shall have approved in writing the report.
  - 1.11.4 Where any report approved by the Council under sub-paragraph 1.11.2(B) or 1.11.3 above incorporates modifications to the Non-Residential Noise Insulation scheme the Operator shall:



- (A) where the modifications are within the control of the Operator implement them within three months of that approval, or
- (B) where the modifications are within the control of LLACC use reasonable endeavours to secure that they are so implemented.

#### **Noise Insulation Fund**

- 1.12 From the Implementation Date the Operator shall maintain the Noise Insulation Fund in the following manner:
  - 1.12.1 The Operator shall procure (unless otherwise agreed in writing by the Council) that the Noise Insulation Fund shall be administered by LLACC in conjunction with the Noise Insulation Schemes.
  - 1.12.2 The Operator agrees to fund noise insulation works to be carried out pursuant to the approved Non-Residential Noise Insulation Scheme and Residential Noise Insulation Scheme in order to operate the approved Noise Insulation Scheme;
  - 1.12.3 Without prejudice to the general obligation contained within paragraph 1.12.2, the Operator shall use reasonable endeavours to ensure that a minimum of £150,000 (one hundred and fifty thousand pounds) Index Linked shall be spent every calendar year (for five calendar years from the Implementation Date) on noise insulation works carried out pursuant to the approved Noise Insulation Scheme.

#### **Track Violations**

- 1.13 Having established the Track Violation Penalty System prior to the Implementation Date, the Operator shall continue to operate and maintain the Track Violation Penalty System.
- 1.14 On each of the relevant reporting dates set out in Schedule 7 of this Agreement the Operator shall submit to the Council for its written approval a report on the operation of the Track Violation Penalty System, which shall review the effectiveness of the Track Violation Penalty System and which shall include as a minimum the following for the preceding year:
  - 1.14.1 the number of Penalties levied by the Operator and the amount of revenue received by the Operator in payment of those Penalties;
  - 1.14.2 the categories of the violations by the airlines which gave rise to the Penalties;
  - 1.14.3 the amount levied against each airline and each aircraft type which operates at the Airport; and
  - 1.14.4 whether modifications to the level of Penalty under the Track Violation Penalty System are necessary (and so the nature of those modifications) to improve its effectiveness in minimising the noise disturbance of residents.
- 1.15 The Council shall either:
  - 1.15.1 approve such report; or
  - 1.15.2 (acting reasonably) request in writing that the report incorporates further or modified information to the extent necessary to be able fully to monitor the operation of the Track Violation Penalty System, or further, or alternative modifications to the Track Violation Penalty System in order to improve its effectiveness in controlling the pattern of aircraft operations and minimising the noise disturbance of residents from such aircraft and to improve the operation of the airport.
- 1.16 If the Operator receives a written request from the Council pursuant to sub-paragraph 1.15.2 of this Schedule it shall resubmit a modified draft of the report within one month of receiving the written request and subsequently resubmit the report with further modifications as often as reasonably necessary until the Council shall have approved in writing the report.



- 1.17 Any modifications to the Noise Management Plan incorporated in any report approved by the Council under sub-paragraph 1.15.1 or 1.16 above shall be implemented by the Operator within three months of that approval.

**SCHEDULE 2  
TRAFFIC AND TRANSPORTATION**

1. **TRANSPORT FORUM AND AIRPORT SURFACE ACCESS STRATEGY**
- 1.1 The Operator shall continue to operate at its own expense and work with members of the Transport Forum to improve access to the Airport by surface transport.
- 1.2 The Operator shall organise a meeting of the Transport Forum at least annually. The Transport Forum shall have the purpose of scrutinising the performance of the Airport against the Airport Surface Access Strategy (as updated from time to time) and of assisting the Airport in achieving its objectives.
- 1.3 The Operator shall continue to implement the actions and pursue the objectives contained in the approved Airport Surface Access Strategy and, within 12 months of the Implementation Date and in any event prior to the Airport exceeding the commercial passenger throughput cap in condition 8 of the Second Planning Permission, the Operator shall submit an updated Airport Surface Access Strategy for the approval of the Council ("**Updated Airport Surface Access Strategy**").
- 1.4 The Updated Airport Surface Access Strategy shall have the objectives of promoting and encouraging sustainable surface transport options for employees and passengers and reducing the impact of surface access to the Airport on the local community. The Updated Airport Surface Access Strategy shall be written as a public facing document which clearly explains to members of the Transport Forum and the public: (a) an overview of surface access modes at the Airport; (b) the targets which the Operator is required to meet under the Travel Plan or Updated Travel Plan (as applicable); (c) an overview of the measures which the Airport is putting in place to achieve the targets set out in the Travel Plan or Updated Travel Plan (as applicable); and (d) a report on progress against targets set out in the Travel Plan or Updated Travel Plan (as applicable).
- 1.5 In the event that the Council declines to approve any draft of the Updated Airport Surface Access Strategy, the Operator shall submit a revised draft of the same to the Council within a further period of one month from receipt by the Operator of the Council's notification of the draft Updated Airport Surface Access Strategy not being acceptable and the revised draft shall address the Council's reasons for refusal to accept the previous draft. This process shall be repeated as often as reasonably necessary until the Updated Airport Surface Access Strategy is approved in writing by the Council.
- 1.6 Following approval of the Updated Airport Surface Access Strategy, the Operator shall implement the approved Updated Airport Surface Access Strategy.
- 1.7 The Updated Airport Surface Access Strategy shall then be reviewed every five years in accordance with the Department for Transport's Guidance on Airport Transport Forums and Airport Surface Access Strategies (26 July 1999) (or any replacement or modification of such guidance) ("**Guidance**") and the Operator shall incorporate any amendments required as a result of updates to the Guidance into the Updated Airport Surface Access Strategy and provide a copy to the Council.
- 1.8 Annually and as part of each Sustainability Report (which the Operator shall make available to the Transport Forum at the same time as its submission to the Council) and provided that the Council shall have first supplied all relevant data concerning surface access to the Airport which is within its control at least two months prior to the due date for publication of the Sustainability Report, the Operator shall report on the operation of the Updated Airport Surface Access Strategy including the progress against each action and objective identified in the Updated Airport Surface Access Strategy and patterns of use of surface transport by staff and passengers travelling to and from the Airport, including but not necessarily limited to the matters set out in paragraph 1(B) of Schedule 7 to this Agreement.
- 1.9 The Council covenants with the Owner and the Operator to provide all data within its control which may be relevant to the matters on which the Operator is obliged to report



under paragraph 1.8 of this Schedule and shall do so at least two months prior to the due date for publication of the Sustainability Report in any one year.

## 2. TRAVEL PLANS

### *Passenger and Staff Travel Plan*

- 2.1 From the Implementation Date the Operator shall implement the Travel Plan in accordance with the programme of implementation set out within it.
- 2.2 In the event that the Secretaries of State identify in their Decision Letter that it is necessary for there to be an update to the Travel Plan prior to the Airport exceeding the commercial passenger throughput cap in condition 8 of the Second Planning Permission then the Operator shall, prior to the Airport exceeding such cap, submit to the Council for approval an update to the Travel Plan (the "**Updated Travel Plan**"). This shall include, as a minimum, the measures set out in the Travel Plan and shall include any necessary additional or enhanced targets or objectives.
- 2.3 In the event that the Council declines to approve any draft of an Updated Travel Plan, the Operator shall submit a revised draft of the same to the Council within a period of one month from receipt by the Operator of the Council's notification of the draft Updated Travel Plan not being acceptable and the revised draft shall address the Council's reasons for refusal to accept the previous draft. This process shall be repeated as often as reasonably necessary until the Updated Travel Plan is approved in writing by the Council and then the Operator shall implement the Updated Travel Plan as approved.
- 2.4 On the occasion of the first anniversary of the date of implementation of the Travel Plan or Updated Travel Plan (if applicable) and subsequently every five years from such date the Operator shall produce and submit to the Council for its written approval a report on the Travel Plan which shall:
- 2.4.1 identify how the Travel Plan or Updated Travel Plan (as applicable) has been performing against the agreed objectives and targets; and
  - 2.4.2 if appropriate, state the proposals and remedies to improve performance of the Travel Plan or Updated Travel Plan (as applicable) to meet the agreed objectives and targets (including without limitation modal split).
- 2.5 In either case, if the report submitted by the Operator pursuant to paragraph 2.4 of this Schedule evidences in the reasonable opinion of the Council a travel plan which is not achieving the agreed objectives and targets and does not include adequate proposals and/or remedies to achieve such objectives and targets, then the Operator shall submit to the Council for its approval in writing modified proposals and/or remedies or modified targets (including without limitation targets for modal split) for the relevant plan. This process shall be repeated as often as reasonably necessary until such revised proposals and/or remedies or such revised targets are approved by the Council.
- 2.6 The Operator shall implement the Travel Plan or Updated Travel Plan (as applicable) with any approved modifications arising from the review and reporting procedure identified in paragraph 2.4 of this Schedule and shall submit a copy of any such modified plan (following the review and reporting procedure or otherwise) to the Council.
- 2.7 Without prejudice to the reporting requirements in paragraph 1(B) of Schedule 7, during the period between the periodic reviews of the Travel Plan or Updated Travel Plan (as applicable) the Council (as local planning authority and local highway authority) and the Operator shall meet at least every 12 months following the Implementation Date and at that meeting review the effectiveness of the Travel Plan or Updated Travel Plan (as applicable) against their respective objectives and targets.
- 2.8 The Council shall otherwise:
- 2.8.1 provide support and advice to the Operator in implementing the Travel Plan or Updated Travel Plan (as applicable); and



- 2.8.2 respond to any report or proposals submitted pursuant to the review and reporting procedure in paragraph 2.4 of this Schedule within six weeks of the date of receipt of the same by the Council with either approval or the reasons to explain to the Operator why such report or proposal is not acceptable.

***Construction Travel Plan***

- 2.9 With effect from the Implementation Date, the Operator shall continue to implement the approved Construction Travel Plan and subsequently until completion of the construction of the Development in accordance with the Phasing Scheme operate and maintain the Construction Travel Plan.
- 2.10 During the period of construction of the Development the Council (as local planning authority and local highway authority) and the Operator shall meet at least every 12 months and at that meeting review the effectiveness of the Construction Travel Plan against the relevant objectives and targets and if the objectives and targets in the Construction Travel Plan are not being met use reasonable endeavours to agree revised proposals to achieve those objectives and targets.



**SCHEDULE 3**  
**LONDON LUTON AIRPORT CONSULTATIVE COMMITTEE**

1. The Operator shall continue to operate the LLACC at its own cost as part of the facilities for consultation which it is obliged to maintain pursuant to its duties under Section 35 of the Civil Aviation Act 1982 as manager of a designated aerodrome.
2. Having submitted a revised constitution for LLACC to the Council prior to the Second S106 Agreement (attached at Annexure 6 to the Second S106 Agreement), the Operator shall, in each year of its publication, present the principal findings and conclusions of the Sustainability Report to LLACC and shall provide LLACC with a copy of each Quarterly Flight Operations Report at the same time as it is submitted to the Council in accordance with Schedule 7.



**SCHEDULE 4  
SUSTAINABILITY AND CARBON REDUCTION**

***Sustainability***

1. The Operator shall implement and continue to operate the Existing Sustainability Strategy.
  2. Prior to the Airport exceeding the commercial passenger throughput cap in condition 8 of the Second Planning Permission, the Operator shall have submitted to the Council for approval an updated sustainability strategy (the "**Sustainability Strategy**").
  3. In the event that the Council declines to approve any draft of the updated sustainability strategy submitted pursuant to paragraph 2 of this Schedule the Operator shall submit a revised draft of the same to the Council within a period of one month from receipt by the Operator of the Council's notification of the draft updated sustainability strategy not being acceptable and the revised draft shall address the Council's reasons for refusal to accept the previous draft. This process shall be repeated as often as reasonably necessary until the Sustainability Strategy is approved in writing by the Council. The approved Sustainability Strategy shall then be implemented and operated by the Operator.
  4. During the operation of the Sustainability Strategy approved pursuant to paragraphs 2 and 3 of this Schedule 4, the Operator shall report to the Council annually as part of the Sustainability Report on the performance of the Airport against the targets in the Sustainability Strategy.
  5. At intervals of every five years from the date of approval of the Sustainability Strategy, the Operator shall produce and submit to the Council for its written approval a report on the implementation of the Sustainability Strategy which shall:
    - (A) describe the measures taken in the preceding five years and assess the outcome of those measures;
    - (B) assess the extent to which the Airport has met the performance targets identified in the Sustainability Strategy; and
    - (C) propose the modifications (if any) which should be made to the Sustainability Strategy in order to ensure that the Airport meets the performance targets identified in the then existing Sustainability Strategy or otherwise to improve the sustainability of the Airport without compromising the safety of operations at the Airport.
  6. If the report submitted by the Operator pursuant to paragraph 5 of this Schedule:
    - (D) evidences in the reasonable opinion of the Council a Sustainability Strategy which is not achieving the performance targets in the approved Sustainability Strategy and does not include adequate modifications to achieve such targets; or
    - (E) does not include sufficiently realistic or challenging performance targets for achieving the objective of improving the sustainability of the Airport without compromising the safety of its operations,then the Operator shall submit to the Council for its approval in writing further modifications of the Sustainability Strategy and this process shall be repeated as often as reasonably necessary until such modifications are approved by the Council.
  7. The Operator shall implement the approved Sustainability Strategy with any approved modifications arising from the review and reporting procedure identified in paragraphs 5 and 6 of this Schedule and shall submit a copy of any such modified Sustainability Strategy (following the review and reporting procedure or otherwise) to the Council.
- Carbon reduction***
8. Prior to the Airport exceeding the commercial passenger throughput cap in condition 8 of the Second Planning Permission, the Operator shall have submitted to the Council for approval a Carbon Reduction Strategy which shall be informed by the carbon mitigation targets and measures in the Outline Carbon Reduction Plan.



9. In the event that the Council declines to approve any draft of the Carbon Reduction Strategy submitted pursuant to paragraph 8 of this Schedule, the Operator shall submit a revised draft of the same to the Council within a period of one month from receipt by the Operator of the Council's notification of the draft Carbon Reduction Strategy not being acceptable and the revised draft shall address the Council's reasons for refusal to accept the previous draft. This process shall be repeated as often as reasonably necessary until the Carbon Reduction Strategy is approved in writing by the Council. The approved Carbon Reduction Strategy shall be implemented and operated by the Operator.
  10. During the operation of the Carbon Reduction Strategy approved pursuant to paragraphs 8 and 9 of this Schedule 4, the Operator shall report to the Council annually as part of the Sustainability Report on the performance of the Airport against the targets in the Carbon Reduction Strategy
  11. The Carbon Reduction Strategy shall be reviewed at least every five years following its approval in consultation with relevant stakeholders and the updated strategy shall be submitted to the Council for its approval. The process in paragraph 9 of this Schedule 4 shall apply to each update of the Carbon Reduction Strategy and each such update shall accord with any new national policies or targets.
  12. The methodology and/or interim targets in the Carbon Reduction Strategy may be amended from time to time by agreement with the Council to include any updates to best practice in the area of carbon reduction methods or techniques.
- Wigmore Valley***
13. In each calendar year, the Operator shall either procure the carrying out of the Wigmore Valley Park Works or commit a minimum of (but cannot be required to spend more than) the Environmental Management Payment for the purposes of the Wigmore Valley Park Works.



**SCHEDULE 5**  
**LOCAL EMPLOYMENT AND SUPPLY CHAINS**

1. Having obtained the approval of the Local Procurement Protocol and the Employment Skills and Recruitment Plan prior to the Implementation Date, the Operator shall carry out the Development in accordance with the approved Local Procurement Protocol and the approved Employment Skills and Recruitment Plan Provided That this shall not prejudice the proper and reasonable evaluation and selection of bidders, tenders and candidates by the Operator or its contractors.
2. Prior to the Airport exceeding the commercial passenger throughput cap in condition 8 of the Second Planning Permission, the Operator shall submit a draft Updated Employment Skills and Recruitment Plan to the Council for approval and forthwith from the date of approval of the Updated Employment Skills and Recruitment Plan by the Council, the Operator shall comply with such approved Updated Employment Skills and Recruitment Plan (and such updated plan shall be deemed to replace the currently approved Employment Skills and Recruitment Plan which shall no longer be of effect).
3. The Operator shall promote the Employment Skills and Recruitment Plan (as may be approved from time to time) and the Local Procurement Protocol to businesses operating at the Airport and shall use reasonable endeavours to ensure that the Development is Occupied in accordance with the Employment Skills and Recruitment Plan and the Local Procurement Protocol.
4. Provided that the Council shall have first supplied all relevant data concerning employment at the Airport which is within its control at least two months prior to the due date for publication of the Sustainability Report the Operator shall report annually on the effectiveness of the Employment Skills and Recruitment Plan (or Updated Employment Skills and Recruitment Plan, once approved) and the Local Procurement Protocol as part of the Sustainability Report.
5. The Council covenants with the Owner and the Operator to provide all data within its control which may be relevant to the matters on which the Operator is obliged to report under paragraph 4 of this Schedule and shall do so at least two months prior to the due date for publication of the Sustainability Report in any one year.



**SCHEDULE 6  
COMMUNITY FUND**

1. Having established the Community Fund prior to the Implementation Date, the Operator shall operate and shall maintain a Community Fund in the following manner:
  - (A) The Operator shall retain the Community Fund in an interest-bearing account previously approved by the Council;
  - (B) The Operator shall retain the Independent Body (or any future replacement independent body approved in writing by the Council) to administer the Community Fund and shall submit or procure submission by the approved Independent Body for the written approval of the Council the objectives of the Community Fund and the criteria against which applications for grants or other funding from the Community Fund shall be assessed;
  - (C) By 31 January in each year, the Operator shall pay into the bank account for the Community Fund a minimum of of £100,000 (one hundred thousand pounds) and shall provide the Council with evidence of the deposit of such sum in the bank account on or before 1 March in each relevant year Provided That the payments shall be in addition to any sums received by the Operator by way of payment under any sanctions imposed on airline operators for failure to act in accordance with noise, track-keeping or other operating requirements at the Airport pursuant to Schedule 1;
  - (D) The Operator shall publicise the availability of the Community Fund to communities in the Local Area;
  - (E) The Operator shall report annually on the amount of the expenditure from the Community Fund and the projects funded by the Community Fund as part of the Sustainability Report; and
  - (F) Any sums received by the Operator from airlines under the Track Violation Penalty System shall be paid by the Operator into the Community Fund.



**SCHEDULE 7  
MONITORING AND REPORTING**

1. By 30 June each year (Provided That the Council shall have first supplied all relevant data concerning surface access to the Airport and employment at the Airport which is within its control at least two months prior to the due date for publication of the Sustainability Report), the Operator shall submit to the Council the Sustainability Report which shall identify and assess the performance of the Airport in the preceding calendar year (January to December) against the information and requirements to include in particular those set out below:

(A) Noise:

- i. Annual average summer daytime and night-time noise contours;
- ii. Total number of aircraft movements;
- iii. Total number of night-time aircraft movements;
- iv. Adherence to noise limits and other controls;
- v. Complaints;
- vi. Use of a continuous descent approach;
- vii. Track keeping;
- viii. Number of breaches of noise limits or flying off-track;
- ix. Payments from the Noise Insulation Fund;
- x. Aircraft fleet mix.

(B) The operation of the Travel Plan or Updated Travel Plan (as applicable) and Updated Airport Surface Access Strategy (as required pursuant to Schedule 2 of this Agreement and otherwise as provided for in this paragraph):

- i. Overall numbers of commercial air passengers using the Airport;
- ii. Numbers and percentages of (i) staff and (ii) passengers travelling by car, bus, train and other modes of transport;
- iii. Assessment of the need for traffic counting equipment at road junctions and links on the approaches to the Airport and provision for a contribution by the Operator towards the cost of installing such equipment (if any);
- iv. Usage of the short-term, mid-term and long-term public car parks under the Operator's control including drop-off / 'kiss-and-fly' facilities including performance against any relevant measures in the car park management plan;
- v. Usage of staff car parking under the Operator's control;
- vi. Passenger journeys by time of day;
- vii. Passenger mode shares;
- viii. Passenger catchment area;
- ix. Passenger car and taxi use;
- x. Staff journeys by time of day;
- xi. Staff mode shares;
- xii. Staff catchment area;
- xiii. The activities of the Transport Forum and any other associated groups or forums relevant to surface access;
- xiv. Performance against actions and targets contained in the Travel Plan or Updated Travel Plan (as applicable).



- (C) Sustainability:
    - i. As required by Schedule 4 the performance of the Airport against the targets in the Sustainability Strategy.
  - (D) Carbon Reduction Strategy:
    - i. As required by Schedule 4 the performance of the Airport against the targets in the Carbon Reduction Strategy;
    - ii. Details of verification and audit of the Carbon Reduction Strategy by the Airports Carbon Accreditation Scheme as required by the Section 73 Planning Permission.
  - (E) The effectiveness of the Employment Skills and Recruitment Plan and the Local Procurement Protocol as required by Schedule 5.
2. The Operator will publish the Sustainability Report on its website and provide copies of the Sustainability Report to each member of LLACC by 30 June in each calendar year when it has been submitted to the Council.
  3. In each calendar year the Operator shall submit to the Council the Quarterly Flight Operations Report on or before each of the following dates:
    - (A) 1 June in respect of the quarter year from 1 January to 31 March;
    - (B) 1 September in respect of the quarter year from 1 April to 30 June;
    - (C) 1 December in respect of the quarter year from 1 July to 30 September;
    - (D) 1 March in respect of the quarter year from 1 October to 31 December.
  4. The Quarterly Flight Operations Report shall include details of the following matters for the preceding quarter:
    - (A) the aggregate number of aircraft movements at the Airport in each month;
    - (B) the aggregate number of air passengers using the Airport in each month;
    - (C) instances (if any) where daytime Noise Violation Limits have been breached;
    - (D) instances (if any) where night-time Noise Violation Limits have been breached;
    - (E) quarterly average night-time airborne noise contours;
    - (F) the number of night-time aircraft movements;
    - (G) performance against the Quota Count System including the limits for the night quota period which forms part of the Quota Count System;
    - (H) track keeping violations;
    - (I) any biodiversity monitoring including surveys and mitigation measures undertaken as part of the Sustainability Strategy.
  5. The Council covenants with the Owner and the Operator to provide all data within its control which may be relevant to the matters on which the Operator is obliged to report under this Schedule and shall do so at least two months prior to the due date for publication of the Sustainability Report in any one year.

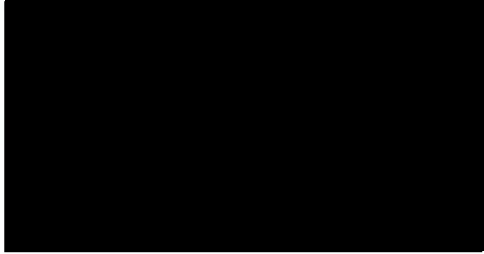


**SCHEDULE 8  
MONITORING FUND**

1. On the Implementation Date, the operator shall pay to the Council the Initial Monitoring Fund.
2. By 1 January in each year following payment of the Initial Monitoring Fund, the Council shall provide the Operator with a written account of the expenditure and committed expenditure (if any) since 31 January of the preceding year of the sums received from the Operator pursuant to paragraph 1 of this Schedule and in that account the Council shall state the balance of such sums which it has available for future expenditure.
3. On or before 31 January in each subsequent year following payment of the Initial Monitoring Fund, the Operator shall pay to the Council such additional sum as is required to restore the balance of the Initial Monitoring Fund to £70,000 Index Linked.



THE COMMON SEAL of  
LUTON BOROUGH COUNCIL  
was affixed in the presence of



DEV Management Centre 5022
7139
SS

EXECUTED as a DEED by  
LONDON LUTON AIRPORT  
OPERATIONS LIMITED

acting by.....  
in the presence of:

.....  
Director

Signature of witness

.....

Name of witness  
(in BLOCK CAPITALS)

Address of witness

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THE COMMON SEAL of )  
LUTON BOROUGH COUNCIL )  
was affixed in the presence of )

Authorised signatory

Authorised signatory

EXECUTED as a DEED by )  
LONDON LUTON AIRPORT )  
OPERATIONS LIMITED )

acting by Alberto Martin )  
in the presence of: )

Signature of witness

Name of witness  
(in BLOCK CAPITALS)

MEE-LING SKEFFINGTON

Address of witness





**EXECUTED as a DEED by  
LONDON LUTON AIRPORT LIMITED**

acting by.....  
in the presence of:

.....  
Director

Signature of witness

.....

Name of witness  
(in BLOCK CAPITALS)

Address of witness

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**EXECUTED and DELIVERED as a  
DEED by  
NATWEST MARKETS PLC**

acting by *NAVEED RANA*  
in the presence of:

.....  
Director  
*Authorised Signatory*

Signature of witness

.....

Name of witness  
(in BLOCK CAPITALS)

*SAIEMA SULTAN*  
.....  
Address of witness

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**ANNEXURE 1  
NOISE MANAGEMENT PLAN**



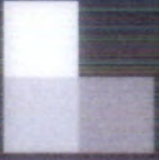
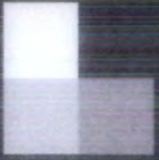


## **Appendix 1**

**Application No: 21/00031/VARCON**

**The Noise Management Plan**





London

Luton



Airport

# 2022 NOISE MANAGEMENT PLAN

## Technical Document



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## 1. BACKGROUND TO THIS NOISE MANAGEMENT PLAN

- 1.1 On 23 June 2014 planning permission was granted by Luton Borough Council (LBC) for the expansion of London Luton Airport (ref: 12/01400/FUL), including amongst other things an extension of the terminal building, a new passenger pier, a multi-storey car park, dualling of Airport Way, alterations of taxiways and stands, and an increase in passenger numbers to 18 million passengers per annum (mppa).
- 1.2 The planning permission was subject to a number of conditions, including four relating to noise (conditions 11 (Noise Control Scheme), 12 (noise contour thresholds), 13 (Noise Control Monitoring Scheme) and 14 (Ground Noise Control Scheme)), together with a legal agreement under Section 106 of the Town and Country Planning Act 1990 ("TCPA").
- 1.3 On 4 December 2014 London Luton Airport Operations Limited (LLAOL) submitted an application pursuant to the abovementioned noise conditions (ref: 14/01519/DOC). On 2 March 2015 Luton Borough Council approved the submitted details and the current noise management system for London Luton Airport was established.
- 1.4 On 13 October 2017 a subsequent planning permission pursuant to section 73 of the TCPA was granted which varied noise condition 11(i) (ref: 15/00950/VARCON). The abovementioned noise conditions were restated on this permission as there were ongoing compliance elements to them but they were amended to reflect that the details had already been approved. The condition numbering also changed, since it was not necessary to repeat all conditions associated with the original permission, thus the noise conditions became conditions 9 (Noise Control Scheme), 10 (noise contour thresholds), 11 (Noise Control Monitoring Scheme) and 12 (Ground Noise Control Scheme). The Section 106 Agreement entered into in connection with this permission incorporated (at Annex 1) the document that had been approved pursuant to the abovementioned noise conditions and which was termed the noise management plan. As a result there was some overlap and required read-across between the noise conditions and the Section 106 Agreement.
- 1.5 In January 2021, LLAOL submitted an application pursuant to section 73 of the TCPA to increase the passenger cap (condition 8) and to vary the area covered by the summer noise contours (condition 10), as well as consequential variations to conditions 22 (car parking management), 24 (travel plan) and 28 (approved plans and documents) (ref: 21/00031/VARCON). Luton Borough Council resolved to grant this permission subject to ensuring that the terms of the Section 106 Agreement continued to apply, with necessary amendments. The Secretary of State for Levelling Up, Housing and Communities by a letter

dated 6 April 2022 to Luton Borough Council called in the application and on 11 May 2022 the Secretary of State for Transport confirmed that the application would be determined jointly by the two Secretaries of State.

- 1.6 In settling the terms of the Section 106 Agreement prior to the start of the inquiry, it was agreed between LLAOL and LBC that in order to make the noise controls simpler to understand, and to avoid the required read-across between the noise conditions and the Section 106 Agreement, it was considered appropriate to compile all the controls into this one Noise Management Plan.
- 1.7 This Noise Management Plan therefore brings into one single control document the following schemes, plans and systems:
  - the Residential Noise Insulation Scheme (section 3 of this NMP);
  - the Non-Residential Noise Insulation Scheme (section 4 of this NMP);
  - the Noise Control Scheme (originally approved under condition 11 of the original permission and secured under condition 9 of the 2017 permission) (section 5 of this NMP);
  - the Noise Control Monitoring Scheme (originally approved under condition 13 of the original permission and secured under condition 11 of the 2017 permission) (section 7 of this NMP);
  - the Ground Noise Control Scheme (originally approved under condition 14 of the original permission and secured under condition 12 of the 2017 permission) (section 8 of this NMP); and
  - details of the noise violation limits/track violations sanction/fine system (originally approved under condition 11 of the original permission and secured under condition 9 of the 2017 permission but now included as a separate section of this NMP (section 9 of this NMP).
- 1.8 The Section 106 Agreement sets out details of the Noise Insulation Fund (Sch. 1, para. 1.12), the operation of the London Luton Airport Consultative Committee (LLACC) (Sch. 3), and the review process for the Noise Management Plan (Sch. 1, para. 1.2).
- 1.9 The noise contour thresholds (condition 10 in the 2017 permission) will continue to be principally controlled in the planning permission but section 6 of this NMP provides detail on how performance against the noise contour thresholds is monitored and reported on.



2. **OTHER NOISE CONTROLS**

2.1 Separate to these matters, London Luton Airport (the Airport) operates in accordance with The Environmental Noise (England) Regulations 2006 and has a Noise Action Plan (NAP) approved by Department for Transport (DfT) and Department for Environment Food and Rural Affairs (Defra). The current approved NAP includes noise related measures which form part of the overall noise strategy. The Airport also operates in accordance with the Luton Byelaws approved by the Secretary of State for Transport (Appendix 1).

3. **RESIDENTIAL NOISE INSULATION SCHEME**

3.1.1 This scheme provides noise insulation works to residential buildings that meet the Residential Noise Insulation Eligibility Criteria and have not previously been treated by the Airport. The residential eligibility criteria are any of the following detailed below.

3.1.2 The eligibility criteria will be based on the forecast 2023 noise contour as specified in the Application (ref. 21/00031/VARCON) and will be fixed for a period of five years from that year (i.e. until 31 December 2028) following which the eligibility will revert to actual aircraft movements at the Airport for the summer period (16<sup>th</sup> June to 15<sup>th</sup> September) in the immediately preceding calendar year. This will be determined as part of the noise monitoring system on an annual basis in accordance with the following criteria:

(A) Airborne Aircraft Noise

- (1) Any habitable rooms at dwellings within the 63 dB  $L_{Aeq,16h}$  on an annual basis.
- (2) Any habitable rooms which are used as bedrooms at dwellings within the 55 dB  $L_{Aeq,8h}$
- (3) Any habitable rooms which are used as bedrooms at dwellings where the airborne noise level in excess of 90 dB SEL occurs at an annual average frequency of once or greater during the night-time (23.00 to 07.00).

(B) Ground Noise

- (1) Any habitable rooms at dwellings which are exposed to a free field noise level in excess of 55 dB  $L_{Aeq,16h}$  daytime (07.00-23.00)

- (2) Any habitable rooms which are used as bedrooms at dwellings which are exposed to a free field noise level in excess of 45 dB LAeq,8h night-time (23.00-07.00)
- (C) Traffic Noise
- (1) Any habitable rooms at dwellings with a façade incident noise level in excess of 66 dB LAeq,16h daytime (07.00 to 23.00); and
  - (2) Which are subject to the predicted Road Traffic Noise Increase of not less than 1 dB as a result of the Development which for the avoidance of doubt has been identified in Plan 2 of the settled Section 106 Agreement.

This will be determined on a biennial basis. Current predictions indicate no eligibility will arise for many years as the traffic related to the Development forms only a minor element of road traffic flows on nearby roads.

3.1.3 LLAOL will assess the noise related to the Airport and determine the residential properties eligible in accordance with the criteria noted above. LLAOL will notify the scheme administrator, the independent London Luton Airport Consultative Committee (LLACC), who will determine at the beginning of each year the properties they wish to prioritize for sound insulation works in the coming year. LLAOL shall provide any necessary support and assistance reasonably requested by LLACC with the administration of the Residential Noise Insulation scheme.

3.1.4 The prioritisation is necessary as the scheme is based on a continuous annual program, allowing the properties deemed most in need to be treated first, with further properties treated in future years. It will involve considering the eligibility based on the criteria detailed above, daytime and night-time noise from airborne aircraft, ground operations noise, and road traffic noise, with any special circumstances. These could include the nature of specific properties or the specific residents, for example night workers, those needing a particularly quiet home environment to work in, or those that have a medical condition which will be seriously aggravated by noise. On resolution of the eligible properties to be considered for works, LLAOL will write to the residential property owners to establish whether the owners wish to accept the works. On the basis that the owner wishes to proceed, the scheme process will be implemented. If the owner does not wish to proceed at this stage, no further approaches will be made for a



five-year period. If after five years the owner decides to proceed, the scheme will be implemented by LLAOL and works undertaken by a contractor appointed by LLAOL after discussion with LLACC. If after five years the owner decides again not to proceed, no further approaches will be made. If any eligible property that has declined the offer twice approaches LLAOL asking for insulation then such request will be taken to the London Luton Airport Noise Insulation Sub-Committee (part of LLACC) for consideration.

- 3.1.5 The scheme will provide a grant of up to the value of £4,500 (index-linked<sup>1</sup>) per eligible property, in order that noise insulation can be provided to up to five habitable rooms. The rooms excluded are non-habitable rooms, for example hallways, bathrooms and kitchens, although kitchen dining rooms shall be considered as habitable rooms. In exceptional circumstances, as deemed appropriate by LLAOL, higher grants may be available.
- 3.1.6 Grants paid pursuant to this scheme can only be used for works that will improve the internal noise climate within the residential property. The primary method of improving sound insulation is the installation of secondary glazing. Secondary glazing units provide an additional layer of glass inside the existing external windows. The style of secondary glazing units fitted will be dependent on the existing external window. The design will be such that both sides of the secondary glazing and the inside of the existing window can be cleaned from inside the habitable room.
- 3.1.7 Grants may also be used to assist in installation of High-Specification Double Glazed replacement windows, with a glazing specification of 10/12/6.4 acoustic laminate or similar.
- 3.1.8 Where glazing works are undertaken it will be necessary to install sound attenuated ventilation units to provide background ventilation and these would normally be fitted to external walls.
- 3.1.9 The works can also include the installation of High-Specification Double Glazed replacement windows with sound attenuated trickle vents.
- 3.1.10 The works can also include installation of loft insulation.

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<sup>1</sup> Indexation is to be calculated in accordance with the definition of "Index Linked" in the Section 106 Agreement to which this NMP is annexed.

- 3.1.11 The works can provide funds for installation of blinds between the primary and secondary glazing for secondary glazed windows that face south.
- 3.1.12 Where treated habitable rooms have an external door, the works can provide improved sound insulating external doors.
- 3.1.13 Excluded from this scheme are residential properties built after the date of the grant of the original planning permission ref: 12/01400/FUL, namely 23 June 2014 unless such properties would fall within the new SOAEL as assessed under planning permission ref. 21/00031/VARCON.
- 3.1.14 The scheme will be advertised on the Airport's website, and that of the LLACC. The advertisement will describe the scheme, and clarify that eligible property owners will be approached, and so application to LLAOL will not be required.

#### 4. **NON - RESIDENTIAL NOISE INSULATION SCHEME**

- 4.1.1 This scheme provides noise insulation works to non-residential buildings that meet the Non-Residential Noise Insulation Eligibility Criteria. Where acoustic insulation cannot provide an appropriate or cost-effective solution, alternative mitigation measures will be considered. Non-residential buildings relate to:
  - (A) Schools and colleges.
  - (B) Doctor's surgeries, health centres, hospitals, nursing homes and care homes;
  - (C) Libraries, community centres (unless only used as social clubs), meeting halls and village halls;
  - (D) Churches and other places of religious worship;
  - (E) Children's and other day centres, crèches and nurseries;
  - (F) Any other types of public building as agreed between Luton Airport and LBC.
- 4.1.2 The eligibility criteria will be based on the forecast 2023 noise contour as specified in the Application (ref: 21/0031/VARCON) and will be fixed for a period of five years from that year (i.e. until 31 December 2028) following which the eligibility will revert to actual aircraft movements at the Airport for the summer period (16<sup>th</sup> June to 15<sup>th</sup> September) in the immediately preceding calendar year. This will be determined as part of the Noise monitoring system on an annual basis in accordance with the following criteria:.



#### 4.1.3 Airborne Aircraft Noise

- (A) Any noise sensitive rooms<sup>2</sup> within non-residential buildings within the 63 dB LAeq,16h summer daytime (07.00-23.00)
- (B) Any noise sensitive rooms which are used at night within non-residential buildings within the 55 dB LAeq,8h summer night-time (23.00-07.00)

4.1.4 LLAOL will assess the noise related to the Airport, and determine the non-residential properties eligible on the basis of the criteria noted above. LLAOL will notify the scheme administrator, the LLACC, and request that they determine which properties they wish to prioritize for sound insulation works. LLAOL shall provide any necessary support and assistance reasonably requested by LLACC with the administration of the Non-Residential Noise Insulation Scheme.

4.1.5 On resolution of the eligible properties to be considered for works, LLAOL will write to the property owners to establish whether the owners wish to accept the works. On the basis that the owner wishes to proceed, the scheme process will be implemented. If the owner does not wish to proceed at this stage, no further approaches will be made for a five-year period. If after five years the owner decides to proceed, the scheme will be implemented by LLAOL and works undertaken by the contractor appointed by LLAOL after discussion with LLACC. If after 5 years the owner decides again not to proceed, no further approaches will be made.

4.1.6 The scheme will provide a grant as appropriate in order that noise insulation can be provided.

4.1.7 The primary method of improving sound insulation is the installation of secondary glazing. Secondary glazing units provide an additional layer of glass inside the existing external window. The style of secondary glazing units fitted will be dependent on the existing external window. The design will be such that both sides of the secondary glazing and the inside of the existing window can be cleaned from inside the treated room.

4.1.8 Grants may also be used to assist in installation of Double-Glazed replacement windows.

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<sup>2</sup> For example, areas where people spend most time, so in the case of a school the classrooms would be noise-sensitive but a cleaning cupboard would not be.

- 4.1.9 Where glazing works are undertaken it may also be necessary to install sound attenuated ventilation units. These will provide background ventilation and would normally be fitted to external walls.
- 4.1.10 The works can also include the installation of High-Specification Double Glazed replacement windows with sound attenuated trickle vents.
- 4.1.11 The works can also include installation of loft insulation.
- 4.1.12 The works can provide funds for installation of blinds between the primary and secondary glazing for secondary glazed windows that face south.
- 4.1.13 Where treated rooms have an external door, the works can provide improved sound insulating external doors.
- 4.1.14 Excluded from this scheme are non-residential properties built after the date of the grant of the original planning permission ref: 12/01400/FUL, namely 23 June 2014, unless such properties would fall within the new SOAEL as assessed under planning permission ref. 21/00031/VARCON.
- 4.1.15 The scheme will be advertised on the Airport's website, and that of the LLACC. The advertisement will describe the Scheme, and clarify that eligible property owners will be approached, and so application to LLAOL will not be required.

## 5. NOISE CONTROL SCHEME

### 5.1.1 Luton's Noise Quota System

- (A) LLAOL will continue to operate a Quota Count System (QC system) based on the Noise Quota System utilised by other UK airports, including Heathrow Airport, or such other methodology to apply QC values for individual aircraft types to be agreed with the Council. The Noise Quota System at the other London Area Airports is promulgated in supplements to the Civil Aviation Authority's Aeronautical Information Publication (AIP). The most recent supplement detailing the Noise Quota System *London Heathrow, London Gatwick and London Stansted Airports Noise Restrictions Notice (No. 2) 2022* was published 22 September 2022 and includes information on the QC values for various aircraft types. The QC system is updated from time to time as new information obtained during the aircraft's noise certification process becomes available. Since 2017 the



supplement has included a new category of QC 0.125, and the Exempt category has been replaced with a new category of QC 0.

- (B) The Luton System is required to assign to each aircraft operation by a Luton aircraft a QC value. Those values combined with the number of annual movements will be used to determine the annual quota used, which will be compared with the annual budget limit of 3,500. The Luton System also imposes restrictions on usage of aircraft based on their QC value and provides information that is used when the noise levels at the Airport's fixed monitors are reviewed.

## 5.2 London Luton Airport Noise Quota System (LLANQS)

### 5.3 Citation and Commencement

- 5.3.1 The LLANQS may be cited as the LLANQS, and came into operation following the commencement of development in June 2014.

### 5.4 Interpretation

- 5.4.1 For the purposes of this System

'the Act' means the Civil Aviation Act 1982;

'airport authority' means the person for the time being having the management of Luton Airport as applicable;

'Annex 16' means Annex 16 (Volume 1 – Aircraft Noise) to the Convention on International Civil Aviation signed on behalf of the United Kingdom at Chicago on 7 December 1944<sup>1</sup>;

'appropriate air traffic control unit', has the meaning ascribed to it by the Air Navigation Order 2009<sup>2</sup>;

'maximum certificated landing weight' means the maximum landing weight authorised in the certificate of airworthiness;

'maximum certificated take-off-weight' means the maximum take-off weight authorised in the certificate of airworthiness;

'night period' means the period from 23.00 hours to 07.00 hours (Local time);

'night quota period' means the period from 23.30 hours to 06.00 hours (Local time)<sup>3</sup>;

'noise classification' means the noise level band in EPNdB, for take-off or landing, as the case may be, for the aircraft in question, as determined from the individual aircraft's noise certification form coupled with The Schedule of the System.

'quota' means the maximum permitted sum of the quota counts of all aircraft taking off from or landing at the Airport during any twelve months in the night quota period;

'quota count' means the amount of the quota assigned to one take-off or to one landing by the aircraft in question, this number being related to its noise classification as specified in paragraph 5.5.3 of this system.

References in this system to a moment in time are to Local Time, that is in any period of summertime, to the time fixed by the Summer Time Act 1972, and outside that period to Universal Co-ordinated Time.

## 5.5 Description of Aircraft

5.5.1 Aircraft taking off or landing at Luton Airport are described in this system as follows:

- (A) Aircraft having a quota count of 0;
- (B) Aircraft having a quota count of 0.125;
- (C) Aircraft having a quota count of 0.25;
- (D) Aircraft having a quota count of 0.5;
- (E) Aircraft having a quota count of 1;
- (F) Aircraft having a quota count of 2;
- (G) Aircraft having a quota count of 4;
- (H) Aircraft having a quota count of 8;
- (I) Aircraft having a quota count of 16.

5.5.2 The provisions of this section do not apply to light propeller-driven aircraft with a maximum certificated take-off weight not exceeding 8,618 KG, and which are being utilised to undertake essential airport safety checks.

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<sup>3</sup> an aircraft is deemed to have taken off or landed during the night period or night quota period, as the case may be, if the time recorded by the appropriate air traffic control unit 'airborne' or 'landed' respectively falls within that period



- 5.5.3 Subject to paragraph 5.5.2, the quota count of an aircraft on taking off or landing is to be calculated on the basis of the noise classification for that aircraft on take-off or landing as appropriate as follows:

Noise Classification	Quota Count
<81 EPNdB	0
81-83.9 EPNdB	0.125
84-86.9 EPNdB	0.25
87-89.9 EPNdB	0.5
90-92.9 EPNdB	1
93-95.9 EPNdB	2
96-98.9 EPNdB	4
99-101.9 EPNdB	8
Greater than 101.9 EPNdB	16

## 5.6 Prohibitions on taking off or landing

- 5.6.1 Subject to paragraphs 5.12-5.13.1, at Luton Airport:
- (A) any aircraft which has a quota count of 2, 4, 8 or 16 may not take-off or land during the night period;
- 5.6.2 Subject to paragraph 5.12, at Luton Airport an aircraft may not take-off or be scheduled to land during the night period where:
- (A) the operator of that aircraft has not provided (prior to its take-off or prior to its scheduled landing time as appropriate) sufficient information to enable the airport authority to verify its noise classification and thereby its quota count; or
- (B) the operator claims that the aircraft has a QC of 0 within paragraph 5.5.1(A), but the aircraft is not indicated as such an aircraft in Part 2 of the

Schedule to the UK AIP Supplement on Noise Restrictions at other London Area Airports.

**5.7 Maximum number of occasions on which aircraft may take-off or land**

- 5.7.1 Subject to paragraphs 5.9-5.12.1, the overall maximum number of occasions on which aircraft of the descriptions specified in paragraphs 5.5.1(B) to 5.5.1(E) inclusive may take-off or land during the night quota period in any twelve month period is at Luton Airport: 9650.
- 5.7.2 Subject to paragraphs 5.9-5.12.1, the overall maximum number of occasions on which aircraft of the descriptions specified in paragraphs 5.5.1(B) to 5.5.1(E) inclusive may take-off or land during the early morning shoulder period (06:00-07:00hrs) in any twelve-month period at Luton Airport is: 7,000.
- 5.7.3 Subject to paragraphs 5.8-5.12.1, in the night quota period in the specified twelve month period the quota is at Luton Airport: 3500. This shall be reduced at each review until it reaches a point where it does not exceed 2,800 by 2028.
- 5.7.4 Subject to paragraphs 5.10 – 5.12.1, each take-off or landing by an aircraft at Luton Airport during each night quota period within the twelve month period is to count according to its quota count towards the relevant quota.

**5.8 Carry-over from the specified twelve-month period**

- 5.8.1 If the number of occasions on which aircraft of the descriptions specified in paragraphs 5.5.1(B) to 5.5.1(E) inclusive take-off or land at Luton Airport during the previous period is less than the maximum number of occasions specified in paragraph 5.7.1, the maximum number of occasions on which such aircraft may take-off or land at that aerodrome during the specified period may be supplemented by a number of occasions equal to the shortfall, up to a maximum of 10% of the maximum number of occasions specified in paragraph 5.7.1.
- 5.8.2 If any part of the quota specified in paragraph 5.7.1 remains unused at the end of the previous specified period, the quota for the specified period at Luton Airport may be supplemented by a sum of quota counts equal to the remainder, up to a maximum of 10% of the quota specified in paragraph 5.7.1.



**5.9 Overrun of movements in the specified twelve-month period**

5.9.1 If, in respect of Luton Airport, the sum of the maximum number of occasions specified in paragraph 5.7.1 has been exceeded during the previous specified period:

- (A) by up to 10% of the number of occasions specified in paragraph 5.7.1, the maximum number of occasions on which aircraft of the descriptions specified in paragraphs 5.5.1(B) to 5.5.1(E) inclusive may take-off or land during the specified period at Luton Airport is to be reduced by the same amount; or
- (B) by more than 10% of the number of occasions specified in paragraph 5.7.1, the maximum number of occasions on which aircraft of the descriptions specified in paragraphs 5.5.1(B) to 5.5.1(E) inclusive may take-off or land during the specified period at Luton Airport is to be reduced by the amount of the excess up to 10% plus twice the amount of the excess over 10%.

**5.10 Overrun of the quota limits in the previous specified period**

5.10.1 If, in respect of Luton Airport, the sum of the quota specified in paragraph 5.7.2 has been exceeded during the previous specified period:

- (A) by up to 10% of the quota specified in paragraph 5.7.2, the quota for the specified period at the Luton Airport is to be reduced by the same amount; or
- (B) by more than 10% of the quota specified in paragraph 5.7.2, the quota for the specified period at Luton Airport is to be reduced by the amount of the excess up to 10% plus twice the amount of the excess over 10%.

**5.11 Limits to overrun in the specified period**

5.11.1 The sum of the maximum number of occasions specified in paragraph 5.7.1 for Luton Airport and any supplementary number of occasions permitted by paragraph 5.8.1 must not be exceeded by more than 10% of the number of occasions specified in paragraph 5.7.1.

5.11.2 The sum of the quota specified in paragraph 5.7.2 for Luton Airport must not be exceeded by more than 10% of the quota specified in paragraph 5.7.2.

## 5.12 Disregarded movements

5.12.1 For the purposes of Section 78(4)(a) of the Act, the following circumstances are specified in relation to the taking off and landing of aircraft at Luton Airport, namely:

- (A) delays to aircraft which are likely to lead to serious congestion at the aerodrome or serious hardship or suffering to passengers or animals;
- (B) delays to aircraft resulting from widespread and prolonged disruption of air traffic.

## 5.13 Exclusion from the provisions of this System for emergency take-offs or landings

5.13.1 None of the provisions of this System apply to a take-off or landing which is made in an emergency consisting of an immediate danger to life or health, whether human or animal.

## 5.14 The Schedule

5.14.1 The noise classification for an aircraft on take-off or landing as appropriate means for the purpose of landing:

- (A) in the case of an aircraft certified to the standards of Chapters 2, 3, 4, 5 or 14 of Annex 16 (or the equivalent standards), the certificated approach noise level of the aircraft at its maximum certificated landing weight minus 9 EPNdB; and
- (B) in the case of a propeller aircraft with a maximum take-off weight not exceeding 5,700 kg and any other aircraft not certificated to the standards of Chapter 2, 3, 4, 5 or 14 of Annex 16 (or the equivalent standards): the noise level indicated in relation to that aircraft in the noise data supplied for this purpose to the CAA.

5.14.2 For the purposes of take-off:

- (A) where the aircraft is certificated to the standards of Chapter 3, 4, 5 or 14 of Annex 16 (or the equivalent standards): half the sum of the flyover and the sideline noise levels in EPNdB as measured at the certification points



specified in that Annex during the noise certification of the aircraft at its maximum certificated take-off weight;

- (B) where the aircraft is certified to the standards of Chapter 2 of Annex 16 (or the equivalent standards): half the sum of the flyover and the sideline noise levels in EPNdB as measured at the certification points specified in that Annex during the noise certification of the aircraft at its maximum certificated take-off weight, plus 1.75 EPNdB; and
- (C) where the aircraft is a propeller aircraft with a maximum take-off weight not exceeding 5.700 kg or any other aircraft not certified to the standards of Chapter 2, 3 or 5 of Annex 16 (or the equivalent standards): the noise levels indicated in relation to that aircraft in the noise data supplied for this purpose to the CAA.

5.14.3 Luton Airport will operate the system delineated above and will apply sanctions in relation to operators of aircraft which land or take-off in breach of the LLANQS. The operation of the LLANQS, including movement and quota totals, will be reported within Luton Airport's Quarterly Flight Operations Reports (QFOR) and Sustainability Reports (SR).

#### 5.15 **Quarterly Flight Operations Report (1st March/1st June/1st September/1st December)**

5.15.1 The QFORs have included for many years (and shall continue to include), details of monthly movements, monthly passengers, runway usage, departure route usage, arrival details including Continuous Descent Approach (CDA) usage, measured departure noise levels, details of any noise violations, track violations, complaint statistics and analysis, and quarterly night noise contours. Following the grant of the original planning permission (LBC ref: 12/01400/FUL) the QFORs have also been required to include:-

- (A) Actual Total Number of Aircraft Movements for the preceding 12 month period, and a breakdown of monthly totals;
  - (1) For the time 00.00 to 24.00 hrs (Overall)
  - (2) For the time 23.30 to 06.00 hrs (Night Quota Period)
  - (3) For the time 06.00 to 07.00 hrs (Early Morning Shoulder Period)

- (B) Actual Total Noise Quota Usage for the preceding 12 month period, and a breakdown of monthly totals.
- (C) Forecast Total Number of Aircraft Movements in the following 12 month period;
  - (1) For the time 07.00 to 23.00 hrs (Day period)
  - (2) For the time 23.00 to 07.00 hrs (Night period)
- (D) Instances where daytime and night-time Noise Violation Limits (NVL) have been breached, if any. (Already reported in QFORs and SR).
- (E) Instances where Track Violation Limits have been breached, if any.

5.15.2 The future commercial schedules become available for the summer and winter scheduling periods at different times and therefore forecast movements can only be approximately estimated.

#### 5.16 Sustainability Report (30<sup>th</sup> June)

5.16.1 The SRs have included for many years, detailed information on aircraft movements, aircraft fleets, runway usage, CDA usage, track-keeping, noise monitoring, noise contours, complaints, employment, surface access and planning. The contents and format of the SR has been resolved between Luton Airport and the Airport's independent consultative committee, LLACC. Following the grant of the original planning permission (LBC ref: 12/01400/FUL) the SR has also been required to include:-

- (A) For preceding year total aircraft movements;
  - (1) for 23.30 to 06.00 Night Quota Period
  - (2) for 06.00 to 07.00 Early Morning Shoulder Period.
- (B) Actual Annual Movements of;
  - (1) Marginally compliant Chapter 3 aircraft (00.00-24.00)
- (C) Forecast total aircraft movements;
  - (1) Summer Period Daytime Period : 07.00-23.00
  - (2) Summer Period Night-time Period: 23.00-07.00
  - (3) Annual Night quota Period: 23.30-06.00
  - (4) Early Morning Shoulder Period: 06.00-07.00



- (D) Actual QC Annual Usage: 23.30-06.00
- (E) Forecast QC Annual Usage: 23.30-06.00
- (F) Actual Noise contours for the Day and Night Period for the preceding summer 92 day period, and details of contour areas and populations within contours.
- (G) Breaches of noise limits or flying off-track.
- (H) Payments from the Noise Insulation Fund.

#### 5.17 **Prohibition of QC 2 operations [23:00 – 07:00]**

5.17.1 Since 2018 LLAOL has phased out aircraft operations in the night period, 2300-0700, by aircraft with a QC value of greater than 1. Aircraft operations involving aircraft with a QC value of greater than 1 will not be permitted during the night period.

### 6. **MONITORING AND REPORTING IN CONNECTION WITH CONDITION 8<sup>4</sup> (NOISE CONTOUR THRESHOLDS)**

#### 6.1 **Noise Contouring**

6.1.1 In connection with planning condition 8 (noise contour thresholds), LLAOL will continue to provide on the 1st December of each calendar year the information listed below:

- (A) LAeq,16h noise exposure contours for an average summer day for the 16 hour period (07.00 to 23.00 local time, equivalent to 06.00 to 22.00 GMT in the summer period) commencing at 57 dB(A) and showing increasing values in 3 dB(A) steps for the following cases:
  - (1) The current year based on actual ATM data;
  - (2) The following year based on predicted ATM data.
- (B) LAeq,8h noise exposure contours for an average summer night for the 8 hour period (23.00 to 07.00 local time, equivalent to 22.00 to 06.00 GMT in

<sup>4</sup> Reference to condition 8 in this document is to the condition on the S73 planning permission ref. 21/00031/VARCON which, amongst other things, sets the contour limits. Should the final condition numbering be different on the Secretary of States' Decision Letter, references to condition 8 should be read as the relevant condition which sets the contour limits and upon review of this NMP in accordance with the S106 requirements. references to condition 8 should be replaced with the correct condition number.

the summer period) commencing at 48 dB(A) and showing increasing values in 3 dB(A) steps for the following cases:

- (1) The current year based on actual ATM data;
- (2) The following year based on predicted ATM data.

- 6.1.2 For the period up to 31 December 2027, for each of the cases described above, LLAOL will provide to LBC a comparison of the area enclosed within the 57 dB  $L_{Aeq,16h}$  daytime contours with the value of 21.1 sq km respectively and a comparison of the area within the 48 dB  $L_{Aeq,8h}$  night time contours with the value of 42.1 sq km.
- 6.1.3 For the period from 1 January 2028 to 31 December 2030, for each of the cases described above, LLAOL will provide to LBC a comparison of the area enclosed within the 57 dB  $L_{Aeq,16h}$  daytime contours with the value of 15.5 sq km respectively and a comparison of the area within the 48 dB  $L_{Aeq,8h}$  night time contours with the value of 35.5 sq km.
- 6.1.4 For the period from 1 January 2031, for each of the cases described above, LLAOL will provide to LBC a comparison of the area enclosed within the 57 dB  $L_{Aeq,16h}$  daytime contours with the value of 15.1 sq km respectively and a comparison of the area within the 48 dB  $L_{Aeq,8h}$  night time contours with the value of 31.6 sq km.
- 6.1.5 An evaluation of the results, including a description of any trends and the identification of any relevant features which have affected the results, will be provided to LBC.
- 6.1.6 The above contours will be calculated using the Federal Aviation Authority Integrated Noise Model version 7.0d (as may be updated or amended from time to time);
- 6.1.7 In determining the modal split for the average day or night, two cases will be used: (1) the actual percentage of westerly and easterly operations for the current summer period and (2) for the purpose of assessing compliance with the contour area limits in Condition 8 the modal split shall be 78% westerly 22% easterly.
- 6.1.8 The above information will be contained in a report to be submitted by LLAOL to LBC each year, detailing the forecast aircraft movements, consequential noise contours, and noise quota usage for the forthcoming calendar year. The movements and contours relate to the forecast activity in the 92 day summer period, 15th June-16th



September for the forthcoming year. The quota usage relates to the annual usage in the forthcoming calendar year.

- 6.1.9 With respect to “trends” and “relevant features” identified in the annual reports, LLAOL will study any adverse trends or features and seek to establish causes, and will set out in a Contour Action Plan what actions will be taken by LLAOL or airlines to avoid repetition. The Contour Action Plan should be prepared and agreed within [6 weeks] of LLAOL notifying LBC of any potential exceedances of the noise contours. Once agreed, the Contour Action Plan will be publicised by LBC and LLAOL will provide regular updates on the effectiveness of the measures being taken until the adverse trends and features are no longer predicted. Actions could include detailed operational decisions which would be resolved at the regular “Flight Ops” Committee meetings.

## 6.2 Noise Contour Area Reduction Methodology

- 6.2.1 Prior to implementation of permission ref. 21/00031/VARCON, LLAOL will submit a report to LBC which will define methods to be used by LLAOL to reduce the area of the noise contours in accordance with the terms of condition 8 (as summarised above at 6.1.2-6.1.4).
- 6.2.2 The contour area reduction measures envisaged currently are the improved operational arrangements arising from the Future Airspace Strategy Implementation (FASI), improved operation arrangements arising from introduction of RNAV departure and arrival procedures for all routes, and the introduction of new quieter aircraft, such as the Airbus A320 NEO, Boeing 737 MAX, Boeing 787 etc. The effectiveness of these measures to achieve the target reductions by 2028 and 2031 will be addressed in the regular reviews of this NMP in accordance with the terms of the Section 106 Agreement.

## 7. NOISE CONTROL MONITORING SCHEME

### 7.1 Elements of Luton’s Overall Noise Management

- 7.1.1 LLAOL operates a sophisticated Aircraft Noise and Track Monitoring System. This System includes a network of three permanent noise monitors that measure the noise of individual aircraft movements, and the system is also directly connected to the air traffic control radar that collects aircraft flight tracks. This allows the

monitoring of tracks flown by departing aircraft from Luton Airport via a website 'Travis'.

## 7.2 Elements of Luton's Future Overall Noise Management

### Fixed Noise Monitoring

- 7.2.1 LLAOL will continue to maintain, calibrate, and operate the current Aircraft Noise and Track Monitoring System (as may be updated from time to time).
- 7.2.2 LLAOL will continue to carry out noise monitoring at the following locations:
  - (A) Pepsal End Farm, Pepsal End, Bedfordshire;
  - (B) Grove Farm, Slip End, Bedfordshire;
  - (C) Frogmore Bottom, Hertfordshire.
- 7.2.3 If these locations become unavailable or not appropriate alternative locations agreed with LBC.
- 7.2.4 Noise levels of departing aircraft passing in the vicinity of the noise monitors will be recorded and the results analysed, to establish the departure noise level in relation to the aircraft registration. Using the registration, the noise certification values for the aircraft will be obtained via the operator. This information will allow the QC value of the aircraft to be determined. ACL (the slot co-ordinator) will use this information to implement any restrictions on aircraft slots given at the airport.

## 7.3 Track Keeping System

- 7.3.1 LLAOL will continue to maintain and operate the current Aircraft Noise and Track Monitoring System (as may be updated from time to time). The equipment will continue to identify aircraft which will be deemed to have complied with the current Noise Preferential Routes (NPRs). In particular, it will identify aircraft that fly wholly within the Lateral Swathe (LS) of each Noise Preferential Route (NPR). LLAOL currently has in effect three LS for aircraft departing the Airport, which deal with traffic on the departure routes to Compton, Match and Olney.
- 7.3.2 The LS are defined from the centreline of the relevant NPR by the closest to the centre-line of a pair of lines either side, each diverging at an angle of 10 degrees from a point on the centre-line of the runway centre-line 2000m from the start of roll; and of a pair of parallel lines representing a distance of 1.5km either side of



the route centre-line. The NPRs and consequently the LS include curved sections representing turns.

7.3.3 Once aircraft have attained a certain altitude relevant to the NPR<sup>5</sup>, they will be no longer considered within the NPR. At that stage the aircraft may be directed by air traffic controllers onto a different heading, a process described often as “radar vectoring”. Aircraft may also be turned off the NPR earlier to fly outside the LS by air traffic control due to special requirements, such as storm clouds.

7.3.4 LLAOL will continue to maintain a Track Violation Penalty (TVP) System. That TVP System monitors all departures using sophisticated monitoring equipment. The observed radar tracks will be assessed against the Lateral Swathes of the NPRs, and where the aircraft is clearly flying outside the LS, e.g. 250m outside, the aircraft will be identified as causing a “possible” track violation.

7.3.5 On identifying such a “possible” track violation, LLAOL's specialist environmental team will investigate with the airline and air traffic control to ascertain whether there were any valid justifications for the possible track violation, such as a specific air traffic control instruction or aircraft technical issue. If a valid justification is identified the incident will be noted and reported in the QFOR. If no valid justification is identified, then the aircraft operator will be warned and subject to a fine (see section 9).

#### 7.4 **Complaints**

7.4.1 All complaints raised by members of the public in relation to noise and track violations are handled in accordance with LLAOL's Aircraft Noise Enquiries and Complaints Policy, which is published on the Airport's website and is regularly updated.

### 8. **GROUND NOISE CONTROL SCHEME**

#### 8.1 **Elements of Luton's Overall Noise Management**

8.1.1 Luton Airport in exercise of the powers conferred on it by sections 63 and 64 of the Airport Act 1986, produced and promulgated byelaws, London Luton Airport Byelaws 2005, which were confirmed by the Secretary of State for Transport on 20th November 2005.

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<sup>5</sup> For example, on RNAV1 route it is 4000ft during both the daytime and night-time periods.

8.1.2 The Byelaws address in Part 5 Control of Aircraft Noise, and advise in Byelaws 5.2 on the controls, including noise which will apply to Ground Running and Testing of Aircraft Engines. The details are given in the schedule attached to the Byelaws.

8.1.3 The resultant ground noise control scheme has achieved minimal community reaction to ground noise sources over the last few years. It includes for the four main ground noise issues: -

(A) Ground running of aircraft propulsion engines

(1) The current restrictions are actioned by:-

(a) OSI 19-21 Aircraft Power Back Procedures

(b) OSI 22-21 Jet Blast

(c) OSI 46-21 Aircraft Engine Ground Runs + Booking and using the Engine Run-up Bay (ERUB)

(2) They seek to use the minimum engine power whilst on the aprons. Engine ground runs on the aprons are limited to check-starts that do not exceed ground idle power. Engine runs on stand are limited to one engine at a time for a maximum duration of 10 minutes.

(B) Preferential use of stands and taxi ways

(1) Luton Airport seeks to operate aircraft from the contact stands that abut the terminal building rather than those non-contact stands on the northern edge of the Airport. The preference cannot apply to the Cargo Apron, as clearly aircraft carrying out cargo operations will need to use that Apron.

(2) Luton Airport seeks to operate taxiway use in order to minimize times taken for departing aircraft, and so reduce ground noise.

(C) Use of Auxiliary Power Units

(1) OSI 048-21 sets out the rules and procedures for the use of Auxiliary Power Units (APUs) at the Airport. They require that APUs are used for the absolute minimum time, and whenever possible to ensure APUs are used for no more than 5 minutes after arrival on stand, and no more than 30 minutes before planned departure.



- (2) APUs are not to be used as a substitute for GPUs. The GPUs are subject to OSI 047-21, which requires new GPUs to make low working noise levels a prime requirement in the selection process.
  - (D) Ground run tests at night and locations for ground run test during the day period
    - (1) Measures and controls are detailed in:
      - (a) Byelaws: Part 5: Para 5.2 and associated schedule.
      - (b) OSI 046-14, Aircraft Engine Ground Runs and Booking and using the Engine Run Up BAY (ERUB).
- 8.1.4 These indicate that engine ground runs will not normally be permitted during night hours, 23.00-06.00 weekdays and 23.00-07.00 over the weekends, and on Public Holidays. The details of the management and control of engine ground runs and movements to and from ERUB have to be given in advance to the Airport Operations Control Centre, and approval sought.
- 8.1.5 The ERUB is located adjoining Taxiway A and is located distant from the main residential areas surrounding the airport. For all engine runs by jet aircraft, other than runs at ground idle power setting, the operator has to use the ERUB facility. They are required to keep noise disturbance to a minimum.
- 8.1.6 A review of this scheme will take place as part of the regular review of this NMP in accordance with the terms of the Section 106 Agreement.

9. **NOISE VIOLATION LIMITS/TRACK VIOLATIONS SANCTION/FINE SYSTEM**

- 9.1.1 LLAOL will take all reasonable steps to reduce the departure noise levels and have already in place some measures in the approved Noise Action Plan. The measures require LLAOL to work with the airline operators to adopt best practice to minimise noise of departing aircraft.
- 9.1.2 The night-time (2300-0700) NVL will be set at 79dB (A) with a progressive reduction to 77dB (A) from 1<sup>st</sup> January 2028. The daytime (0700-2300) NVL will be set at 80dB (A).
- 9.1.3 All violations of the NVL will be reported on a three-month basis in the QFORs, and annually in the AMR. The reporting will state the noise level excess over the NVL, the aircraft type, the past average noise level for the type concerned, the aircraft operator, the time of occurrence, and the sanction/fine action taken by LLAOL (see Table 1 below).
- 9.1.4 The NVL system shall be regularly reviewed in accordance with the review cycle associated with this NMP.

9.2 **Track Violations Sanction/Fine System**

- 9.2.1 LLAOL will report track violations in both the QFORs, and the SR. Such reports will identify:-
  - (A) the number of track-keeping violations;
  - (B) the operator causing such violations;
  - (C) the aircraft types causing such violations;
  - (D) the fines levied and paid into the Community Fund.
- 9.2.2 The fines will be set in accordance with Table 1 below and will be Index-linked and subject to review on an annual basis. Fines will be paid into the Community Fund. If the same operator operates subsequent departures at Luton Airport with the same generic aircraft type and is observed to cause similar “possible” track violations, which after the investigation are found to be actual track violations, then the aircraft operator will be subject to further fines.
- 9.2.3 LLAOL will include in the SR a report on the operation of the TVP System which will review the effectiveness of the TVP System and which will include as a minimum the following for the preceding year:



- (A) the number of fines levied by Luton Airport and the amount of revenue received by Luton Airport in payment of those fines, and paid to the Community Fund;
- (B) the categories of the violations by the airlines which gave rise to the fines;
- (C) the amount levied against each airline and each aircraft type which operates at Luton Airport; and
- (D) whether modifications to level of fine under the Track Violation Penalty System is necessary (and so the nature of those modifications) to improve its effectiveness in minimising the noise disturbance of residents.

9.2.4 The TVP System shall be regularly reviewed in accordance with the review cycle associated with this NMP.

9.2.5 LLAOL will continue to develop the TVP System and will have to take into account the changes occurring in UK, resulting from the introduction of new airspace arrangements, and new navigational methods.

	Fine per Event	
	Daytime 0700-2259 Local Time	Night-time 2300-0659 Local Time
Any Event	£1000	£2000

**Table 1: Noise Violation/Track Violation Sanctions/Fines**

## Appendix 1: Luton Airport Byelaws



5.1.4 Flying training carried out by the commander of an aircraft shall be subject to the following conditions:

- (a) permission shall be obtained either before departure by telephone communication with Apron Control or (in exceptional circumstances only) by consultation with Apron Control whilst in flight.
- (b) training circuits by all jet aircraft and by all propeller-driven aircraft whose maximum total weight authorised exceeds 5,700 kilograms shall be right hand when using Runway 08 and left hand when using Runway 26, and the minimum circuit height at the airport shall be 1,500 feet above aerodrome level unless otherwise instructed by Air Traffic Control.
- (c) the minimum circuit height at the airport for all jet aircraft and for all propeller-driven aircraft whose maximum total weight authorised does not exceed 5,700 kilograms shall be 1,000 feet above aerodrome level.

5.1.5 The operator or commander of any aircraft shall ensure that no jet aircraft shall take-off or land at night-time without notification having first been given by LLAOL that the take-off or landing is within the limit on the number of movements from time to time determined by LLAOL. Such notification is not required for

- (a) the landing at night-time of jet aircraft diverted to the airport or
- (b) the departure from the airport of such diverted aircraft where that departure is within the number of movements determined by LLAOL and allocated to the operator of that aircraft.

5.1.6 Before operating a jet aircraft of a type not previously operated at the airport by that operator, the operator concerned shall have satisfied LLAOL that the aircraft will be flown into and out of the airport in a manner calculated to cause the least noise disturbance practicable.

5.2 The ground running and testing of the engines of any aircraft shall be carried out only in any area or areas approved from time to time by LLAOL and subject to the conditions set out in the Schedule to these byelaws.

5.3 Any person who departs from any provision of this Part of these byelaws to the extent necessary for the purpose of securing the safety of aircraft in flight or the safety of aircraft, persons or property on the ground shall be deemed not to contravene that provision, but in that event he shall give or cause to be given full details of any such departure in writing to LLAOL within seven days of being required to do so.

## **PART 6 LOST PROPERTY**

6.1 Part 6 of these byelaws shall apply in relation to the safe custody, re-delivery and disposal of any property, animal or thing (except a motor vehicle as defined in section 11 of the Refuse Disposal (Amenity) Act 1978) which, while not in proper custody, is found on any part of the airport to which the public have access or in any vehicle owned or operated by or on behalf of LLAOL but excluding any property, animal or thing found on board an aircraft in a taxi or on premises let by LLAOL.

6.2 Subject to the provisions of the Customs and Excise Acts any person other than a member of staff of the airport company, an airport official or a constable who finds property to which these byelaws apply shall forthwith hand it in the state in which he found it to a member of staff of the airport company, an airport official, a constable or a designated agent and inform that person of the place and circumstances in which it was found.



- 6.3 (a) Subject to any provisions of the Customs and Excise Acts and to paragraph (b) any member of staff of the airport company, airport official or constable to whom property is handed pursuant to byelaw 6.2 or who himself finds any property to which these byelaws apply shall, as soon as reasonably practicable and in any case before leaving the airport, deliver such property for safe custody in the state in which it came into his possession to the lost property office or to a designated agent and inform a member of staff of the airport company or airport official at the lost property office or a designated agent of the circumstances in which it was found.
- (b) If before any lost property shall have been delivered for safe custody to the lost property office or a designated agent under this byelaw it is claimed by a person who satisfies the member of staff of the airport company or airport official or constable as the case may be that he is the true owner, it shall be returned to that person forthwith without fee on giving his name and address to the member of staff of the airport company or airport official or constable who shall as soon as possible report the facts and give the claimant's name and address and a description of the lost property to the lost property office or a designated agent.
- 6.4 Any lost property delivered to the lost property office shall be retained in safe custody by LLAOL until claimed by the owner thereof or disposed of in accordance with these byelaws and LLAOL shall keep for a period of not less than 12 months a record showing particulars of the lost property (whether delivered to the lost property office or a designated agent or disposed of pursuant to the provisions of byelaw 6.3), the circumstances in which it was found and recording the ultimate disposal of the property.
- Provided that:
- (a) any official document, including a licence or passport shall, wherever practicable, be returned forthwith to the appropriate government department, local authority or other body or person responsible for issuing it or for controlling or dealing with it;
- (b) where the name and address of the owner of any lost property, other than the documents referred to in the preceding proviso, are readily ascertainable LLAOL shall forthwith notify the owner that the lost property is in its possession and may be claimed in accordance with these byelaws.
- 6.5 If any lost property, while it is retained by LLAOL in safe custody, is claimed and the claimant proves to the satisfaction of LLAOL that it belongs to him and he gives his name and address to the lost property office, it shall be handed to him at the lost property office (or such other location as shall be notified) upon payment of such storage and administration charges as shall be calculated by reference to LLAOL's standard prevailing rates or (if upon request LLAOL shall deem it appropriate having regard to size and weight and subject to the payment of such storage and administration charges as aforesaid and a reasonable additional sum to cover postage and packaging) sent to the claimant by first class mail (if practicable) or otherwise by parcel post.
- 6.6 (a) If any lost property deemed by LLAOL to be of more than negligible value and retained by LLAOL for safe custody is not re-delivered to a person pursuant to byelaw 6.5 within three months of the date when it was delivered to the lost property office, LLAOL shall notify the finder in writing offering it for sale to the finder at such reasonable price as shall be specified in the notification. If the finder shall within fourteen days from (and including) the date of service of the notice pay the purchase price to LLAOL, LLAOL shall cause the relevant item of lost property to be delivered to the finder in the most appropriate manner at the risk of the finder. If the finder does not so respond within the above-mentioned time limit of fourteen days LLAOL shall use reasonable endeavours to sell it for the best



- price reasonably obtainable, and if it shall not have been able to do so within a further two months LLAOL shall be free to dispose of it as it thinks fit.
- (b) Notwithstanding the foregoing provisions of these byelaws, if any lost property retained by LLAOL is of negligible value and if, within fourteen days from the time when it was found, it has not been re-delivered to a person pursuant to byelaw 6.5, LLAOL shall be entitled to sell it at the best price that can be reasonably be obtained or to dispose of it as it thinks fit.
  - (c) Notwithstanding the foregoing provisions of these byelaws, if any lost property retained by LLAOL for safe custody is of a perishable nature and if it has not been re-delivered to a person pursuant to byelaw 6.5 within forty eight hours from the time when it was found, LLAOL shall be entitled to re-deliver it to its finder or to sell it at the best price that can reasonably be obtained or in the case of property of negligible value to dispose of it as it thinks fit.
  - (d) Notwithstanding the foregoing provisions of these byelaws, any lost property which is or which becomes objectionable may forthwith be destroyed or otherwise disposed of in a reasonable manner.
  - (e) A sale under this byelaw shall not prejudice the right, for a period of twelve months from the date on which the property came into the custody of LLAOL, of any true owner whose rights have been divested by the sale to be paid the proportion due to him of the residue of the proceeds of sale after deduction of any charge by LLAOL for the safe custody of the lost property and LLAOL's reasonable costs in connection with the sale.
- 6.7 Where any lost property is contained in a package, bag or other receptacle LLAOL may cause such receptacle to be opened and the contents examined for the purpose either:
- (a) of identifying and tracing the owner of the property, or
  - (b) of ascertaining the nature of the contents.
- 6.8 Any of the matters contained in byelaws 6.5, 6.6 and 6.7 that may be carried out by LLAOL may be carried out by a designated agent.

## **PART 7 PENALTIES**

- 7.1 Any person contravening byelaws 2.1, 2.5, 2.9, 2.10, 2.33, 2.34, 2.35, 2.36, 2.37, 2.38, 2.39, 2.40, 2.41, 2.42, 2.43, 2.44, 2.45, 2.46, 2.47, 3.2, 3.4, 3.7, 3.9, 3.10 and 3.13 and any byelaws in Part 5 and the Schedule shall be liable on summary conviction to a fine not exceeding level 4 on the standard scale<sup>1</sup>.
- 7.2 Any person contravening any of the byelaws in Parts 2, 3, 4, and 6 except the byelaws referred to in byelaws 7.1 and 7.3 shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale<sup>1</sup>.
- 7.3 Any person contravening byelaw 4.3 shall be liable on summary conviction to a fine not exceeding level 2 on the standard scale<sup>1</sup>.

<sup>1</sup>As at the date of these byelaws the relevant levels of the standard scale are, by virtue of section 37(2) of the Criminal Justice Act 1982, as follows:

Level 2 - £500

Level 3 - £1,000

Level 4 - £2,500

These levels are, however, subject to amendment from time to time by statute or by an Order under section 143 of the Magistrates' Court Act 1980.

## **PART 8 REVOCATION OF BYELAWS**

- 8.1 The byelaws which were made by London Luton Airport Limited under sections 63 and 64 of the Airports Act 1986 on the 6th August 1997 and which were confirmed by the Secretary of State for Transport on the 16th October 1997 are hereby revoked.

## **SCHEDULE**

### **Byelaw 5.2**

#### **Ground Running and Testing of Aircraft Engines**

1. For all engine runs by jet aircraft, other than runs at ground idle power setting, the operator of the aircraft concerned shall:
  - (a) ensure that the aircraft is positioned in the area prescribed by LLAOL,
  - (b) comply with any instructions or clearance issued by Air Traffic Control before commencement of the run,
  - (c) notify Air Traffic Control by radio at the commencement and cessation of each run.
2. The operator of the aircraft concerned shall ensure that, subject to paragraph 1, the aircraft is positioned in such a manner that the jet blast will not impinge on any runway, taxiway, aircraft, equipment installation or other property of the airport or third party.
3. LLAOL will give permission for an engine run under paragraph 2 between 0800 and 2000 hours local time on Mondays to Saturdays inclusive. In addition, LLAOL may at its absolute discretion grant permission for such runs:
  - (a) between 0600 and 0800 hours and between 2000 and 2300 hours local time on Mondays to Saturdays inclusive, and on Sundays between 1230 and 1800 hours local time, and
  - (b) in respect of aircraft fitted with high by-pass engines at any time.
4. Subject to paragraph 5, the operator of the aircraft and/or its employees, servants or agents as the case may be shall ensure that where a high by-pass engine is fitted to the NN/C (Chapter III) range of aircraft, piston and turbo-prop aircraft, engine runs other than at ground idle power settings are carried out with the engine positioned in the area prescribed by Air Traffic Control and that noise disturbance is kept to the minimum.
5. A single or double engine run at ground idle power settings may be undertaken if:
  - (a) the aircraft is positioned so as to cause no damage or inconvenience to persons or property;
  - (b) the engine run does not exceed 10 minutes;
  - (c) a qualified person is at all times in attendance outside the aircraft to ensure the safety of persons and property during the engine run;



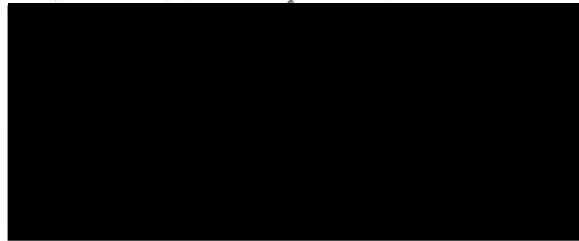
- (d) continuous radio contact is maintained with Air Traffic Control, from whom permission to start the engine(s) must be obtained and to whom notification must be given when the engine run is completed;
- (e) not more than two engines at a time are run; and
- (f) prior to commencing the run the following information is given to LLAOL (Apron Control):
  - (i) the aircraft's registration number or letters;
  - (ii) the aircraft's position on the airport;
  - (iii) the percentage power setting anticipated;
  - (iv) the expected duration of the engine run.

THE COMMON SEAL of LONDON LUTON )  
AIRPORT OPERATIONS LIMITED was )  
hereunto affixed this 3<sup>rd</sup> day of *October* )  
2005 in the presence of:- )



Director

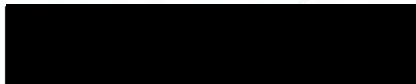
Company Secretary



K:\Legal\Vale\LLA-Byelaws  
13.6.05

The foregoing byelaws are hereby confirmed by the Secretary of State for Transport and shall come into operation on 20 November 2005

SIGNED BY



Jonathan Sharrock  
Head of Airports Policy Division  
by authority of the Secretary of State for Transport

*H* October 2005





LONDON LUTON  
AIRPORT

Map referred to in the  
London Luton Airport Byelaws 2005

**ANNEXURE 2  
EXISTING SUSTAINABILITY STRATEGY**





# Sustainability Strategy

## 1. Purpose

Planning consent was granted in 2014 by Luton Borough Council (LBC) to application 12/01400/FUL submitted by London Luton Airport Operations Ltd (LLAOL). LLAOL and London Luton Airport Ltd (LLAL) have also entered into a Section 106 Town and Country Planning Act 1990 (as amended) Agreement with LBC which includes obligations with respect to sustainability, given in Schedule 4 - Sustainability.

The Section 106 Agreement requires LLAOL to submit a draft Sustainability Strategy to LBC for approval. This document has therefore been produced to satisfy that requirement.

## 2. Introduction

London Luton Airport is the fifth largest and among the fastest growing of the UK's airports. In 2013 it served over 9.7 million passengers and facilitated the movement of 29,000 tonnes of cargo, with nearly 98,000 aircraft movements. The airport is also an important landmark in Luton and plays a major part in its economy. It is the single largest centre of employment in the area, contributing 8,400 direct jobs and nearly £1 billion to the region each year.

LLAOL is committed to operating in a way that maximises the socio-economic benefits for the local and regional area whilst minimising our environmental impact. To ensure this vision is shared and supported, we work closely with airlines, stakeholders and business partners to promote this approach across the airport, ensuring that the full benefits that London Luton Airport can bring to the region are realised.

This Sustainability Strategy sets out our proposal for managing sustainability, and sets objectives and targets that we will strive to achieve across the airport.

## 3. Aviation policy and guidance

LLAOL's vision for sustainability mirrors the vision outlined in the Department for Transport's (DfT) *Aviation Policy Framework* published in March 2013, which aims to support sustainable development within aviation. The framework explains "*This means making the necessary decisions now to realise our vision of stimulating economic growth and tackling the deficit, maximising wellbeing and protecting our environment, without negatively impacting on the ability of future generations to do the same*".

## 4. Environmental Management System

London Luton Airport Operations Ltd operates an Environmental Management System that covers all aspects of operations. The international environmental standard ISO14001 was obtained in September 2013 demonstrating a commitment to the continual improvement of environmental performance across the site.



The Environment Policy is published on the LLAOL website, making a public commitment to minimising the environmental impacts associated with the business activities. The current policy is provided in Appendix A.

***Assessment of opportunities and measures for implementation:***

Internal audits covering all requirements of ISO14001 are undertaken annually across all departments to identify opportunities for improvement. An audit is also undertaken annually by the external certification body, through which opportunities for improvement are also suggested.

Improvements will be made to the Environmental Management System promptly once identified.

***Performance Target:***

- Maintain ISO14001 accreditation.

## **5. Influencing Supply Chains**

Sustainability is considered throughout the procurement process at London Luton Airport for contracts of a substantial value. Where feasible and taking into account other relevant considerations such as safety and commercial factors, London Luton Airport consider sustainable procurement options for equipment, materials and services that:

- are non-hazardous;
- have a low carbon footprint;
- have a low water footprint
- are low in embodied energy;
- are recyclable;
- are reused, refurbished or recycled;
- are from renewable or sustainable sources;
- minimises the transport impact (i.e. sources from within a 30 mile radius of the airport)
- provides local employment or economic benefit

Companies are also assessed to determine whether they are accredited to ISO14001 or whether they uphold the same commitments and aspirations as those detailed in LLAOL's environment policy (Appendix A).

This assessment is undertaken using an evaluation matrix during the procurement process to compare companies.

***Assessment of opportunities and measures for implementation:***

During the Curium development, further measures will be taken to ensure sustainable procurement is fully integrated into the project. The principal contractor must operate their own ISO14001 accredited Environmental Management System (EMS), and 100% of suppliers and subcontractors must also either operate their own ISO14001 accredited EMS or demonstrate their ability to comply with the principal contractor's. Contractors will be required to demonstrate that wood is procured from an FSC (Forestry Stewardship Council) accredited source, and that aggregates used are recycled or secondary aggregates (unless not made possible due to the design specification).

Opportunities for further improvements will be assessed throughout the Curium development project.

**Performance Target:**

- The principal contractor and all subcontractors will comply with the requirements of an ISO14001 accredited Environmental Management System
- 100% of wood used during Curium will be procured from a sustainable source (FSC certified or equivalent)
- 100% of aggregates used during Curium will be recycled or secondary aggregates

## 6. Energy Efficiency

Climate change is one of the most significant challenges that the aviation industry will face in the coming decades. With energy prices also rising year on year and legislation increasingly putting pressure on companies to cut their emissions, energy efficiency is high on LLAOL's agenda.

Emissions are divided into the following categories:

- Scope 1 - direct emissions from LLAOL operations i.e. gas consumption and petrol/diesel in company owned vehicles (t CO<sub>2</sub>)
- Scope 2 - indirect emissions from consumption of electricity either within our own assets or within tenanted facilities (t CO<sub>2</sub>)
- Scope 3 - emissions from aircraft movements, passenger and staff travel to the airport, airside activities, waste disposal, etc.

Electricity, gas and fuel consumption (scope 1 and 2) is monitored across the airport, along with the associated carbon footprint. Whilst LLAOL mainly focus on improving energy efficiency which is under our direct control, we also work with business partners such as airlines, handling agents, retail companies and transport operators to reduce their energy usage too. Further information on how this is achieved is provided in Section 10.

**Assessment of opportunities and measures for implementation:**

LLAOL will undertake an energy review to determine areas of significant energy use, and identify, prioritise and record opportunities for improving energy performance. From this review, an action plan will be produced designating responsibility and outlining a timescale for implementation. This review will be undertaken annually from 2015, and include energy usage contributing to emissions under scopes 1, 2 and 3, thereby implementing measures to reduce our own energy usage as well as continuing to work with partners to reduce their emissions.

Energy efficiency will also be integrated into the design and development of the terminal building. The design will include energy efficient lighting, inverter motor drives and heat recovery measures.

**Performance Targets:**

- Achieve accreditation to ISO50001 – Energy Management by the end of 2015.
- Reduce scope 1 and 2 carbon emissions per m<sup>2</sup> of indoor space by 5% by 2020, compared to a baseline of 2014.
- Energy-efficient lighting, inverter motor drives and heat recovery incorporated into the terminal design.

### Low Carbon Generation of Heating/Cooling Facilities and Electricity

VRF heat recovery systems will be included in the terminal design. More information will be available at a later design stage.



**Performance Target:**

- Derive at least 10% of the total energy requirements of the terminal extension from renewable or low carbon sources.

## 7. Waste Management and Recycling

LLAOL has developed a waste management strategy for the Airport as part of the environmental management system. Central to this strategy is the need for LLAOL to comply with all legal requirements, including the waste management hierarchy.



A range of initiatives are in place at the Airport to reduce waste generation and encourage re-use and recycling. Textiles are also collected and donated to LLAOL's charity of the year via a dedicated clothes bin, and on average approximately 2 tonnes of textile waste are generated per month. There are recycling points for passenger waste throughout the landside and airside areas of the terminal, as well as all staff areas. These recycling points provide passengers, employees and business partners with the opportunity to recycle plastic, metal, cardboard, paper and glass. Retail units are also provided dedicated recycling facilities, which extend to food waste, oils and glass.

This encourages the segregation of recyclables at source, however waste is also sorted manually on site and off site to ensure as much waste as possible is diverted from landfill.

Waste that arises throughout construction activities will be managed separately. Excavated material will be reused on site where possible, and where waste is sent off site it will be recycled or disposed of via a licensed waste contractor.

**Assessment of opportunities and measures for implementation:**

LLAOL audits all aspects of the Environmental Management System annually, and measures to reduce the amount of waste generated and increase recycling rates are identified through this process.

LLAOL will operate an Environment Forum starting in 2015, where LLAOL and third party businesses located within the Airport boundary will meet to promote waste management and recycling.

**Performance Targets:**

- 40% annual recycling rate by 2015 for waste arising from operational activities, and 55% by 2020.
- 90% of construction waste to be reused or recycled throughout the development.

## 8. Water Management and Efficiency

Climate change is a strategic driver for London Luton Airport, and the airport is committed to reducing its impact to help contribute to a sustainable future. The increase in passenger numbers as a result of the development will increase water usage at the Airport. Climate change is anticipated to increase the likelihood of drought, and therefore the availability of water may be affected in the coming decades. London Luton Airport will monitor water usage across the site, and minimise site water demands to mitigate this impact where possible.

Water management issues relating to flooding, the foul network and surface water run-off will be detailed through the discharge of planning conditions.

### *Assessment of opportunities and measures for implementation:*

LLAOL audits all aspects of the Environmental Management System annually, and measures to reduce the amount of water used are identified through this process.

Opportunities for water minimisation have also been identified through the design phase. Low-water usage appliances will be included in the terminal development and sub-metering will also be installed.

### *Performance Targets:*

- Improve water metering facilities.
- Reduce water usage per pax by 5% by 2020, compared to a baseline of 2014.
- Low-water usage appliances incorporated into the terminal design.

## 9. Biodiversity

The maintenance and enhancement of biodiversity is a key sustainability issue. In the context of London Luton Airport however, the airport's constrained footprint and operational use mean that the site itself has limited ecological value.

Through the Community Trust Fund, requests for grants will be considered from local schools and community-led organisations for projects that support and enhance biodiversity at appropriate locations in the airport's catchment. The fund is managed by Bedfordshire and Luton Community Foundation, and information on how to apply is available on the London Luton Airport website.

An Environmental Management Contribution of £5,000 shall also be provided to Luton Borough Council annually for the purposes of grassland and hedgerow management at Wigmore Valley Park as the Council's ecologist considers necessary.

## 10. Promoting sustainability across the Airport

Sustainability is promoted not just throughout LLAOL's activities but across all organisations that work at the Airport. This is reflected in LLAOL's Environment Policy (Appendix A) which states that London Luton Airport will seek collaboration from its service partners to operate in compliance with their regulatory obligations and will encourage the adoption of industry best practice. This is achieved through a variety of ways, a number of which are detailed below. London Luton Airport's surface access strategy (ASAS) promotes the use of sustainable forms of transport to and from the airport for all staff working on the site. As well as working with transport operators to provide the best service possible for staff and passengers, we undertake a staff travel survey every two years to help identify areas for improvement. We also work with operators to ensure staff receive discounts



on bus, coach and train travel, and operate a lift-share scheme across the site. More information on how sustainable modes of transport are promoted among staff is available in the ASAS published on the LLAOL website.

Concessionaires are required to follow the Concession Design Criteria when fitting out their units. Through the design criteria, consideration is given to energy efficiency and materials used. Concessionaires are also required to follow the waste hierarchy. Recycling facilities are provided, and organisations are incentivised to use this through lower rates of disposal.

Contractors working on the Airport site are required to comply with LLAOL's Contractors Code of Practice. This covers areas including pollution control, waste management and noise.

Pollution control is a key issue across the Airport apron. LLAOL work closely with airline and aircraft servicing companies to ensure pollutants such as fuels and de-icers do not enter the surface water drains. All organisations participate in an incident and near miss reporting system to ensure proactive measures are taken to control pollution as well as reactive measures where necessary.

Airlines and air traffic control also works closely with LLAOL to help minimise the environmental impacts and maximise the sustainability of the departure and arrival routes from London Luton Airport. Operations are continually reviewed to ensure noise impacts and fuel burn are minimised as far as possible. In the last few years new flight routes have been trialled which would save 885 tonnes CO<sub>2</sub> annually and reduce the number of people overflow along these routes by nearly 80%. An application has been submitted to the CAA with support from airlines and air traffic control to adopt these changes, and other routes will be assessed for similar modification in the next year.

## 11. Monitoring

Throughout the operation of the approved Sustainability Strategy, the Operator shall report to the Council annually as part of the Annual Monitoring Report (AMR) on the performance of the Airport against the targets in this Sustainability Strategy. The activities and achievements of the Environment Forum will also be reported annually through the AMR.

## Appendix A: Environment Policy (2015)





# ENVIRONMENTAL POLICY

**London Luton Airport Operations Ltd (LLAOL) recognises and accepts its responsibility to minimise the environmental impacts of its business activities. London Luton Airport will continuously review its environmental performance to manage those impacts.**

**In pursuit of this objective, London Luton Airport commits to:**

- Ensure our environmental activities are safe for our employees, customers, visitors and others who come into contact with our business.
- Assess the potential environmental impacts of all operations and remove or mitigate these risks where possible.
- To comply with and or seek to exceed where possible relevant legislation, regulations and other requirements to which LLAOL subscribes in relation to its environmental aspects.
- Strive to achieve continual environmental improvement and prevention of pollution at London Luton Airport.
- Ensure LLAOL's Environmental Management System is documented, implemented, reviewed and maintained.
- Respect and adapt to the environment and ensure prudent use of natural resources.
- Improve energy efficiency and reduce associated carbon emissions where possible.
- Minimise waste generation, reuse and recycle where practicable.
- Undertake, set and review LLAOL's environmental policies, objectives and targets annually.
- Assign clear responsibilities within the organisation for all environmental management.
- Actively participate where possible in local, national or international activities aimed at mitigating the environmental impact of airports.
- Communicate this policy to all persons working for or on behalf of the organisation and make it available to the public.
- Assess all environmental impacts when improving or developing London Luton Airport.
- Ensure all employees working on behalf of LLAOL have a full understanding of their environmental responsibilities and that they are trained and competent to fulfil what is being asked of them.
- Retain ISO14001:2004 accreditation status.

This Environmental Policy encompasses those business activities, services and locations directly under the control of London Luton Airport, and is given effect through an environmental management system that meets the requirements of ISO14001:2004.

Whilst not detracting from or diminishing the responsibility of others, London Luton Airport will seek collaboration from its service partners to operate in compliance with their regulatory obligations and will encourage the adoption of industry best practice and the principles within this policy.



**Nick Barton**  
Chief Executive Officer  
London Luton Airport

January 2015

**ANNEXURE 3  
TRAVEL PLAN**







London Luton Airport Operations Ltd

# London Luton Airport 19mppa Expansion

Travel Plan (November 2022)





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## Report for

LLAOL

London Luton Airport Operations Ltd

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## Main contributors

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## Management systems

This document has been produced by WSP Environment & Infrastructure Solutions UK Limited in full compliance with our management systems which have been certified to ISO 9001, ISO 14001 and ISO 45001 by Lloyd's Register.

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## Document revisions

No.	Details	Date
P05	Review during public inquiry	04/11/2022
P06	2 <sup>nd</sup> Review during public inquiry	17/11/2022

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# 1. Introduction

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This Travel Plan sets out objectives and targets with a series of measures to promote sustainable modes for passengers (coach & rail) and staff (bus, coach, rail, walking, cycling) transport walking and cycling) to reduce the impact of private car use associated with London Luton Airport Operations Limited (LLAOL) application to increase total passengers from 18 million (mppa) to 19 million (mppa).

The targets have been updated following a review of the London Luton Airport (LLA) Airport Surface Access Strategy (ASAS) 2018 – 2022<sup>1</sup> against the latest passenger and staff travel figures from the latest Civil Aviation Authority (CAA) statistics and 2019 LLA Staff Travel Survey. An update to ASAS for the period after 2022 is pending and this Travel Plan will inform that updated document.

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<sup>1</sup> London Luton Airport (2019). Airport Surface Access Strategy (ASAS) 2018 – 2022 (2019 Reissue). [online] Available at: <https://www.london-luton.co.uk/LondonLuton/files/a3/a31129aa-284b-4b4c-aae0-ed0208d70fec.pdf> [Accessed 18 May 2020].



## 2. Background

### 2.1 Site Context

Luton Airport is situated to the south-east of Luton, approximately 45km from Central London to the South and 30km from Milton Keynes to the North. The site itself sits predominantly within the Unitary Authority of Luton Borough Council (LBC), as well as partly within Central Bedfordshire Council (CBC).

The Airport primarily provides commercial flights by low-cost scheduled operators, as well as a small number of chartered flights and business and cargo trips. The site consists of a single runway which runs east to west for approximately 2.2km along the southern edge of the site boundary.

Airport facilities are all found to the North of the runway with a Central Terminal Area (CTA) located centrally within the site. The Airport lies approximately 1.5km from Luton Airport Parkway Rail Station to the south-west, with frequent shuttle services providing a connection for passengers between the station and the CTA, as shown in Figure 2-1 below. **Error! Reference source not found.**

**Figure 2-1 Location of Central Terminal Area (CTA) and Luton Parkway Rail Station**



Source: Google Earth



Airport Way connects to the A1081 and A505 via the A1081/A505/Percival Way roundabout to the west of the site. From the A1081 access can be gained directly onto the M1 via Junction 10, as well as to Luton Airport Parkway Rail Station via the B653 and Parkway Road. Additionally, Percival Way provides a connection through the adjoining business estate and on into Luton's eastern residential settlements.

The A1081/A505/Percival Way roundabout connects to a second roundabout with the A505 Kimpton Road and A505 Vauxhall Way, approximately 500m further west. The A505 Kimpton Road routes in Luton Town Centre approximately 3km away, while the A505 Vauxhall Way routes into the Luton's eastern residential settlements.

## 2.2 Proposed Development Summary

The planning application to support the increase of the airport's capacity to 19 mppa currently does not include any physical changes to the airport terminal building and surrounding infrastructure.

### Site Access

Access into the site by road can be gained via Airport Way and Airport Approach Road. These roads pass by the Short-Term Car Park, Mid-Term Car Parks, Holiday Inn, the Ibis, and directly into the CTA which has associated public transport facilities, drop-off/pick-up zones, taxi bays and Priority Parking.

Following the updated Transport Assessment (TA)<sup>2</sup> for the 19 mppa planning application completed by Wood, it has been identified that the increase in passengers is unlikely to have a significant impact on the operation of the existing transport network, due to a very modest increase in traffic flows generated by the proposed expansion.

### Walking and Cycling Facilities

All existing walking and cycling facilities are to be retained. Possible additions to future walking and cycling infrastructure may be recommended within the Travel Plan Measures in Section 7 if current infrastructure is not deemed sufficient in helping the airport achieve its new objectives and targets.

No walking and cycling improvements are proposed as part of the Transport Assessment for 19 mppa.

### Parking Provision

LLA currently has six car parks in operation, as shown in Table 2-1 below.

**Table 2-1 Car parking available at LLA**

	DOZ	TCP1	TCP2	MSCP	LSCP	Car Park B	NHCP
<b>Status</b>	Operational	Operational	Operational	Operational	Operational	Operational	Operational
<b>Type</b>	Drop off	Any length	Any length	Mid-term	Long-term	Staff parking	Staff parking

<sup>2</sup> Document Reference: 41431-WOOD-XX-XX-RP-OT-0002\_S3\_P02



Note: DOZ (= Drop Off Zone)      TCP1 (= Terminal Car Park 1)      TCP2 (= Terminal Car Park 2)  
 MSCP (= Mid Stay Car Park)      LSCP (= Long Stay Car Park)      NHCP (= Navigation)

Table 2-2 below gives an overview of capacity, pricing and charging processes for each of these car parks.

**Table 2-2 Car parking summary**

	DOZ	TCP1	TCP2	MSCP	LSCP	Car Park B	NHCP
<b>Capacity</b>	Not designated spaces	1,699 spaces	1,924 spaces	1,281 spaces + 120 motorcycle spaces	4,151 spaces	555 spaces + 20 car-share spaces	94 spaces + 10 motorbike spaces (no official car-share spaces but car-share space capability)
<b>Pricing</b>	£4 for 10mins then £1 per min thereafter	Pre-bookable From February 2020 <30mins £9 30-45mins £11.50 45-60mins £16.50 1-2hr £20.50 2-3hr £27 3-4hr £35 4-5hr £37 5-9hr £58 9-24hr £58 Additional days £64 per day	Pre-bookable From February 2020 <30mins £8 30-45mins £10.50 45-60mins £14.50 1-2hr £18.50 2-3hr £24 3-4hr £31 4-5hr £33 5-9hr £52 9-24hr £58 Additional days £58 per day	Pre-bookable From February 2020 <15mins Free 15-25mins £3.50 25-40mins £8.50 40-60mins £12.50 1-24hr £32 Additional day £32 per day Motorcycle Park free for up to 21 days	Pre-bookable From February 2020 <1hr Free 1-2hr £4.50 >2 £28 Each subsequent day £24	£775 per year (individual) £365 per year (car-share)	£2,315 per year (individual) £1,095 per year (car-share)
<b>Charging process</b>	ANPR with cash/card payment. £100 PCN for unattended vehicles	Ticket entry for gate-customers. ANPR for pre-booked customers. Pay on foot machines provided. £100 PCN For unauthorised vehicles	Ticket entry for gate-customers. ANPR for pre-booked customers. Pay on foot machines provided. £100 PCN for unauthorised vehicles	Ticket entry for gate-customers. ANPR for pre-booked customers. Pay on foot machines provided. £100 PCN for unauthorised vehicles	Ticket entry for gate-customers. ANPR for pre-booked customers. Pay on foot machines provided. £100 PCN for unauthorised vehicles	Via barrier that raised automatically. Vehicles must display parking badge. £100 PCN for unauthorised vehicles	Via Staff ID card swipe. Vehicles must display parking badge. £100 PCN for unauthorised vehicles

## 2.3 Policy Overview

The objectives and measures in this Travel Plan have been informed by National and Local policies including:

### **National Planning Policy Framework (July 2021)**

Chapter 9 – Promoting Sustainable transport. The NPPF states in paragraph 113:

*'All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.'*

In paragraph 112, the NPPF states that in assessing sites for development, consideration should be given to the promotion of sustainable transport modes, safe and suitable access routes by all transport.

### **Flightpath to the Future (2022)**

Page 44 states that reliable and efficient surface access connections are important in supporting the role of airports as regional transport hubs and states that *'We expect airports, through their surface access strategies, to set targets for sustainable passenger and staff travel to and from the airport.'*

### **Jet Zero Strategy: Delivering net zero aviation by 2050**

Encourages airports to work with airlines, local authorities and local transport providers to consider how they can develop integrated service offerings with surface transport providers (para. 360) and encourages airports to improve their surface access strategies to ensure easy and reliable access for staff and passengers, increase the use of public transport and minimise congestion, emissions and other local impacts (para. 363).

### **Luton Local Plan (2017)**

Policy LLP31 integrates the Luton Local Transport Plan 2011 – 2026 which aims to 'ensure that an integrated, safe, accessible, and more sustainable transport system supports the economic regeneration and prosperity of the town.'

### **My Climate Action Plan – Luton BC (November 2021)**

This sets out the initial opportunities Luton Borough Council identified to reduce carbon emissions and increase carbon sequestration relating to the council's operations. These will be followed up by consultations with stakeholders in the run up to reviewing the Local Plan.

### **Luton Borough Council's Climate Action Plan Support (January 2020)**

Section 6 of this document addresses the London Luton Airport Emissions, which represent a significant proportion of the borough's overall emissions. The document states 'it will be vital for the council to work closely with the airport and associated businesses to manage and reduce the environmental impacts of the airport's operations, passenger activity and flights' and includes various recommendations in respect of emissions, a number of which are relevant to surface access.



## 2.4 Transport Context

The airport is well served by sustainable travel options. The public transport hub located within the CTA provides frequent shuttle services to the nearby Luton Parkway Rail Station as well as bus and coach services to a range of major cities and airports across the UK.

Access to the airport on foot can be gained by footpaths and crossing facilities along the Airport Approach Road, Airport Way and Percival Way. There is less likelihood for cyclists to travel to the airport as passengers, however, cycling is an option for nearby staff. For cyclists, dedicated facilities are not provided into the CTA, however, shared foot/cycle ways along parts of the A505 and on-road facilities provided along the A1081 benefit local cyclists.

### Rail Network

The nearest available rail station is Luton Airport Parkway which is situated 1.6km as the crow flies to the south-west of the site. The station operates Thames Link and East Midlands services to London, the south, the Midlands, and the North. A summary of key destinations is shown in Table 2-3. Due to the COVID-19 Pandemic it is expected that services will be operating at reduced frequencies temporarily.

**Table 2-3 Key rail services to/from Luton Airport Parkway Rail Station**

Destination	Typical Weekday Frequency	Typical Journey Time	Operator
<b>Bedford</b>	6 trains per hour	28 mins	Thames Link & East Midlands
<b>Brighton</b>	2 trains per hour	1 hr 59 mins	Thames Link
<b>Gatwick Airport</b>	4 trains per hour	1 hr 36 mins	Thames Link
<b>Leicester</b>	1 train per hour	57 mins	East Midlands
<b>London St Pancras</b>	6 trains per hour	32 mins	Thames Link & East Midlands
<b>Nottingham</b>	1 train per hour	1 hr 26 mins	East Midlands

Source: nationalrail.co.uk

### DART System

Additional to the existing rail network, construction of the Luton Direct Air-Rail Transit (DART) system began in 2018. The DART will provide a connection for passengers and airport staff between Luton Airport Parkway Station and the terminal in under four minutes. The route will navigate between two purpose-built stations at Bartlett Square and the airport terminal via a bridge crossing over Airport Way Road.

The transit system is driverless and will remove the element of delays via traffic congestion currently presented by the bus shuttle service. The service aims to allow passengers to reach the terminal from London St. Pancras within 30 minutes.

The DART system has funding for £225 million and is being funded and delivered by LLAL. The announcement on the opening date is expected in the first quarter of 2023. It is expected to operate 24/7. Error! Reference source not found. Error! Reference source not found. indicates the route.

**Figure 2-2 DART system indicative plan**



## Bus and Coach services

Bus and coach services can be accessed directly from the CTA with a Public Transport Hub providing dedicated bus and coach bays for services routing to staff parking, medium and long stay parking, car hire facilities, as well as connections to Luton Airport Parkway rail station, local destinations, and major cities and airports across the UK. Due to the COVID-19 Pandemic it is expected that services will be operating at reduced frequencies temporarily.

National Express coach services can be accessed via the Public Transport Hub at the CTA and afford direct routes to major cities and airports across the UK.

Frequent National Express services route directly to London connecting to key onward transport hubs, namely, Victoria Coach Station and Paddington Rail Station, calling at Golders Green, Finchley Road, Baker Street and Marble Arch. Services to London Paddington run Monday to Sunday between approximately 05:00 – 01:00. Services to London Victoria run Monday to Sunday 24 hours a day with a less frequent service running every hour between approximately 01:00-04:00.

Other National Express services route directly to the cities of Birmingham, Cambridge, Coventry, Leicester, Milton Keynes, Northampton, Nottingham, Oxford and Sheffield, as well as Gatwick, Heathrow and Stansted Airport.



Arriva Bus provides a Dunstable – Luton Airport service. The service runs Monday to Sunday between approximately 04:00 – 24:00 and is operated by Arriva The Shires.

Table 2-4 shows frequency and typical journey times to key destinations for both service providers. Due to the COVID-19 Pandemic it is expected that services will be operating at reduced frequencies temporarily.

**Table 2-4 Key coach services to/from Luton Airport**

Destination	Typical Weekday Frequency	Typical Journey Time	Operator
<b>Birmingham</b>	11 services	2 hrs 40 mins	National Express
<b>Cambridge</b>	9 services	1 hr 30 mins	National Express
<b>Coventry</b>	12 services	1 hr 40 mins	National Express
<b>Gatwick Airport</b>	9 services	2 hr 20 mins	National Express
<b>Heathrow Airport</b>	24 services	1 hr 5 mins	National Express
<b>Leicester</b>	9 services	1 hr 45 mins	National Express
<b>London (Paddington Rail Station)</b>	42 services	1 hr 11 mins	National Express
<b>London (Victoria Coach Station)</b>	48 services	1 hr 20 mins	National Express
<b>Milton Keynes</b>	21 services	40 mins	National Express
<b>Northampton</b>	9 services	1 hr 15 mins	National Express
<b>Nottingham</b>	8 services	2 hr 50 mins	National Express
<b>Oxford</b>	8 services	2 hrs	National Express
<b>Sheffield</b>	3 services	4 hr 20 mins	National Express
<b>Stansted Airport</b>	17 services	1 hr 25 mins	National Express
<b>Dunstable</b>	50 services	30 mins	Arriva The Shires

Sources:  
 -nationalexpress.com  
 -arrivabus.co.uk

Some bus services can be accessed from the Public Transport Hub at the CTA. The 99 service runs hourly between London Luton Airport and Milton Keynes 7 days a week. The 755/757 service runs frequently to London Victoria Coach Station 7 days a week, every 30 minutes and is operated by

Greenline. The 100/101 Sapphire service operated by Arriva routes to Stevenage every 30 minutes 7 days a week. The A and 888 services provide a dedicated link to Luton Airport Parkway running frequent services 7 days a week. A summary of the bus services to Luton is shown in Table 2-5 Table 2-5. Due to the COVID-19 Pandemic it is expected that services will be operating at reduced frequencies temporarily

**Table 2-5 Key local bus services to/from Luton**

Route	Key Towns Served	Typical Frequency	Operator
99	Luton Airport, Luton, Milton Keynes	1 per hour (Mon-Sun)	Stagecoach
755/757	Luton Airport, Luton, Bricket Wood, Brent Cross, Baker Street, Marble Arch, Victoria Coach Station	Every 30 mins (Mon-Sun)	Greenline
100/101 Sapphire	Luton Airport, Hitchin, Stevenage	Every 30 mins (Mon-Sat) & Every 2 hours (Sun)	Arriva
888	Luton Airport, Luton Parkway	Every 20 mins (Mon-Sat) & Every 30 mins (Sun)	London General
A	Luton Airport, Luton Parkway, Dunstable	Every 15 mins (Mon-Sat) & Every 20 mins (Sun)	Arriva

Source: stagecoachbus.com, greenline.co.uk, arrivabus.co.uk

As well as the A and 888 bus services, an interchange shuttle bus services runs between the CTA and Luton Airport Parkway Station which is approximately 1.6km south-west as the crow flies. This shuttle service runs every 10 minutes, takes approximately 6 minutes, and provides access to additional bus services at Luton Parkway Bus Station, as detailed below in Table 2-6 Table 2-6. Due to the COVID-19 Pandemic it is expected that services will be operating at reduced frequencies temporarily.

The 44/45 service routes between Stevenage and Luton Parkway running at Monday to Friday service every 2 hours. The 366 service runs between Luton Parkway, Harpenden and Hatfield within an hourly service Monday to Friday. The 610 service routes to Enfield via Harpenden and Potters Bar with an hourly service Monday to Saturday.

**Table 2-6 Key local bus services to/from Luton Airport Parkway Bus Station**

Route	Key Towns Served	Typical Frequency	Operator
44/45	Stevenage, Knebworth, Codicote, Kimpton, Luton Parkway Station	Every 2 hours (Mon-Fri)	Centrebus
366	Luton Parkway Station, Harpenden, Wheathampstead, Welwyn Garden City, Hatfield	1 per hour (Mon-Fri)	Centrebus
610/611/612	Luton Parkway Station, Harpenden, Hatfield, Welham Green, Potters Bar, Enfield	1 per hour (Mon-Sat)	Uno

Source: centrebus.info, unobus.



## Walking and Cycling

Walking facilities are provided between the CTA, surrounding hotels, car parking facilities and nearby settlements. Footway provisions within the vicinity of the airport along key corridors are generally in good conditions with street lighting provided.

Pedestrians can access the airport on foot from the nearby hotels, namely, the Ibis, Holiday Inn, and the Marriott. Airport Way affords access to the CTA via a footway with guard-railing along the northern side of the carriageway.

Pedestrians can additionally route on foot from the Short-Term, Mid-Term and Multi-Storey car parking facilities. The Mid-Term Car Park is located to the south of Airport Way, accessing the north-side guard-railed footway via signalised toucan crossings. For the Multi-Storey Car Park, a covered footbridge is provided across a series of Airport Approach Roads allowing safe passage to the CTA.

For staff or travellers accessing the site from nearby settlements to the North, footways are provided on both sides of Percival Way which connects between Airport Way and Eaton Green Road. A pelican crossing and a zebra crossing are provided along Percival Way, as well as informal crossing points with tactile paving and refuge islands located at the A505/A1081/Percival Way roundabout to enable safe crossing.

Cycle use by passengers to the airport is deemed to minimal, however, cycling is a viable option for staff routing from the surrounding settlements or as part of a multi-modal journey. To the south-west of the site, National Cycle Route 6 (NCR6) runs off-road adjacent to Lower Harpenden Road, under the A1081, across the B653 Gipsy Lane and adjacent to the A1081, before routing on-road along Park Street. On approach and exit to the Luton Parkway Rail Station, advisory on-road cycle lanes with contract surfacing are provided which connect between the rail station cycle parking and the B653 including NCR6.

At a local level, NCR6 routes into Central Luton, Limbury, Marsh Farm and Houghton Regis to the north, and Harpenden to the south. At a strategic level, the NCR6 provides a cycle connection between, Leicester, Northampton, Milton Keynes, Luton, St Albans and Watford.

Additional to national cycle routes, localised cycle provisions can be found along Airport Way between Holiday Inn and the A1081/A505/Percival Way roundabout in the form of a shared foot/cycleway with associated signage and road markings. On-road mandatory cycle lanes are also provided along the A1081 between the A1018/A505/Vauxhall Way roundabout and Capability Green Business Park.

Figure 2-3 National Cycle Routes – Luton and Luton Airport





## 3. Travel Plan Objectives and Targets

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### 3.1 Objectives

The following objectives have been created to ensure LLAOL delivers a successful travel plan as part of the 19 mppa application. It sets targets for up to 2028. Targets for the period 2028- 2031 will be agreed with the Local Planning Authority before the end date of this Travel Plan as the Airport updates is ASAS to cover this period.

**Objective 1:** Improve public transport accessibility for passengers and staff through enhanced provision and promotion

- DART and rail connectivity promotion
- Public transport discounts and promotions for staff

**Objective 2:** Extend opportunities for staff and passengers to use alternative modes of transport other than private car

- Set out a series of cycle infrastructure improvements
- Car-sharing promotion

**Objective 3:** Reduce carbon emissions produced by surface access travel to/ from the airport

- Explore electric vehicle charging point options
- Quantify emission reduction figures as a result of the DART
- Explore a switch from diesel to petrol/ electric run buses
- Cycling promotion

### 3.2 Future Targets

This section looks at the latest travel data for both staff and passengers to propose new stretching targets that are SMART.

The term 'target' is used in the sense of a statement that contains a measurement of the Travel Plan objectives and is a measure of outcomes achieved by the Travel Plan. Targets should be **SMART** - **S**pecific, **M**easurable, **A**chievable, **R**ealistic and **T**imed, and should help achieve, and be related to each of the numbered objectives set out in **Section 6.1**.

It should be noted that all targets will deliver improvement in mode share in absolute terms as the numbers of passengers grow and as such both maintaining and increasing targets in % terms will have a positive impact on the number of employees and passengers switching to sustainable modes.

The following sources have been employed to obtain target data:

- Pre-existing targets for 2016, 2019 and 2022 for staff and passengers have been obtained from the 2018-2022 ASAS;
- Actual target results for 2016 for staff and passengers have been obtained from the 2018-2022 ASAS;

- Actual target results for staff in 2019 have been obtained from a Staff Travel Survey conducted by Systra in 2019; and
- Actual target results for passengers in 2019 have been obtained from 2019 CAA Data.

## Target 1: Increase Sustainable Travel to and from LLA

### Increase passenger travel by sustainable modes of transport

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
32%	32%	34%	43%	36%	47%	47%

Passenger sustainable transport has increased from 32% to 43% between 2016 and 2019; achieving the target of 34% set out in 2019, as well as the previously established 36% 2022 target. A new ambitious target of 47% has been set across the period of the travel plan with Section 7 detailing specific measures for achieving this. When compared to previous performance (43% for 18mppa), the 47% target in 2028 when applicable to all passengers (19mppa) in effect will remove passengers off the road network which in absolute terms is a 1.19mln net decrease in passengers travelling by non-sustainable modes.

### Increase passenger travel by bus and coach

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
16%	16%	N/A	22%	17%	22%	22 %

Passenger bus/coach travel has increased from 16% to 22% between 2016 and 2019. A 2024 and 2028 target of retaining this 22% has been set, with Section 7 detailing specific measures for achieving this. Maintaining the target reflects the anticipated strong competition from improved rail services/ DART connectivity (mode share reflected in the rail target). The airport is working with bus/ coach operators to further improve bus/ coach mode share targets in the future. The 22% target in 2028 when applicable to all passengers (19mppa) in effect will increase the number of bus/ coach users by 220,000 per annum.

### Increase passenger travel by rail

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
16%	16%	N/A	21%	24%	25%	25%

Passenger rail travel has increased from 16% to 21% between 2016 and 2019. A new 2024 target of increasing to 25% has been set, as the opening of the DART is likely to have a positive impact on passenger rail travel. A 25% target has been set across the period of the travel plan with Section 7 detailing specific measures for achieving this. When compared to previous performance (21% for 18mppa), the 25% target in 2028 when applicable to all passengers (19mppa) in effect will increase the number of rail users by 970,000 per annum.



### Increase **employee** travel by **sustainable modes** of transport

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
24%	24%	26%	31%	28%	35%	37%

The 2022 target of a minimum of 28% sustainable transport mode share for employees has already been achieved with an increase from 24% to 31% from 2016 to 2019. Therefore, a new 2024 target of 35% and 2028 target of 37% sustainable transport mode share for employees has been set. The new targets include increases in employee travel by bus and coach, rail and cycling. It should be noted that the previous 2024 target of 33% (version P04 of the Travel Plan) has been corrected to 35% to account for walking.

### Increase **employee** travel by **bus and coach**

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
9%	9%	N/A	16%	11%	17%	18%

The 2022 target of a minimum of 11% bus/coach mode share for employees has already been achieved with an increase from 9% to 16% from 2016 to 2019. Therefore, a new 2024 target of 17% bus/coach mode share and 2028 target of 18% bus/coach mode share for employees has been set.

### Increase **employee** travel by **rail**

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
7%	7%	N/A	8%	9%	10%	10%

Employee rail travel has increased from 7% to 8% between 2016 and 2019. A new 2024 target of increasing to 10% has been set. The 10% target is to be maintained in 2028. This is related to the trend of an increasing mix of locally employed staff who are more likely to use bus/coach and walking/ cycling which is reflected in increased targets for those modes.

### Increase **employee** travel by **cycle**

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
N/A	2.4%	N/A	1.7%	N/A	3%	4%

From 2016 to 2019, the percentage of staff arriving to the airport by cycle reduced from 2.4% to 1.7%. With the implementation of a set of measures detailed in Section 7, a new target has been set for 2024 of increasing the mode share of staff cycling to work to 3%. A new ambitious target of 4% has been set for 2028 which we believe is achievable with the introduction of e-bikes.

## Maintain employee walking

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
N/A	5%	N/A	5%	5%	5%	5%

## Increase employee awareness of Cycle-to-Work scheme

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
71%	71%	N/A	46%	80%	80%	85%

Awareness of the Cycle-to-Work scheme has reduced from 71% to 46% between 2016 and 2019. A 2024 target of 80% and 2028 target of 85% have been set to be achieved with specific measures put in place in Section 7.

## Target 2: Reduce private, non-electric car travel

### Reduce passenger non-electric private car travel

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
51%	50%	49%	40%	43%	40%	39%

The 2022 target of a 43% private car travel has already been achieved with a reduction from 51% to 40% from 2016 to 2019. Therefore, a 2024 target of retaining the 40% achieved has been set, this is already 3% below the original target set for 2022. The 1% increase targeted in 2028 is conservative on the basis that the airport does not have a direct control over EV uptake. The target will be reviewed and can be further improved in line with the pace of EV adoption.

### Reduce employee Single Occupancy Vehicle (SOV) non-electric private car travel

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
68%	68%	66%	59%	64%	56%	53%

The 2022 target of a 64% SOV mode share has already been achieved with a reduction from 68% to 59% from 2016 to 2019. Therefore, a new 2024 target of 56% SOV mode share for employees has been set and a further target of 53% for 2028. The 53% reduction represents no net increase in single occupancy vehicles between 2024- 2028.



### Increase **employee** awareness of **Car Sharing**

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
N/A	27%	N/A	22%	50%	50%	60%

Awareness of the car sharing network has reduced from 27% to 22% between 2016 and 2019. The future 2024 target of 50% awareness will remain with the specific measures put in place in Section 7 to achieve this. The 2028 target has been increased to 60%.

### Target 3: Promote and Monitor Sustainable Travel at LLA

#### Secure 12% participation in the **staff travel survey**

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
10%	10%	12%	9%	12%	12%	12%

A target of retaining 12% participation in the staff travel survey has been set for 2024 and 2028. It should be noted that the actual value of 12% for 2019 performance was incorrectly stated in the previous version of the report (P04) has now been corrected to 9%.

#### Increase the number of organisations attending the **Airport Transport Forum**

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
8	8	10	10	12	15	15

Organisation participation in the Airport Transport Forum has increased from 8 organisations to 10 organisations between 2016 and 2019. A future 2024 and 2028 target of increasing to 15 organisations has been set.

#### Deliver at least 4 **promotional travel events** per year throughout the ASAS period, one per quarter

2016		2019		2022	2024	2028
Target	Performance	Target	Performance	Target	Target	Target
2	2	2	2	2	4	4

In 2019 LLA delivered 2 promotional travel events; a new target to double to 4 events per year has been set for 2024 and 2028.

#### Increase awareness of **Staff Travel Card**

2016	2019	2022	2024	2028
------	------	------	------	------

Target	Performance	Target	Performance	Target	Target	Target
53%	55%	60%	60%	65%	65%	70%

Awareness of the Staff Travelcard has increased from 55% to 60% between 2016 and 2019. The future target of 65% will remain the same in 2024 and will be increased to 70% in 2028.

### 3.3 Summary of Targets

A summary of all set targets for up to 2028 and how they compare to previous targets is shown in **Error! Reference source not found.** below.

**Table 3-1 Summary of Targets**

Target	Target 2019 (%)	Performance 2019 (%)	Target 2022 (%)	Target 2024 (%)	Target 2028 (%)	Impact
Increase passenger travel by sustainable modes of transport	34	43	36	47	47	2019 target met with an additional increase of 9%, a further ambitious increase of 4% has been set as a 2024 target to be maintained in 2028.
Increase passenger travel by bus and coach	N/A	22	17	22	22	A target of retaining the target achieved in 2019 has been set for 2024 and 2028.
Increase passenger travel by rail	N/A	21	24	25	25	An increase of 4% on the target achieved in 2019 has been set as a target for 2024 and maintained in 2028.
Increase employee travel by sustainable modes of transport	26	31	28	35	37	2019 target met with an additional increase of 5%, a further 4% increase has been set as a 2024 target. A further 2% increase target has been set for 2028.
Increase employee travel by bus and coach	N/A	16	11	17	18	An increase of 1% on the target achieved in 2019 has been set as a



Target	Target 2019 (%)	Performance 2019 (%)	Target 2022 (%)	Target 2024 (%)	Target 2028 (%)	Impact
						target for 2024 and further 1% for 2028
Increase employee travel by rail	N/A	8	9	10	10	An increase of 2% on the target achieved in 2019 has been set as a target for 2024. The target is set to be maintained in 2028
Increase employee travel by cycle	N/A	1.7	N/A	3	4	A target of achieving an increase up to 3% of staff travelling by cycle has been set for 2024. The target has been increased
Increase awareness of Cycle-to-Work scheme	N/A	46	80	80	85	A target of achieving an 80% of staff awareness of the scheme has been set for 2024 and increased to 85% in 2028.
Maintain employee walking	N/A	5	N/A	5	5	Maintaining of the 5% mode share for walking is set for 2024 and 2028
Reduce passenger, non-electric private car travel	49	40	43	40	40	2019 target met with a reduction of 9%. A target of retaining the achieved 40% by 2024 has been set. A further target of 1% reduction was set for 2028.
Reduce employee single-occupancy, non-electric private car travel	66	59	64	56	53	2019 Target met with an additional reduction of 7%. a further reduction of 3% is expected by 2024 and

Target	Target 2019 (%)	Performance 2019 (%)	Target 2022 (%)	Target 2024 (%)	Target 2028 (%)	Impact
						further 3% by 2028
Increasing Car Sharing Awareness	N/A	22	50	50	60	A target of achieving a 50% of staff awareness of the scheme has been set for 2024 and increased to 60% in 2028.
Secure minimum 12% participation in the staff travel survey	12	9	12	12	12	A target of retaining the target achieved in 2019 has been set for 2024 and 2028.
Increase the number of organisations attending the Airport Transport Forum	10	10	12	15	15	An increase of 5 additional organisations has been set for 2024 and 2028.
Deliver at least 2 promotional travel events per year	2	2	2	4	4	An increase to 1 event per quarter, for a total of 4 events per year, has been set for 2024 and 2028.
Increase in awareness of Staff Travelcard	60	60	65	65	70	An increase of 5% on the target achieved in 2019 has been set as a target for 2024 and increased to 70% in 2028.



## 4. Marketing and promotion

### 4.1 Travel Plan Coordinator

LLAOL's Travel Plan Co-ordinator (under the Surface Access team) will manage the delivery of this Travel Plan. Their role will be to develop the Travel Plan measures and identify a more detailed implementation programme.

The Travel Plan Coordinator is expected to increase awareness of sustainable travel options such as car sharing, public transport or cycling and its associated benefits.

### 4.2 Travel Information

#### Travel Information Pack

One of the key Travel Plan measures would be to introduce a Travel Information Pack to be provided to new starters. This should be updated regularly and made freely available to staff and contractors.

#### Personalised travel planning

Personalised travel planning is an approach to delivering targeted information directly to employees, to help them make sustainable travel choices. It will help discourage over-reliance on car use, enabling more journeys to be made on foot, bike, bus, train or in shared cars. It can also prevent unnecessary travel, through the provision of local or site-specific information.

The personalised travel planning will use tools and techniques such as:

- Providing links to journey planner websites, such as <http://www.traveline.info/> or <http://google-map.co.uk/route-planner/>;
- One-to-one discussion of travel needs and choices with prospective and new staff;
- The provision of information prior to occupation and on occupation; and
- Promotion of the sustainable travel incentives on occupation through regular events and marketing.

#### Influencing Travel Behaviour

In addition to the main measures detailed above, additional practical measures described below will help influence travel behaviour:

- Preparation of a Car Park Management Plan (CPMP) for 2023 to 2028 to manage car parking whilst encouraging travel by sustainable modes
- Provision of information to occupants on key bus/ train services and destinations.
- Promoting the Travel Luton journey planner <https://www.travel-luton.co.uk/>.
- Provision of public transport map showing bus service route, bus stop locations and timetables; locations of rail stations including destinations and journey times.
- Provision of maps showing walking and cycle routes.

- Provision of on-site map of local amenities in relation to the Airport.
- Provision of electric vehicle charging points for passengers (currently 10 available in MSCP1) and the potential to increase to meet demand.
- The introduction of a reduced tariff for 30 minutes (at £2.0) for electric vehicle drop off at MSCP1 to encourage the use of electric vehicles for passengers.



## 5. Travel Plan Measures

This section outlines the key measures by transport mode, to be implemented for the development site.

These measures will facilitate, promote and encourage sustainable transport choices. These are complementary to spatial planning and infrastructure provision and are aimed at encouraging smarter travel choices through promotion and encouragement, such as information provision, personalised journey planning and incentivisation. For clarity, the measures have been set out by transport mode.

As the covenanting party under the Section 106 Agreement, LLAOL is directly responsible to LBC for complying with, and achieving the targets and objectives in, this Travel Plan. As such, LLAOL takes primary responsibility for delivering and funding the measures set out in this section. However, it is acknowledged that the responsibility to deliver certain measures will be subject to co-operation from other parties, including LBC and tenants, as identified in the "Body Responsible" column.

### 5.1 Walking

**Table 5-1 Walking measures**

Measures	Passengers	Staff	Body Responsible
W1: Encourage walking to work if the staff member lives within a 30-minute walking distance.		✓	LLAOL/Tenant organisations
W2: Ensure that high quality and appropriate wayfinding is in place to guide pedestrians to transport links and key destinations. Ensure walkways are well-lit at night to ensure safe movement throughout the site.	✓	✓	Luton Borough Council/LLAOL

### 5.2 Cycling

**Table 5-2 Cycling measures**

Measures	Passengers	Staff	Body Responsible
C1: Promote safe cycling, including sale of discounted locks and safety equipment (helmets and bike lights) through local bike shops for staff.		✓	Luton Borough Council/LLAOL/Tenant organisations

Measures	Passengers	Staff	Body Responsible
C2: Promote the Cycle+ salary sacrifice scheme for staff (offering tax-free cycle purchases)		✓	LLAOL/Tenant organisations
C3: Provide an ongoing delivery of cycle events, initiatives and training, and support national events where appropriate		✓	LLAOL
C4: Incorporate secure cycle parking facilities within the design of all buildings within the site. Ensure cycle storage facilities are well lit, secure and offer protection from the weather.	✓	✓	LLAOL
C5: Ensure adequate provision of shower and changing facilities for staff commuting by bicycle		✓	LLAOL
C6: Quarterly cycle maintenance event for staff		✓	LLAOL
C7: Identifying suitable commuter cycling corridors and routes to be improved in order to encourage staff to cycle to work.		✓	LLAOL

## 5.3 Public Transport

**Table 5-3 Public transport measures**

Measures	Passengers	Staff	Body Responsible
PT1: Continue to promote local bus and coach travel and build upon previous attempts to promote the Luton Dunstable Busway	✓	✓	LLAOL/Luton Borough Council
PT2: Continue to promote and find additional incentives for the Staff Discount Travel Card		✓	LLAOL



Measures	Passengers	Staff		Body Responsible
PT3: Ensure clear signage and wayfinding guides public transport users to nearby bus stops and rail services and that it is of a high standard.	✓	✓		LLAOL/Luton Borough Council
PT5: Ensure the provision of live travel information and timetables for staff and passengers for bus stops and train times.	✓	✓		LLAOL/Luton Borough Council
PT6: Explore procurement options for a change from diesel/petrol to electric/hybrid shuttle vehicles on-site	✓	✓		LLAOL
PT7: Promotion and marketing of DART upon launch	✓	✓		LLAOL

## 5.4 Motor vehicles: Private car, servicing taxis and private hire vehicles

**Table 5-4 Private car/ freight measures**

Measures	Passengers	Staff	Body Responsible
MV1: Prepare a CPMP to control car parking in the period 2023-2028*	✓	✓	LLAOL
MV2: Provide and enforce Priority Parking areas for car-clubs and car-sharing opportunities	✓	✓	LLAOL
MV3: Explore procurement options for a change from diesel/petrol to electric/hybrid service vehicles on-site		✓	LLAOL
MV4: Introduce controls and enforcement to prevent vehicles from idling while delivering or visiting the site.	✓	✓	LLAOL
MV5: Promote taxi or ride-sharing opportunities through	✓	✓	LLAOL

Measures	Passengers	Staff	Body Responsible
the use of ride-share schemes, car clubs and app-based travel			
MV6: Personalised travel planning sessions for staff to explore sustainable travel options		✓	LLAOL/Luton Borough Council
MV7: New starters travel information packs on sustainable travel options, discounts and promotions		✓	LLAOL
MV8: Review installation of electric vehicle charging points on site	✓	✓	LLAOL

\* The updated CPMP must be submitted to the Council for approval prior to exceeding the 18mppa in any calendar year and to include as minimum:

- Details of car parking controlled by LLAOL
- Measures to monitor capacity of those car parks
- Measures to encourage staff and passengers to reduce reliance upon private vehicle use and in particular SOV use
- Such measures may include car parking product strategies, car sharing initiatives and active advertising of alternative means of accessing the airport

## 5.5 Electric Vehicles

**Table 5-5 Electric vehicle measures**

Measures	Passengers	Staff	Body Responsible
EV1: Monitor usage of existing charging points for electric vehicles (currently 10 charging points available)	✓	✓	LLAOL
EV2: Promote the use of electric vehicle facilities	✓	✓	LLAOL
EV3: Review the potential installation of additional electric vehicle charging points depending on increasing demand.	✓	✓	LLAOL
EV4: The introduction of pricing incentives (such as the "electric vehicle drop-off tariff") for EVs where	✓		LLAOL



<b>Measures</b>	<b>Passengers</b>	<b>Staff</b>	<b>Body Responsible</b>
appropriate without compromising the uptake of public transport and active travel.			

## 6. Monitoring and Evaluation

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Monitoring ensures the impact and success of the Travel Plan can be measured and determine if the objectives and targets are being met.

### 6.1 Monitoring Programme

A monitoring programme will be discussed and agreed between the Travel Plan coordinator (TPC) and Luton Borough Council (LBC). Continuous monitoring of the Travel Plan, in parallel with the bi-annual Airport Transport Forum will assess:

- Progress against the SMART targets of the Travel Plan
- The need for refinements to the Travel Plan; and
- The effectiveness of the Travel Plan for encouraging sustainable travel.

### 6.2 Regular Informal Monitoring

In addition to formal monitoring, the Travel Plan coordinator will monitor the various Travel Plan measures, such as:

- Levels of bus patronage at bus stops in close proximity to the site access.
- The use of specific schemes and measures including car sharing and cycle parking facilities; and
- Levels of participation in travel plan coordinator-led promotional events.

### 6.3 Monitoring report

The results of the monitoring will be submitted to LBC within three months of the surveys, along with a review document highlighting areas of success and concern. This will evaluate progress against actions and targets and identify issues and remedial actions such as:

- Review of bus services – vehicle type, routes and or/frequencies; and
- Identification of targeted promotional activities.

Any proposed changes will be discussed with LBC and implemented by the site travel plan coordinator accordingly.

### 6.4 Review

The Travel Plan should be reviewed on the basis of the results of the monitoring surveys against the baseline data and the identified targets. Where elements of the Travel Plan are identified to be underperforming, these would need to be reviewed and revised as appropriate, for implementation by the TPC.

Regular monitoring will be carried out to identify progress of the travel plan which in turn will allow us to be proactive rather than reactive in developing various measures etc.



It is proposed that penalties should be imposed on the Airport by LBC where no significant progress has been made against Travel Plan actions and no valid justification has been provided for failing to meet an action's target date.

The penalties for not completing actions should be proportionate to the cost of the action which has not been completed, so that the Airport has no financial incentive for avoiding Travel Plan actions. It is proposed that the penalties should be:

- The Airport taking a new, replacement action to promote sustainable travel; or
- The Airport spending additional money to promote sustainable travel beyond its existing Travel Plan commitment.

It is important that targets and penalties are founded on actions that are within the Airport's control. The Airport can influence but cannot control the travel behaviour of passengers and staff, or the services of bus and train operators. Passenger travel behaviour is subject to external factors such as demand for air travel and the mix of passenger types that the Airport's airlines attract. Staff travel behaviour is also subject to external factors, and it is noted that the majority of staff at the Airport are not employed by LLAOL.

The Travel Plan will be reviewed and reported on in accordance with Schedules 2 and 7 of the Section 106 Agreement.

## 7. Action Plan

The Action Plan has been produced to summarise how the elements of the Travel Plan will be implemented. This will ensure that targets are met for 2024 and 2028 and in subsequent revisions to future travel plans. It should be noted that the timescales for implementation are indicative only and some of the medium/ long term measures can be brought forward if required.

Timescales are defined as short term (0-1 years), medium term (1 -3 years) and long term (3 – 5 years).

**Table 7-1 Action Plan**

Measure	Timescale (Short/Med/Long)
W1: Encourage walking to work if the staff member lives within a 30-minute walking distance.	Short
W2: Ensure that high quality and appropriate wayfinding is in place to guide pedestrians to transport links and key destinations. Ensure walkways are well-lit at night to ensure safe movement throughout the site.	Short
C1: Promote safe cycling, including sale of discounted locks and safety equipment (helmets and bike lights) through local bike shops for staff.	Short
C2: Promote the Cycle+ salary sacrifice scheme for staff (offering tax-free cycle purchases)	Short
C3: Provide an ongoing delivery of cycle events, initiatives and training, and support national events where appropriate	Short
C4: Incorporate secure cycle parking facilities within the design of all buildings within the site. Ensure cycle storage facilities are well lit, secure and offer protection from the weather.	Short/ Medium
C5: Ensure adequate provision of shower and changing facilities for staff commuting by bicycle	Short/ Medium
C6: Quarterly cycle maintenance event for staff	Short
C7: Identifying suitable commuter cycling corridors and routes to be improved in order to encourage staff to cycle to work.	Short/ Medium
PT1: Continue to promote local bus and coach travel and build upon previous attempts to promote the Luton Dunstable Busway	Short
PT2: Continue to promote the Staff Discount Travel Card	Short



Measure	Timescale (Short/Med/Long)
PT3: Ensure clear signage and wayfinding guides public transport users to nearby bus stops and rail services and that it is of a high standard.	Short
PT5: Ensuring the provision of live travel information and timetables for staff and passengers for bus stops and train times.	Short
PT6: Explore procurement options for a change from diesel/petrol to electric/hybrid shuttle vehicles on-site	Medium
PT7: Promotion and marketing of DART upon launch	Short / Medium / Long
MV1: Prepare a CPMP to control car parking in the period 2023-2028	Short
MV2: Provide and enforce Priority Parking areas for car-clubs and car-sharing opportunities	Short
MV2: Explore procurement options for a change from diesel/petrol to electric/hybrid service vehicles on-site	Medium
MV4: Introduce controls and enforcement to prevent vehicles from idling while delivering or visiting the site.	Short
MV5: Promote taxi or ride-sharing opportunities through the use of ride-share schemes, car clubs and app-based travel	Short
MV6: Personalised travel planning sessions for staff to explore sustainable travel options	Short
MV7: New starters travel information packs on sustainable travel options, discounts and promotions	Short
MV8: Review current provision and potential installation of additional electric charging points for passengers.	Short
EV1: Monitor usage of existing charging points for electric vehicles (currently 10 charging points available)	Short
EV2: Promote the use of electric vehicle facilities	Short
EV3: Review the potential installation of additional electric vehicle charging points depending on increasing demand.	Short
EV4: The introduction of pricing incentives (such as the "electric vehicle drop-off tariff") for EVs where appropriate without compromising the uptake of public transport and active travel.	Short







**ANNEXURE 4  
OUTLINE CARBON REDUCTION PLAN**







London Luton Airport

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London Luton Airport Operations Limited

## London Luton Airport 19 mppa

Outline Carbon Reduction Plan





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## Document revisions

No.	Details	Date
1	Draft v1	05/03/21
2	Draft v2	08/03/21
3	Draft v3	26/03/21
4	Draft v4	12/04/21
5	Final	21/05/21

## Executive summary

This outline Carbon Reduction Plan (CRP) is presented to confirm the steps London Luton Airport Operations Ltd (LLAOL) has taken, and continues to take, to achieve carbon neutrality by 2026 and deliver net zero carbon for London Luton Airport's (LLA) direct operational emissions by 2040. This is consistent with Luton Borough Council (LBC) aims to be a carbon neutral borough by 2040<sup>1</sup>, and with the UK's Government carbon reduction targets as set out in the Climate Change Act (as amended), "to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline". The outline CRP also supports legislation being introduced by the UK Government for its 6<sup>th</sup> Carbon Budget to achieve a 78% reduction target by 2035 for carbon emissions, compared to 1990 levels<sup>2</sup>, through measures that would support a reduction in LLA's indirect carbon emissions related to surface access and aviation emissions.

The CRP is being provided in outline to inform LLAOL's planning application to LBC to lift the current 18 million passengers per annum (mppa) cap for LLA to 19 mppa. Recognising the need to implement tangible measures for carbon reduction, LLAOL has committed to develop a detailed Carbon Reduction Plan that builds on this outline plan, by the end of 2022, which will provide detailed and viable targets for an absolute reduction in carbon emissions and achieving net zero.

LLAOL's key partners in developing an integrated carbon management strategy for LLA are the airport landowners, London Luton Airport Ltd (LLAL), LLAL's owners, LBC and the airlines. As operator of the airport under the concession agreement to 2031, LLAOL has a primary role in reducing carbon emissions from operational activities at LLA, and an enabling role to support LLAL, LBC and airline operators in the reduction of the airport's most significant emissions from surface access transportation and aviation flights. Measures to reduce carbon in the outline CRP are focussed on LLAOL's role as the airport operator up to the end of the current concession agreement in 2031, but acknowledges that no single body has responsibility for emissions at the airport, and highlights areas where a collaborative approach by LLAOL with other stakeholders will be required to achieve net zero carbon.

The outline CRP incorporates existing targets for carbon reduction measures included in LLAOL's Responsible Business Strategy (RBS), published in 2019<sup>3</sup>, which established the overarching aim for LLAOL to achieve the UK net zero target for 2050 and to review the net zero target annually with the aim to achieve this sooner than 2050. Further to this, the outline CRP has developed a series of additional measures targeted at achieving carbon neutrality for LLA by 2026 and net zero for LLA's direct operational emissions by 2040, along with measures that support a reduction in third party emissions related to aviation and surface access. Headline descriptions of the additional measures proposed in the outline CRP covering short, medium and long term timescales are provided in the tables below, along with a summary of the targets listed in the RBS (noting the need to focus on short to medium term actions that will support the UK Government's national 78% carbon reduction target by 2035, and that responsibility for measures beyond 2031 are outside of LLAOL's scope).



### LLAOL Responsible Business Strategy (2019) – Carbon Mitigation Targets:

- Achieve UK net zero target for 2050 and review the net zero target annually with the aim to achieve this sooner than 2050;
- Establish a plan for low-carbon airside and landside vehicles by mid-2021 (including potential savings for a full fleet of electric vehicles using renewable electricity);
- Source 100% of purchased electricity from renewable sources by end of 2021;
- Reduce operational electricity demand (excluding vehicles) to less than 2.0 kWh/pax by end of 2023;
- Reduce single occupancy vehicle travel to the airport (employees: 2022 = 64%);
- Greater than 28% of employees travelling to and from the airport using sustainable modes of transport by 2022;
- Promote and monitor sustainable travel for staff at the airport, including promoting cycling schemes, discounted travelcards for public transport and car sharing;
- Secure 12% participation in the staff travel survey by 2020 and increase the number of organisations attending the airport travel forum (12 by 2022);
- Reduce single occupancy vehicle travel to the airport (customers: 2022 = 47%);
- Greater than 36% of customers travelling to and from the airport using sustainable modes of transport by 2022;
- Assess if slightly steeper approaches can be adopted and implement recommendations by 2023;
- Airport Carbon Accreditation (ACA) scheme – achieve ‘Reduction’ level by 2022 (carbon management towards a reduced carbon footprint); and
- Supply at least 25% of energy used by the airport (or by LLAOL) from on-site renewables by end of 2026.

#### Short Term (2020-2025) mitigation measures additional to RBS targets for achieving net zero carbon by 2050

Source electricity from renewable sources and review options with LLAL and LBC for increasing on-site renewable energy generation, and opportunities for linking to local off-site renewable generation

Setting a 5-year carbon reduction target and strategy, which will be reviewed annually and incorporated into LLAOL's strategic business plans

Achieve Airport Carbon Accreditation Level 3 ‘Optimisation’ through engagement with third parties in carbon footprint management

Continue with the programme of introducing energy efficient equipment and behaviours to reduce energy consumption and GHG emissions

Review of energy data and Building Management Systems (BMS) to inform carbon management strategies and identify opportunities for energy savings

Promote the use of sustainable travel for passengers and staff using the airport, with targets for reducing the use of single occupancy vehicle travel and increased use of sustainable transport, including the Luton DART

Establish a programme for the phased electrification of airside vehicles

Work with LLAL to conduct feasibility assessments and review of funding models for the provision of electrical vehicle charging infrastructure, based on expected demand and charging patterns (noting the UK Government's policy to phase out the sale of new petrol and diesel cars in the UK by 2030<sup>14</sup>).

In conjunction with LLAL and airlines, create a working group with academia and innovators to seek solutions for sustainable aviation and the decarbonisation of energy use for the airport (noting the inclusion of international aviation emissions in legislation being introduced for the UK's 6<sup>th</sup> Carbon Budget<sup>2</sup>)

Work with airlines to promote and incentivise low-carbon techniques during landing and take-off operations, including single-engine taxiing and continuous decent approach

**Medium Term (2026-2031) mitigation measures additional to RBS targets for achieving net zero carbon by 2050**

Work with LLAL to increase the generation of electricity used to supply LLA operational requirements from on-site renewables to 50% by 2030,

Facilitate options for low carbon technology, including alternatives to gas for heating requirements and review developments in the application of hydrogen-based energy infrastructure

In partnership with LLAL and LBC provide 40 to 60 electric vehicle charging points by 2030 to decarbonise energy supplies, ensuring the strategic location of infrastructure to match the progressive demand for electric vehicle capacity

Update surface access strategy and targets for staff and passengers using sustainable modes of transport for travel to and from the airport

Review scope to reduce embodied and operational carbon in development projects

Work with airlines, LLAL and the innovation working group to help facilitate the uptake of low-carbon flights, including infrastructure requirements for energy and fuel supplies, focusing on sustainable aviation fuels for international flights and LLA domestic aviation and short haul flights as the likely forerunners for development of hybrid-electric flights

Achieve carbon neutrality for LLA's direct emissions by 2026, through offsetting residual carbon emissions and achieving ACA Level 3+ 'Neutrality' (the fourth ACA Accreditation level).

**Long Term (2032-2050) – Indicative mitigation measures for achieving net zero carbon by 2050**

Achieve net zero carbon for London Luton Airport's Scope 1 and 2 operational emissions by 2040, and achieve significant reductions associated with surface access and aviation emissions, within the airport's sphere of influence

Review the feasibility of investing in on-site renewable and low-carbon energy generation to reduce reliance on energy from grid supplies

Review of surface access strategy to support sustainable transport, including capacity requirements for public transport and low-carbon vehicle use

Implement infrastructure to meet demand for low carbon aircraft

Progress to the advanced levels of the ACA scheme, achieving Level 4 'Transformation' and Level 4+ 'Transition'

Address any residual carbon emissions for the airport, using approved carbon removal schemes to achieve net zero carbon for the airport's emissions



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# 1 Introduction

## 1.1 Achieving Net Zero Carbon for London Luton Airport

The purpose of this Outline Carbon Reduction Plan (CRP) is to confirm the steps London Luton Airport Operations Ltd (LLAOL) is taking to ensure that their operations are consistent with not only the UK Government's legislated target as set out in the Climate Change Act (as amended), "to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline" but also the ambitions of Luton Borough Council (LBC) to achieve net zero carbon by 2040<sup>1</sup>. The outline CRP also supports legislation being introduced by the UK Government for its 6<sup>th</sup> Carbon Budget to achieve a 78% reduction target by 2035 for carbon emissions, compared to 1990 levels<sup>2</sup>, through measures that would support a reduction in LLA's indirect carbon emissions related to surface access and aviation emissions.

As stated in LLAOL's Responsible Business Strategy published in 2019<sup>3</sup>, LLAOL is committed to supporting the Government in achieving its 2050 net zero target. Further to this, and in support of LBC's targets for net zero, the Outline CRP provides the framework for the future detailed CRP to support LLAOL achieve carbon neutrality for the airport's direct emissions by 2026 and net zero by 2040. The Outline CRP explains the actions that LLAOL can commit to, in support of the below mentioned planning application, to establish the foundations for a detailed CRP for the airport. The CRP focusses on LLAOL's role as the airport operator, but also highlights areas where a joined-up approach with other stakeholders will be required to achieve net zero carbon. In developing the Outline CRP there are a number of uncertainties that affect the level of detail that can be provided in defining measures for reducing carbon emissions beyond the short term (i.e. 2025). These include the timescales of LLAOL's concession agreement up to 2031, the landowners London Luton Airport Limited (LLAL) proposals for expansion of the airport's capacity to 32mppa, and anticipated technological developments in the aviation sector, particularly relating to future aircraft.

LLAOL are committed to ensuring operations at London Luton Airport (LLA) are compatible with delivering net zero for the airport's direct operational emissions by 2040. The CRP is being provided in outline to inform LLAOL's planning application LBC to lift the current 18 million passengers per annum (mppa) cap for LLA to 19 mppa. Further to this, LLAOL has committed to develop a detailed Carbon Reduction Plan, that will build on this outline plan, by the end of 2022 which will provide detailed targets for an absolute reduction in carbon emissions and achieving net zero for LLA's direct operational emissions by 2040. LLAOL will not do this in isolation; the detailed CRP will be based on collaboration with relevant stakeholders and due consideration of responsibilities and investment requirements to meet the stated timeline and the associated works of the Planning Application.

## 1.2 London Luton Airport 19 mppa Proposals

By way of background, in 2014 planning permission was granted for London Luton Airport (ref: 12/01400/FUL), limiting the airport to 18 million passengers per annum (mppa), which was expected to be reached by 2026/2027. According to the London Luton Airport Vision for Sustainable Growth 2020-2050<sup>4</sup>, the forecasts for LLA anticipated that the 18 mppa capacity was expected to be fully utilised by 2020. However, LLA reached the 18 mppa cap during 2019<sup>5</sup>, almost a decade earlier than previously forecast. LLAOL has therefore submitted a planning application to increase the 18 mppa cap to a 19 mppa cap.

<sup>1</sup> Luton Borough Council, (2019). Climate change action plan: Becoming a carbon neutral borough by 2040.

<sup>2</sup> UK Government, (2021). UK Draft Statutory Instrument 2021 No. Climate Change, The Carbon Budget Order 2021 (and Draft Explanatory Memorandum) [online]. Available at: <https://www.legislation.gov.uk/ukdsi/2021/9780348222616>

<sup>3</sup> London Luton Airport (2019). Our Responsible Business Strategy 2020-2025

<sup>4</sup> London Luton Airport Ltd (n.d.). London Luton Airport Vision for Sustainable Growth 2020 – 2050, [online]. Available at: <https://www.llal.org.uk/Documents/vision2020-2050.pdf>

<sup>5</sup> London Luton Airport Operations Limited (LLAOL), (2019). Carbon footprint report. [online]. Available at: <https://www.londonluton.co.uk/LondonLuton/files/50/50af686c-fae-49fd-981d-180f588dd5d6.pdf>



The 2020 Environmental Statement<sup>6</sup> (ES) submitted to evaluate the impact of the proposals for expansion of the airport to 19 mppa included an assessment of the likely significant effects of the proposals with respect to climate (Chapter 7 of the ES). Within the Climate chapter, reference is made to LLAOL's commitment to the UK net zero target for 2050, and the development an outline CRP during the consideration of the ES that would identify how residual carbon emissions associated with the 19 mppa proposals would be reduced to net zero:

*7.13.2 A Carbon Reduction Plan will be produced which will set out the roadmap for achieving a net zero airport for Scope 1 and 2 emissions, as well as indicating the approaches by which LLAOL can influence Scope 3 emissions. An outline version of the Carbon Reduction Plan will be set out ahead of the determination of the planning application by LBC.*

*7.13.4 Through the Responsible Business Strategy, LLAOL has committed to being aligned with the UK net zero target for 2050. LLAOL has therefore committed to develop a Carbon Reduction Plan, which will set out the ambition and actions required for ensuring LLA's Scope 1 and 2 emissions are in-line with the UK net zero 2050 target. An outline version of the Carbon Reduction Plan will be produced during consideration of the ES, and ahead of determination of the planning application. The full version would be provided following planning approval, as a time-bound condition of the planning permission.*

This outline CRP responds directly to the above statement made in the ES in providing the platform from which LLAOL will provide a detailed CRP, also noting that the CRP will define measures to achieve net zero for LLA's direct operational (Scope 1 and 2) emissions by 2040 rather than 2050.

#### **UK targets for international aviation emissions**

With respect to international aviation, Chapter 7 of the ES assessed that the 19 mppa proposals were unlikely to materially affect the ability of the UK Government to meet the 37.5 MtCO<sub>2</sub>/yr 'planning assumption' for UK international aviation GHG emissions in 2050. In addition, the ES included sensitivity analysis with respect to a 23 MtCO<sub>2e</sub>/yr target for 2050 based on recommendations for a lower UK aviation sector target made in the December 2020 Climate Change Committee (CCC) 6<sup>th</sup> Carbon Budget report for Aviation (<https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Aviation.pdf>), based on the CCC's Balanced Pathway scenario. The ES found that given national and aviation sector ambition and associated implementation of aviation policy, the share of LLA's aviation emissions under a 19 mppa proposal would be unlikely to increase compared to the 2019 baseline. It should be noted that domestic aviation was included in the contextualisation against UK carbon budgets within the ES.

It is noted that the UK Government is currently developing policy on aviation emissions guided by advice in the CCC's 6<sup>th</sup> Carbon Budget Report. In line with the CCC's recommendations the UK Government has announced that the 6<sup>th</sup> Carbon Budget for the 2033-2037 budgetary period is 965,000,000 tonnes of carbon dioxide equivalent, with a target to reduce the UK's emissions by 78% by 2035 compared to 1990 levels, and for the first time will incorporate the UK's share of international aviation and shipping emissions<sup>2</sup>. Further details on policy and sectoral targets required to meet the 6<sup>th</sup> Carbon Budget are expected to be contained within the UK's Aviation Decarbonisation Strategy, anticipated to be released later in 2021. The CCC has advised that additional aviation policy implementation, including development of new aviation technologies such as sustainable aviation fuel (SAF) and aircraft efficiency measures, are needed in order for the aviation sector to achieve the recommended 6<sup>th</sup> carbon budget. The Jet Zero Council has guided this with initial investment in a number of aviation projects which will support the whole aviation sector. LLAOL is committed to continuous review of its Carbon Reduction Plan in line with sector best practice and current policy, and to work with airlines in reducing their aviation emissions. In line with the need for ongoing review of new policy, including legislation of the 6<sup>th</sup> Carbon Budget and any associated policy (still to be confirmed), these would be incorporated, where relevant, into further iterations of LLAOL's Carbon Reduction Plan.

<sup>6</sup> Wood (2022). Luton Airport Expansion - 19 mppa, Environmental Impact Assessment, Volume 2: Environmental Statement Addendum. [online] Available at: [https://planning.luton.gov.uk/online-applications/files/EB44765ED7F038BBB48E57D636486B81/pdf/21\\_00031\\_VARCON-DC07\\_2021-00031\\_Volume\\_2\\_Environmental\\_Statement-908779.pdf](https://planning.luton.gov.uk/online-applications/files/EB44765ED7F038BBB48E57D636486B81/pdf/21_00031_VARCON-DC07_2021-00031_Volume_2_Environmental_Statement-908779.pdf)







## 2 Carbon Management at London Luton Airport

### 2.1 Overview of LLAOL Carbon Management

London Luton Airport Operations Ltd (LLAOL) is committed to achieving carbon neutrality by 2026 and to reaching net zero carbon by 2040 across the direct operations (Scope 1 and 2), and to working with partners to support carbon reduction in areas outside of LLAOL’s direct control (Scope 3). To support this commitment LLAOL has implemented measures that deliver a reduction in its operational emissions and has identified further reductions in its Responsible Business Strategy (RBS) 2020-2025<sup>3</sup>. The RBS confirmed LLAOL’s commitment to be aligned with the UK net zero target for 2050 and to review opportunities to achieve this sooner (which it is seeking to achieve through measures being developed in the CRP). In support of this, the RBS includes measures for reducing LLAOL’s direct operational emissions, along with proposals that would reduce emissions outside its immediate area of operations. Figure 1 below represents the path LLAOL is taking within the scope of its current concession agreement, to ensure net zero is achieved for LLA, highlighting key milestones for the future (upper section), along with related policy and legislative drivers (lower section).

Figure 1 2050 net zero timeline including carbon mitigation measures within LLAOL’s concession to 2031

#### Carbon Mitigation Measures



#### Policy & Legislative Drivers

\*UK NDC: On 12 December 2020, the UK communicated its new Nationally Determined Contribution (NDC) under the Paris Agreement to the United Nations Framework Convention on Climate Change (UNFCCC). The NDC commits the UK to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990

## 2.2 Baseline Carbon Emissions

The current baseline for London Luton Airport's carbon emissions is summarised in Table 2.1. For consistency with the 19 mppa Environmental Statement Climate chapter this presents the total carbon emissions for London Luton Airport in 2019<sup>6</sup>, noting that this incorporates emissions associated with the whole airport, including sources that LLAOL has the ability to influence, such as aviation emissions and surface access journeys for staff and passengers accessing the airport (e.g. by road and rail). Additional differentiation of emissions sources contributing to the 2019 baseline is provided in Table 2.1 to aid transparency in identifying LLAOL's Scope 1, 2 and 3 emissions.

The summary highlights that the emissions where LLAOL has most control (Scope 1 and 2) account for <1% of the total carbon emissions attributable to London Luton Airport, with electricity use presenting the most significant opportunity for reduction in operational emissions. Although surface access emissions (27% of emissions) are not within LLAOL's direct control it is acknowledged that LLAOL, in collaboration with other stakeholders, can influence both passenger and staff travel to the airport, for example through the development of a surface access travel plan for the airport and infrastructure investment, such as the Luton DART (Direct Air-Rail Transit). As may be expected aviation emissions represent the largest source of emissions for the airport (72% of emissions); for these emissions LLAOL has the greatest influence on sources related to the Landing and Take-Off cycle (LTO, 9% of emissions). Emissions for aircraft at cruising altitudes (63% of emissions) are predominantly controlled by carbon reduction mechanisms governing airlines, such as the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) and the emerging UK Emission Trading Scheme (ETS). However, LLAOL does have an enabling role in working with airlines to reduce their aviation emissions, both through its 'Conditions of Use' policies and in supporting the uptake of lower carbon aviation technologies, considering opportunities such as those proposed in the Sustainable Aviation decarbonisation road map<sup>9</sup>.

Table 2.1 London Luton Airport GHG emissions/year for the 2019 baseline

Source	Activity	London Luton Airport 2019 (baseline) (ktCO <sub>2</sub> e/yr) <sup>a</sup>	% of Total	GHG Scope
Aviation	International aviation	Landing and Take-Off: 117.97	7.89%	Scope 3
		Cruising Phase: 915.86	61.25%	
	Domestic aviation	Landing and Take-Off: 10.99	0.73%	Scope 3
		Cruising Phase: 30.87	2.06%	
Surface access	Passengers	396.06	26.49%	Scope 3
	Employees (airport total)	9.69 <sup>b</sup>		
		LLAOL: 1.11 <sup>c</sup>	0.07%	Scope 3
Airport buildings and ground operations	Grid electricity	10.1		
		Airport: 4.98 <sup>d</sup>	0.33%	Scope 2
		Tenant/Transmission & Distribution: 5.12 <sup>d</sup>	0.34%	Scope 3
	Gas usage	1.5	0.10%	Scope 1
	Diesel (heating)	0.1	0.01%	Scope 1
	Diesel (power)	0.1	0.01%	Scope 1
	Diesel (vehicles LLAOL)	1.08	0.07%	Scope 1
	Diesel (vehicles third party)	0.67	0.04%	Scope 3
Refrigerants	0.27	0.02%	Scope 1	
<b>Total</b>		<b>1,495.26</b>		

<sup>a</sup> Emissions are quoted in units ktCO<sub>2</sub>e/yr unless otherwise stated for aviation emissions which are reported in ktCO<sub>2</sub>/yr

<sup>9</sup> Sustainable Aviation (2020). Sustainable Aviation Carbon Road-Map: A path to Net Zero



<sup>b</sup> Emissions based on commuting journeys for a total of 10,935 full and part time staff, including non-LLAOL staff

<sup>c</sup> Emissions based on business travel and staff commute for 821 full and part time staff (London Luton Airport Footprint 2019<sup>20</sup>)

<sup>d</sup> Emissions based on split of airport, tenant and T&D electricity consumption (London Luton Airport Footprint 2019<sup>20</sup>)

## 2.3 Existing Carbon Reduction Performance

LLAOL has achieved around a 35% reduction in the airport's absolute carbon emissions from 2016-2019 despite a passenger increase of 23%. LLAOL started calculating scope 3 emissions in 2018 and has seen a decrease of 6% between 2018 and 2019 (scope 3 data will be published as part of 2021 sustainability report). LLAOL has implemented a number of carbon mitigation measures that has helped to manage and reduce carbon emissions for the airport, including the following:

- achieved Level 1 'Mapping' certification within the ACA Scheme in December 2019;
- installation of air handling unit upgrades saving over 1.3 million kWh per year;
- upgrading boilers, reducing gas consumption by 16%;
- installation of LED lighting, reducing electricity demand by over 1 million kWh per year; and
- achieved compliance rate with emissions-reducing Continuous Descent Approach of 91%.

Further to this, LLAOL has identified a series of ongoing carbon reduction targets in its Responsible Business Strategy 2020-2025 (published in 2019). These describe targets LLAOL is committed to in the short term, which include measures to address Scope 3 emissions related to surface access and aviation:

- achieve ACA Level 2 'Reduction' by 2022;
- sourcing all purchased electricity from 100% renewable sources by the end of 2021;
- generating at least 25% of electricity demand from on-site renewables by 2026;
- reducing operational electricity demand (excluding vehicles) to less than 2.0 kWh/pax by end of 2023;
- promote and monitor sustainable travel at the airport;
- reduce single occupancy vehicle travel to the airport for customers and employees (employees to 64%, and passengers to 47% by 2022);
- greater than 28% of employees and 36% of passengers travelling to and from the airport using sustainable modes of transport by 2022;
- establish a plan for low-carbon airside and landside vehicles by mid-2021; and
- assess if steeper approaches can be adopted and implement recommendations by 2023.

## 2.4 Related Carbon Management Strategies

LLAOL's key partners in developing an integrated carbon management strategy for London Luton Airport are the airport landowners, London Luton Airport Ltd (LLAL), LLAL's owners, Luton Borough Council (LBC) and the airlines. In addition to LLAOL's Responsible Business Strategy, and initiatives being progressed through the ACA scheme, LLAL and LBC have set out strategies that have been considered with respect to LLAOL's own strategy to achieve net zero.

<sup>20</sup> Ricardo Energy and Environment (2021), London Luton Airport Footprint 2019

### Luton Borough Council (LBC)

The LBC climate change action plan<sup>1</sup> sets out a commitment that LBC will aim “for net zero carbon in advance of the national target in 2050”. LBC has an ambition for the Borough to be carbon neutral by 2040. Although this strategy does not specifically mention aviation, London Luton Airport is described as a partner in some of the targets and LLAOL will work with LBC on ways to support this aim. Emerging policies from the action plan relating to GHG emissions at London Luton Airport include investigating:

- introduction of a workplace parking levy to secure investment in sustainable transport;
- setting up a council PV company to install renewable technologies (PV panels) at suitable private properties; and
- creation of a local community carbon offsetting mechanism to channel funds for local energy efficiency measures.

Since LBC’s climate action plan was published further progress has been made on measuring current emissions across Luton and expanding the commitment to be a ‘carbon neutral town’ by 2040. In January 2020, LBC set out in an executive report that it will work with LLAL and LLAOL to work towards net zero carbon by 2040 and published a climate change report as an evidence base of current GHG emissions<sup>11</sup>.

### London Luton Airport Ltd (LLAL)

LLAL published a report in 2017 setting out a vision for sustainable growth of London Luton Airport through to 2050<sup>12</sup>. The report recognises that the airport “has a significant influence over factors that contribute to it, such as: emissions from aircraft; vehicle trips; and those associated with the activities of other companies operating at the airport.” It commits LLAL to developing a comprehensive strategy to reduce carbon emissions where possible prior to future expansion work. In support of LLAL’s commitment LLAOL is actively working on measures targeting emissions from its direct operations and emissions linked to other sources for the airport.

LLAL’s 2019 Sustainability Strategy<sup>13</sup> provides an overarching framework to address the contribution of LLAL’s properties and activities where it has direct or indirect control, aligned with nine key themes for sustainability, including ‘Carbon and Energy’ and ‘Surface Access’. The Sustainability Strategy confirms that LLAOL was engaged in the development of measurable actions, with a series of shorter-term targets relevant to LLAOL in line with its RBS, and also longer term targets with dates set beyond the current concession agreement.

As part of its commitment to continual review LLAL is in the process of updating its Sustainability Strategy, which would support LLAL’s ambition to make London Luton the UK’s most sustainable airport over the next 20 years. A preview of proposed strategies for carbon mitigation has been provided to inform this outline CRP, which LLAOL will need to consider further for a detailed CRP.

<sup>11</sup> Luton Borough Council/Anthesis (2020). Climate Action Plan Support.

<sup>12</sup> London Luton Airport Ltd., (2017). London Luton Airport Vision for Sustainable Growth 2020-2050.

<sup>13</sup> London Luton Airport Ltd., (2019). London Luton Airport Limited, Sustainability Strategy.



## 3 Scope of the Outline Carbon Reduction Plan

### 3.1 Areas for mitigation

This outline CRP sets out LLAOL's framework to progressing towards a clear roadmap to achieving net zero. The outline CRP identifies areas to be targeted for carbon reduction, with credible mitigation measures being considered by LLAOL at this stage, along with indicative timescales and relevant stakeholders. The principle adopted for mitigation measures is to focus on achieving a reduction in energy consumption and emissions before considering mechanisms for addressing residual emissions in support of the net zero target. The development of detailed actions, commitments and targets is subject to further consideration of the strategy for London Luton Airport, which would be defined in the detailed CRP.

Areas for mitigation have been aligned with the GHG Protocol Scope 1, 2 and 3 definitions listed in Section 1.3. Although the GHG Protocol does not prescribe activities that should be reported under Scope 3 the ACA scheme identifies good practice for categorising Scope 3 emissions at an airport level, which have been applied to the CRP. The following areas have been identified within LLAOL's sphere of control or influence for proposals to mitigate operational emissions:

- Scope 1 and 2:
  - ▶ Energy efficiency and reduction
  - ▶ Energy procurement
  - ▶ Use of renewables and/or low carbon technologies
  - ▶ Operational vehicles
- Scope 3:
  - ▶ Surface access – staff travel
  - ▶ Surface access – passenger travel
  - ▶ Electric vehicle charging
  - ▶ Aviation operations, including landing and take-off cycle and fixed electric ground power (FEGP)
  - ▶ Support to airline sustainable aviation strategies for decarbonisation

Additional mitigation areas addressed within the CRP with potential for cross-over in terms of the GHG scope categories are:

- establishing systems for measuring, monitoring and reporting, including setting KPIs;
- measures to reduce embedded and operational carbon associated with construction projects, particularly noting LLAL's proposals for expansion of the airport's capacity; and
- valid options to address residual emissions through carbon offsetting or other carbon removal mechanisms.

A summary of the sources for carbon reduction in terms of London Luton Airport's baseline emissions for 2019 and LLAOL's ability to implement measures that control or influence the sources of emissions is presented in Table 3.1.

Table 3.1 Priority sources for carbon mitigation in the Carbon Reduction Plan

Source	London Luton Airport 2019 carbon footprint	Stakeholder input
Airport buildings (Scope 1 & 2)	Low	Low
Ground operations (Scope 1 & 2)	Low	Low
Surface access – staff (Scope 3)	Very Low	Medium
Surface access – passengers (Scope 3)	High	High
Domestic aviation (Scope 3)	High	High
International aviation* (Scope 3)	Very High	Very High

\* Mitigation of carbon emissions associated with international aviation routes are primarily governed by CORSIA, which will become mandatory in 2027.

## 3.2 Timescales

Due to the range of emissions sources the CRP is seeking to address, and future uncertainties in LLA operations, technology developments and aviation policy, the measures proposed for reducing carbon emissions have been allotted according to short, medium and long term timescales, covering the period up to 2050. These categories are defined by LLAOL's current known milestones and ability to determine its remit for future operational activities at the airport.

**Short Term (2020-2025):** mitigations included for the short term are predominantly those in-line with LLAOL's Responsible Business Strategy addressing sources of Scope 1, 2 and 3 carbon emissions, which have been approved by LLAOL's management board and are budgeted within the business plan. Additional measures are proposed within this timeframe that provide the foundations for future actions.

**Medium Term (2026-2031):** the stage up to 2031 covers LLAOL's current Concession Agreement for managing airport operations. It represents a potential transition period, not only in terms of LLAOL's operational responsibilities and pre-emptive actions supporting a reduction in surface access and aviation emissions, but may also be the period where infrastructure requirements for significant expansion of the airport with respect to LLAL's proposals for expansion of the airport's capacity are established. Mitigation measures are proposed that will continue to deliver a reduction in carbon emissions within LLAOL's direct control (Scope 1 & 2) and influence (Scope 3).

**Long Term (2032-2050):** achieving net zero carbon emissions by 2040 across LLA's direct operations is LLAOL's ultimate aim for managing carbon at the airport, although it is recognised by LLAOL and LLAL that this period extends beyond the current scope for LLAOL to make commitments. During this period there will be a need for ongoing review of opportunities to reduce operational carbon as technology develops, with actions increasingly likely to be focussed on the mitigation of Scope 3 emissions and mechanisms for addressing residual emissions.

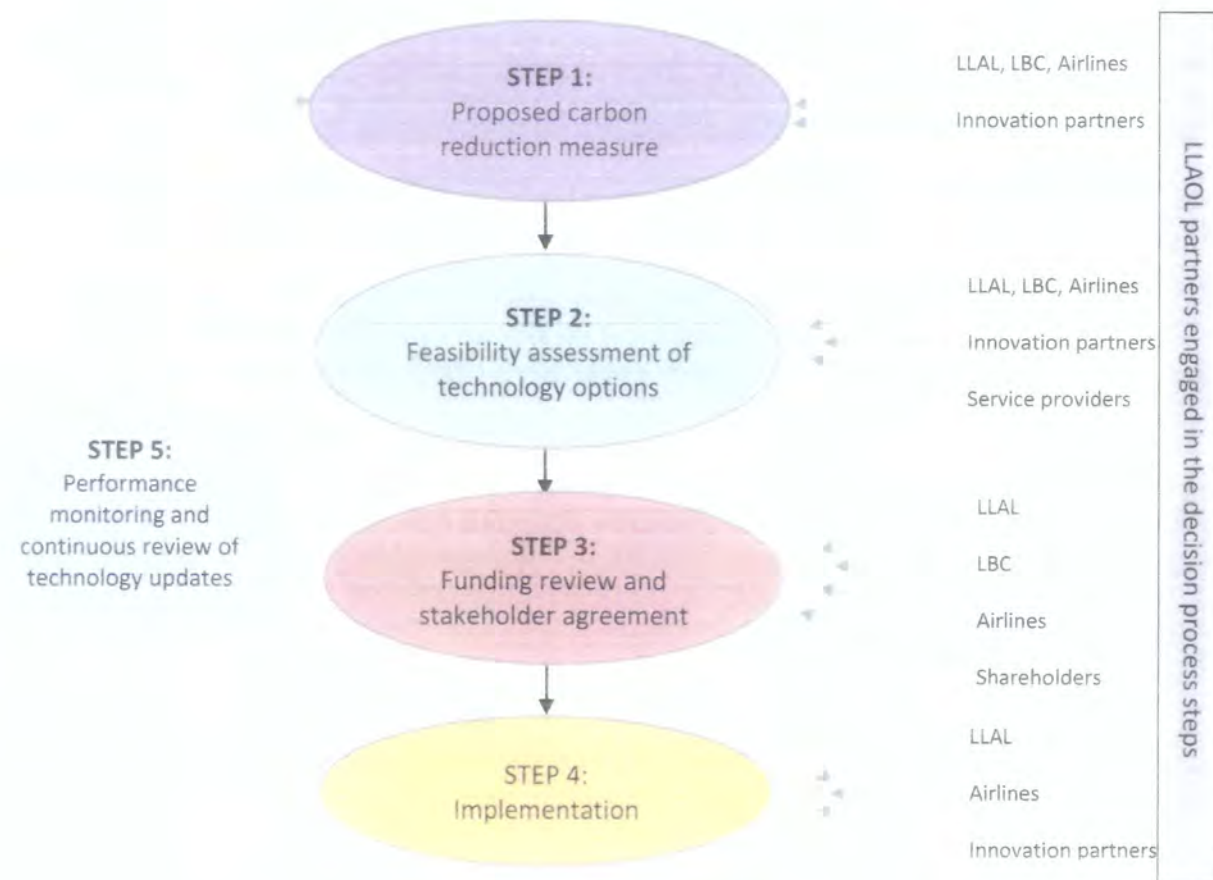


## 4 Outline Carbon Reduction Plan

The following sections summarise measures LLAOL will seek to implement under short and medium term timescales to enable London Luton Airport to become a net zero carbon airport, taking into account LBC's aim to be a carbon neutral borough by 2040<sup>1</sup>. For completeness, possible measures to be considered for the long term are also included, although this goes beyond the timeframe of LLAOL's current concession agreement. LLAOL recognises that it can also influence indirect sources of emissions associated with the airport, so the measures proposed include areas beyond LLAOL's commitment to achieve net zero carbon for its direct operational activities.

This outline CRP confirms LLAOL's direction of travel for carbon reduction, which is provided as a precursor to a detailed Carbon Reduction Plan that would include defined commitments. The measures proposed are based on a collaborative approach that takes into account LLAL and LBC's aspirations and roles in achieving net zero carbon for the airport. Figure 2 below provides a simplified outline of the process LLAOL would adopt to facilitate the implementation and review of carbon mitigation measures at LLA, particularly for those that require a joined-up approach from multiple stakeholders and significant logistical changes in a landscape of evolving options for decarbonisation technology.

Figure 2 Decision process summary for implementation of carbon mitigation technologies



In 2019 LLAOL committed to a series of measures to reduce Scope 1, 2 and 3 emissions in its Responsible Business Strategy (see box below), identifying LLAOL's existing targets to achieve carbon reduction, which have been incorporated into the outline CRP. This includes the overarching commitment to achieve the UK net zero target for 2050, with the aim to achieve this sooner. The remainder of the outline CRP section identifies additional proposals that LLAOL will seek to implement in collaboration with its partners at the airport, which go beyond those included in its RBS.

#### LLAOL Responsible Business Strategy – Carbon Mitigation Targets

- Achieve UK net zero target for 2050 and review the net zero target annually with the aim to achieve this sooner than 2050;
- Establish a plan for low-carbon airside and landside vehicles by mid-2021 (including potential savings for a full fleet of electric vehicles using renewable electricity);
- Source 100% of purchased electricity from renewable sources by end of 2021;
- Reduce operational electricity demand (excluding vehicles) to less than 2.0 kWh/pax by end of 2023;
- Reduce single occupancy vehicle travel to the airport (employees: 2022 = 64%);
- Greater than 28% of employees travelling to and from the airport using sustainable modes of transport by 2022;
- Promote and monitor sustainable travel for staff at the airport, including promoting cycling schemes, discounted travelcards for public transport and car sharing;
- Secure 12% participation in the staff travel survey by 2020 and increase the number of organisations attending the airport travel forum (12 by 2022);
- Reduce single occupancy vehicle travel to the airport (customers: 2022 = 47%);
- Greater than 36% of customers travelling to and from the airport using sustainable modes of transport by 2022;
- Assess if slightly steeper approaches can be adopted and implement recommendations by 2023;
- Airport Carbon Accreditation (ACA) scheme – achieve 'Reduction' level by 2022 (carbon management towards a reduced carbon footprint); and
- Supply at least 25% of energy used by the airport (or by LLAOL) from on-site renewables by end of 2026.



## 4.1 Short Term: 2020 to 2025

The short term measures incorporate several actions identified in LLAOL's RBS, including sourcing all of the airport's electricity from renewable sources and targets to reduce emissions from staff and passenger access to the airport. The short term measures from the RBS are clearly defined in terms of targets and timescales for mitigation, with significant progress being made in implementing measures to reduce LLAOL's emissions from its direct operational activities.

A summary of the key proposals for carbon reduction LLAOL would seek to implement in the short term up to 2025, both by itself and through collaboration with other stakeholders, are provided below. A full list of mitigation measures LLAOL is considering for the short term (in addition to those stated in its RBS), are presented in Table 4.1, which includes identification of key stakeholders that would be needed to support the initiatives. These include:

- Purchase electricity from 100% renewable sources and review options with LLAL and LBC for increasing on-site renewable energy generation, and opportunities for linking to local off-site renewable generation;
- Setting a 5-year carbon reduction target and strategy, which will be reviewed annually and incorporated into LLAOL's strategic business plans;
- Achieve Airport Carbon Accreditation Level 3 'Optimisation' through engagement with third parties in carbon footprint management;
- Continue with the programme of introducing energy efficient equipment and behaviours to reduce energy consumption and GHG emissions;
- Review of energy data and Building Management Systems (BMS) to inform carbon management strategies and identify opportunities for energy savings;
- Promote the use of sustainable travel for passengers and staff using the airport, with targets for reducing the use of single occupancy vehicle travel and increased use of sustainable transport, including the Luton DART;
- Establish a programme for the phased electrification of airside vehicles;
- Work with LLAL to conduct feasibility assessments and review of funding models for the provision of electrical vehicle charging infrastructure, based on expected demand and charging patterns (noting the UK Government's policy to phase out the sale of new petrol and diesel cars in the UK by 2030<sup>14</sup>);
- In conjunction with LLAL and airlines, create a working group with academia and innovators to seek solutions for sustainable aviation and the decarbonisation of energy use for the airport (noting the inclusion of international aviation emissions in legislation being introduced for the UK Government 6<sup>th</sup> Carbon Budget<sup>2</sup>); and
- Work with airlines to promote and incentivise low-carbon techniques during landing and take-off operations, including single-engine taxiing and continuous decent approach.

<sup>14</sup> UK Government (2020). <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>



Table 4.1 Short Term (2020-2025): Mitigation measures additional to RBS targets for achieving net zero carbon by 2050 within the timeframe of LLAOL's Responsible Business Strategy

Source	GHG Scope	Mitigation Area	Description
Airport buildings & ground operations	1 & 2	Operational vehicles	Establish a programme for the phased electrification of airside vehicles. All new contracts with Ground Handling Agencies to require electric vehicles, if possible
Airport buildings & ground operations	1 & 2	Renewables / Low Carbon Technologies	Conduct feasibility studies and funding review with LLAL and LBC for on-site and near-site renewable or low carbon energy generation, e.g. from solar, biomass, CHP etc, including consideration of any existing feasibility studies carried out by airport partners
Airport buildings & ground operations	1 & 2	Energy efficiency and reduction	Continue programme of upgrades to more energy efficient equipment and systems (e.g. air-handling equipment), supported by detailed survey of buildings and energy data to identify potential for energy savings and improved Building Management System controls.
Surface Access	3	Surface Access Staff & Passengers	Work with the council to improve pedestrian and cyclist access routes, and cycle facilities at the airport (noting that policies are under consultation by LBC on the 'Transport Strategy and Local Transport Policies' <sup>15</sup> )
Surface Access	3	Surface Access Staff & Passengers	Review strategies for car-parking allocation, consider preferential parking for electric or hybrid vehicles and penalty charges for high emissions vehicles
Surface Access	3	Electric vehicle charging	Noting timescales to phase out the sale of new petrol and diesel cars in the UK by 2030, instigate feasibility studies and funding review to ensure the smart provision of electrical vehicle charging infrastructure, based on expected demand and charging patterns.
Aviation	3	Aviation Operations	In collaboration with LLAL and airlines conduct feasibility assessment and funding review for installing Fixed Electric Ground Power (FEGP) and air-conditioning supplies at aircraft stands
Aviation	3	Aviation operations	Update airlines' "Conditions of use" policy to encourage low-carbon techniques during landing and take-off operations e.g. single/reduced-engine taxiing, advised take-off speeds
Aviation	3	Aviation operations	Incentivise implementation of more efficient aircraft through contractual agreements
Aviation	3	Sustainable Aviation	Work with airlines, LLAL and an innovation working group, to plan for operational measures that will support airlines to implement policies from the Sustainable Aviation Decarbonisation Road Map <sup>9</sup> for fuel-efficient aircraft, efficient operations and use of sustainable aviation fuels (noting also the inclusion of international aviation emissions in legislation being introduced for the UK's 6 <sup>th</sup> Carbon Budget <sup>2</sup> )
All sources	1,2 & 3	Measuring, Monitoring & Reporting	Develop a Carbon Reduction Strategy with a 5 year emission reduction target, incorporated into LLAOL's strategic business plans, and reviewed on an annual basis regarding progress and any material changes in local or national policies
All sources	1, 2 & 3	Measuring, Monitoring & Reporting	ACA scheme – achieve 'Optimisation' level 3 (engagement with third parties in carbon footprint management)
			LLAOL responsible for implementation of measure
			LLAOL working with LLAL on implementation of the measure
			LLAOL working with LLAL and LBC on implementation of the measure
			LLAOL liaising with airlines (and where indicated LLAL) on implementation of the measure

<sup>15</sup> Luton Borough Council (2020). Transport Strategy and Local Transport Policies (Draft for consultation). Available at: [https://engage.luton.gov.uk/planning-transport-parking-highways/copy-of-luton-transport-plan-consultation/user\\_uploads/luton\\_transport-strategy-and-policies.pdf](https://engage.luton.gov.uk/planning-transport-parking-highways/copy-of-luton-transport-plan-consultation/user_uploads/luton_transport-strategy-and-policies.pdf)



## 4.2 Medium Term: 2026 to 2031

By 2026 the majority of the carbon mitigation measures proposed in LLAOL's Responsible Business Strategy will have been implemented, although several of these may continue as ongoing strategies or require revised targets in the medium and long term. This period marks the end of LLAOL's current Concession Agreement for management of operations at London Luton Airport, which may require further consideration of inputs required from other stakeholders for the airport. There is also uncertainty regarding the level of preparatory work that would be required during this period for the potential expansion of the airport to 32 mppa under LLAL's expansion proposals. This is considered in part in the medium term measures, but would require further assessment to determine requirements for mitigation of carbon emissions from not only LLAOL's operational sources, but also those associated with surface access, aviation and the construction process.

A summary of some of the key carbon mitigation measures LLAOL will seek to implement in the medium term are provided below. A full list of the measures LLAOL plans to implement by 2031 are presented in Table 4.2, which again identifies key stakeholders for collaboration on the initiatives. Some of the headline measures include:

- Work with LLAL to increase the generation of electricity from on-site renewables to 50% by 2030, used to supply LLA operational requirements;
- Facilitate options for low carbon technology, including alternatives to gas for heating requirements and review developments in the application of hydrogen-based energy infrastructure.
- In partnership with LLAL and LBC facilitate the provision of 40 to 60 electric vehicle charging points to decarbonise energy supplies, ensuring the strategic location of infrastructure to match the progressive demand for electric vehicle capacity.
- Update surface access strategy and targets for staff and passengers using sustainable modes of transport for travel to and from the airport;
- Review scope to reduce embodied and operational carbon in development projects;
- Work with airlines, LLAL and the innovation working group to help facilitate the uptake of low-carbon flights, including infrastructure requirements for energy and fuel supplies, focusing on sustainable aviation fuels for international flights and LLA domestic aviation and short haul flights as the likely forerunners for development of hybrid-electric flights; and
- Achieve carbon neutrality for LLA's direct emissions by 2026, through offsetting residual carbon emissions and progressing to ACA Level 3+ 'Neutrality' (the fourth ACA Accreditation level).



Table 4.2 Medium Term (2026-2031): Mitigation measures additional to RBS targets for achieving net zero carbon by 2050 within the current Concession Agreement timeframe

Source	GHG Scope	Mitigation Area	Description
Airport buildings & ground operations	1 & 2	Renewables / Low Carbon Technologies	Work with LLAL to increase the proportion of on-site renewables used to supply the airport's operational electricity requirements, beyond the existing RBS target of 25% by 2026, to 50% of electricity generated by on-site renewables by 2030.
Airport buildings & ground operations	1 & 2	Energy efficiency and reduction	Facilitate options for replacing diesel generators with battery backup supplies or cleaner technology; alternatives to gas for heating requirements (e.g. air/ground source heat pumps, on-site biomass boiler, connecting to a district heating system); and review developments in the application of hydrogen-based energy infrastructure.
Airport buildings & ground operations / Surface Access	1, 2 & 3	Development projects	Collaborate with LLAL on its expansion proposals in facilitating the development of low carbon or nearly zero net energy buildings
Surface Access	3	Surface Access Staff & Passengers	Update surface access strategy and targets for staff and passengers using sustainable modes of transport to travel to and from the airport
Surface Access	3	Surface Access Staff & Passengers	Review renewals of contracts with bus operators and taxi operators to specify or incentivise the use of electric vehicles
Surface Access	3	Surface access	Incentivise suppliers to promote delivery consolidation and maximise the proportion of full-load trips and use of low carbon vehicles
Surface Access	3	Electric vehicle charging	In partnership with LLAL and LBC provide the infrastructure for 40 to 60 electric vehicle (EV) charging points by 2030, considerate of EV charging requirements, in line with the planned phase out of new petrol and diesel cars in the UK by 2030.
Aviation	3	Aviation Operations	Facilitate installation of Fixed Electric Ground Power (FEGP) on all new stands as part of LLAL's future development of the airport
Aviation	3	Aviation operations	In partnership with LLAL facilitate infrastructure and airline requirements for the introduction of electric flights, focussing on LLA domestic and short haul flights
Aviation	3	Aviation operations	As part of airspace modernisation, review the uptake of low-carbon techniques during landing and take-off operations and opportunities for further improvement
Aviation	3	Sustainable Aviation	In partnership with LLAL and innovation partners promote the uptake of sustainable aviation fuels and review logistical requirements to facilitate storage and access at the airport, taking into account timescales for the development and demand for sustainable aviation technology
All sources	1, 2 & 3	Measuring, Monitoring & Reporting	Produce an updated 5-year Carbon Reduction Strategy and emissions reduction target, with regular monitoring of performance and progress updates
All sources	1, 2 & 3	Measuring, Monitoring & Reporting	ACA scheme – achieve the fourth level: 'Neutrality' (level 3+, achieve carbon neutrality by offsetting residual carbon emissions from airport direct emissions)
			LLAOL responsible for implementation of measure
			LLAOL working with LLAL on implementation of the measure
			LLAOL working with LLAL and LBC on implementation of the measure
			LLAOL liaising with airlines (and where indicated LLAL) on implementation of the measure



### 4.3 Long Term: 2032 to 2050

The carbon mitigation measures that will be implemented by LLAOL in the short and medium term will set LLA on a path to achieve net zero for Scope 1 and Scope 2 emissions by 2040. As stated previously, LLAOL is not in a position to commit to measures beyond the end of its current concession agreement in 2031, so the measures included here for the long term are indicative of the type of measures that may be considered in the period up to 2050. A summary of the main carbon mitigation measures suggested for the long term are provided below. A full list of the measures that may be considered for implementation in the period 2032 to 2050 are presented in Table 4.3 (noting that the decision on measures and stakeholder input in this period lies with LLAL rather LLAOL).

- Achieve net zero carbon for London Luton Airport's Scope 1 and 2 operational emissions by 2040, and achieve significant reductions associated with surface access and aviation emissions, within the airport's sphere of influence;
- Review the feasibility of investing in on-site renewable and low-carbon energy generation to reduce reliance on energy from grid supplies;
- Review of surface access strategy to support sustainable transport, including capacity requirements for public transport and low-carbon vehicle use;
- Implement infrastructure to meet demand for low carbon aircraft;
- Progress to the advanced levels of the ACA scheme, achieving Level 4 'Transformation' and Level 4+ 'Transition'; and
- Address any residual carbon emissions for the airport, using approved carbon removal schemes to achieve net zero carbon for the airport's emissions.

Table 4.3 Long Term (2032-2050): Indicative mitigation measures for achieving net zero carbon by the UK's target for 2050 (beyond LLAOL's Concession Agreement)

Source	GHG Scope	Mitigation Area	Description
Airport buildings & ground operations	1 & 2	Renewables / Low Carbon Technologies	Continually review the feasibility of investing in on-site renewable and low-carbon energy generation to reduce reliance on energy from grid supplies
Airport buildings & ground operations	1 & 2	Operational vehicles	Provide sufficient electric vehicle charging points for airside and landside operational vehicles to be electric or plug-in hybrid
Surface Access	3	Surface Access – Staff and Passengers	Continued review of surface access strategy, including any capacity constraints for the DART and other public transport options Update targets for staff and passengers using sustainable modes of transport to travel to and from the airport.
Surface Access	3	Electric vehicle charging	Continued review of capacity requirements for the provision of electrical vehicle charging infrastructure
Surface Access	3	Residual Emissions	Offset residual carbon emissions from staff and passenger journeys to and from the airport
Aviation	3	Aviation operations	Implement infrastructure to meet demand for low carbon aircraft e.g. sustainable fuel provision, electrical charging
Aviation	3	Aviation operations	Review the demand and facilitate provision for pre-conditioned air for aircraft stands
All sources	1, 2 & 3	Measuring, Monitoring & Reporting	Produce 5-yearly Carbon Reduction Strategies and emissions reduction targets, with regular monitoring of performance and progress updates
All sources	1, 2 & 3	Measuring, Monitoring & Reporting	ACA scheme – progress to advanced levels of accreditation: <ul style="list-style-type: none"> <li>- Fifth ACA stage, 'Level 4 Transformation': set a policy commitment to achieve absolute emissions reductions, strengthen stakeholder engagement, and further coverage of Scope 3 emissions in carbon footprint reporting</li> <li>- Sixth (and final) ACA stage, 'Level 4+ Transition': compensation for residual Scope 1 and 2 emissions (if required), as well as emissions for staff business travel, using internationally recognised offsets</li> </ul>



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