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London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

8.131 Written Question Responses - Applicant's Response to Luton Borough Council's Comments

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.131

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.131 Written Question Responses -
Applicant's Response to Luton Borough Council's Comments**

Deadline:	Deadline 6
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1 INTRODUCTION

1.1 Purpose

- 1.1.1 This document provides the Applicant's response at Deadline 6 to the comments made by Luton Borough Council on the answers provided by the Applicant in response to the Examining Authority's (ExA) first set of Written Questions.
- 1.1.2 Questions directed to parties other than the Applicant have not been addressed, neither have responses provided by other parties – unless the Applicant initially provided a comment which was considered relevant to the question being asked.
- 1.1.3 Where the Applicant disputes comments made by the Interested Party, this document will provide an explanatory rebuttal as to why there is a difference of opinion. The Applicant has responded only to parts of the submissions made by the Interested Party which it considers warrants a response. If a new issue has not been raised, then a further response has not been provided, however this does not represent acceptance or agreement by the Applicant of the point raised.

1.2 Structure

- 1.2.1 Table 1.1 sets out the Written Questions initially issued by the ExA and the Applicant's answer, along with the comments made by Luton Borough Council at Deadline 5 and the Applicant's response to this at Deadline 6.

Table 1.1: Applicant's response to comments on Written Question responses

PINS ID	Subject	Luton Borough Council Response at D5	Luton Rising Response at D6
REP4-057 – Applicant's Response to Written Questions – Draft Development Consent Order (dDCO)			
DCO.1.6	Article 35 – special category land	<p>LBC is aware that the Hertfordshire Authorities outlined in their joint Local Impact Report [REP1A-003] some concerns with the drafting of article 35 ('special category land') particularly around the mechanism for securing the timely replacement of open space that would be lost to the Applicant's scheme should development consent be granted in the terms sought. In relation to the drafting, while it is acknowledged that a form of this article has appeared in numerous DCOs it is understood that the Hertfordshire Authorities are concerned that the trigger for article 35(1) is a combination of the vesting of the land and the certification of the 'receipt' by the relevant planning authority of the scheme for the provision of the replacement land. The Hertfordshire Authorities point out that the drafting makes no provision for the relevant planning authority to exercise a judgement as to the adequacy of such a scheme, however, it is worth noting that the layout of the proposed replacement open space has been long agreed with the relevant landscape officers of LBC and North Hertfordshire District Council, and LBC anticipates that there will be a requirement for the land to be laid out to the satisfaction of the local planning authority in accordance with the agreed plans.</p> <p>A further issue that the Hertfordshire Authorities raise relates to the timing of the implementation of the scheme for the provision of replacement land and the release of the special category land from the rights and interests to which it is subject. In discussions with the Host Authorities, the Applicant has always been clear that development in the existing Wigmore Valley Park cannot begin until the replacement land has been opened for use by the people who would have had use of the land taken. Whilst the Hertfordshire Authorities have concerns that there could be an indeterminate period between the existing special category land being taken out of use and the replacement open space being available for the public, this is a matter that has been raised in discussions and the Applicant has indicated that there is no risk of there being a lag, and every likelihood that there will be an overlap of time where both areas are available for use. Broader issues, such as the fact that article 35 does not deal with the long term maintenance/ management of the open space, are being discussed between the Host Authorities and the Applicant. LBC anticipates that matters relating to the management by the proposed Community Trust, and the associated funding, will be addressed through the on-going s106 agreement discussions.</p>	<p>The Applicant notes the Hertfordshire Host Authorities' position but does not agree with the concerns raised. In particular, the Applicant notes that Article 35 is to be read alongside other commitments contained in the DCO and in other "control" documents which are secured by the draft DCO. These are:</p> <ul style="list-style-type: none"> • Requirement 5, which requires the detailed design of the park to be approved by the relevant local planning authorities. The design must accord with the Design Principles [REP5-034] which include specific design principles for Wigmore Valley Park at page 11. Furthermore, the design must not give rise to materially new or different effects compared to those reported in the Environment Statement. Requirement 5 requires provision of a timetable for undertaking the works, along with notification of commencement and completion of the park works. Lastly, the relevant local planning authority can request further information about the park works before making its decision on the application to discharge the requirement. • Environmental Statement Appendix 4.2, Code of Construction Practice [REP4-011], which at paragraph 12.1.1e commits the Applicant to, "maintaining access and not commencing construction works in the existing Wigmore Valley Park until the replacement open space is accessible to the public". Compliance with the Code of Construction Practice is secured through requirement 7 of the draft DCO. • Strategic Landscape Masterplan [APP-172], which sets out various commitments in relation to Wigmore Valley Park, specifically on page 9. Compliance with the Strategic Landscape Masterplan is secured through requirement 8 of the draft DCO. • Environmental Statement Appendix 8.2, Landscape and Biodiversity Management Plan [AS-029], specifically at paragraph 3.2.2. Compliance with this document is secured through requirement 9 of the draft DCO. <p>The combined operation of these provisions, alongside article 35, will serve to ensure that the replacement scheme is approved by the local authority as meeting the multitude of commitments contained in the DCO application, and with a clear timetable for its coming into operation. The Examining Authority can be confident that the concerns expressed by the Hertfordshire Host Authorities have already been comprehensively addressed.</p> <p>In relation to the final point raised, the Applicant confirms that the long term maintenance of the replacement land will be secured through an obligation in the s106 agreement. The ExA has requested an update on how the replacement land will be managed by Deadline 7 and discussions between the Applicant and the Host Authorities are ongoing.</p>
DCO.1.13	Requirement 10 – landscape and biodiversity management plan	The Host Authorities welcome the additions to paragraphs 34 and 35 of Schedule 2 to the draft DCO. Further comments are provided in Section 2 of the accompanying LBC document 'Responses to Any Further Information at Deadline 4'.	The Applicant notes LBC's response and confirms that it has responded to LBC's point at Deadline 5, Applicant's Comments on Responses to Written Questions by Interested Parties [REP5-052] .

PINS ID	Subject	Luton Borough Council Response at D5	Luton Rising Response at D6																														
DCO.1.20	Phasing	The Host Authorities provided their answer to this question at Deadline 4. The Host Authorities welcome the Applicant's additions to requirements 5 and 35. Further comments are provided in Section 2 of the accompanying LBC document 'Responses to Any Further Information at Deadline 4'.	The Applicant notes LBC's response and confirms that it has responded to LBC's point at Deadline 5, Applicant's Comments on Responses to Written Questions by Interested Parties [REP5-052] .																														
DCO.1.23	Operational ground noise	The Host Authorities' comments on this document are set out in Sections 2, 5 and 6 of the accompanying LBC document 'Responses to Any Further Information at Deadline 4'.	Noted. The Applicant has responded at Deadline 6 in the Applicant's Response to Deadline 5 Submissions [TR020001/APP/8.127] .																														
REP4-058* – Applicant's Response to Written Questions – Green Controlled Growth (GCG) *Note that this has been superseded by REP5-090.																																	
GCG.1.1	GCG – ESG/GCG process	It would appear most sensible for the ESG and Technical Panels to be set up as soon as is reasonably practicable, as is mooted by the Applicant. The Host Authorities support every effort being made to have these forums in place at the earliest opportunity, or at least efforts made to contact likely required parties to make them aware of possible commitments and / or for the Applicant / Airport Operator to have received fee proposals from likely relevant parties.	Noted. The Applicant has made changes at Deadline 5 to the drafting of the Development Consent Order [REP5-003] . Requirement 19 now states that the undertaker must establish the ESG as soon as reasonably practicable following service of the notice under article 44(1). Considering that all functions of the ESG are triggered by the submission of the first Monitoring Report by the airport operator, the Applicant believes that this provides an appropriate amount of time for the establishment of the body.																														
GCG.1.2	GCG – Fixed noise monitoring	<p>The Applicant states in its response to this question that the principal criteria are to meet the minimum standards as set out in CAP2091. The modelling requirements of CAP2091 are based on total population counts around an airport within certain day and night contours, except for designated airports which have stricter requirements. Luton Airport currently falls into Category C and would need an increase of over 100,000 people into the LOAEL before even being above the recommended minimum threshold for Category B, as can be seen in Table 4.1 below, taken from CAP2091. The same magnitude of increase would be true for the night-time as well. It is only within Category B and above that noise monitoring is strictly required. The commitment to review and, if necessary, improve the noise monitoring stations by the Applicant therefore appears to be immaterial.</p> <p>Table 4.1: Thresholds for noise modelling Categories, average summer day, population exposed to 51 dB LAeq,16h or above.</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Lower threshold</th> <th>Recommended minimum threshold</th> <th>Mandated minimum threshold</th> <th>Maximum threshold</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>0</td> <td>400,000</td> <td>500,000</td> <td>none</td> </tr> <tr> <td>B</td> <td>0</td> <td>160,000</td> <td>200,000</td> <td>500,000</td> </tr> <tr> <td>C</td> <td>0</td> <td>20,000</td> <td>25,000</td> <td>200,000</td> </tr> <tr> <td>D</td> <td>0</td> <td>1,600</td> <td>2,000</td> <td>25,000</td> </tr> <tr> <td>E</td> <td>0</td> <td>0</td> <td>0</td> <td>2,000</td> </tr> </tbody> </table>	Category	Lower threshold	Recommended minimum threshold	Mandated minimum threshold	Maximum threshold	A	0	400,000	500,000	none	B	0	160,000	200,000	500,000	C	0	20,000	25,000	200,000	D	0	1,600	2,000	25,000	E	0	0	0	2,000	<p>In the context of reviewing and, if necessary improving, the airport noise monitoring terminals it is not agreed that it is immaterial that the airport operator's fixed noise monitoring terminals are fully compliant with Civil Aviation Authority (CAA) guidance on noise monitoring and noise model validation (Ref 1). Whilst it is noted that the principal criteria for new noise monitoring terminals would be related to Civil Aviation Authority (CAA) guidance, it was also noted that review and updates to the monitoring terminals could be made as a result of an airspace change, as part of ongoing review by the Noise and Track subcommittee, and/or as part of updates to Noise Action Plans.</p> <p>Further, as noted in the WQ response, paragraph C4.2.3 of the Aircraft Noise Monitoring Plan [REP5-028] commits to additional noise monitoring terminals over and above those required to comply with CAA guidance.</p> <p>Following further discussion with the Host Authorities' noise consultant, the Applicant has clarified the position to the Host Authorities and the Host Authorities' noise consultant has subsequently noted that "<i>The current proposals to maintain the three existing positions and add further positions once airspace changes are known are acceptable</i>" (see the Applicant's Deadline 6 submission, Applicant's Response to Suono's Note on Noise Controls [TR020001/APP/8.126]).</p>
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GCG.1.3	GCG – controls on early/ late flights	Noise Early / late running flights are not dispensable under the Government's dispensation guidelines. This is clearly stated within the consultation outcome of the Night Flight Restrictions (link below), updated on 27 March 2023, and in	The Applicant does not suggest that early or late running flights would be subject to dispensations other than those covered by the stated dispensations which, for London Luton Airport, are derived from those for the designated airports. The 5% allowance for delayed flights is used to ensure that the future																														

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		<p>any event only apply to the movement limits and Quota Counts (QC) of the three designated airports. Luton Airport is not designated, nor is the Applicant proposing either of the relevant controls. Dispensation of early and late running flights is therefore clearly not an option available to the Applicant. The same consultation response also states in its 'Summary of Findings' section, "There was a trend observed at all 3 airports of dispensations being applied for airspace capacity related delays which did not have an underpinning causation that clearly met the government's dispensation criteria. The government wrote to each designated airport in 2018 to state that airspace capacity related delays, without an underlying cause that is exceptional and falls within a specified circumstance, are not dispensable. In response, airports and airlines have taken steps to reduce the risk of unscheduled capacity related night movements occurring, and therefore reversing this trend." [our emphasis]. Rather than the Applicant simply stating that late running flights are difficult to control, efforts should be made to investigate how Heathrow, Gatwick and Stansted have been reducing early and late running movements and seek to implement positive change. https://www.gov.uk/government/consultations/night-flightrestrictions-at-heathrow-gatwick-and-stansted-airportsbetween-2022-and-2024-plus-future-night-flightpolicy/night-flight-restrictions#revising-our-night-flightdispensation-guidance-1</p>	<p>noise contours reflect, as far as possible, the expected number of flights delayed into the night period. It is not suggested that these would be subject to dispensation and will form part of the assessed noise or any use of QC budgets.</p> <p>In terms of the reduction cited in the Government's consultation in relation to the Night Flying at the Designated Airports (Heathrow, Gatwick and Stansted) (Ref 2), the outcome suggests that the reduction achieved relates to airlines seeking "dispensations being applied for airspace capacity-related delays". This is distinct from the question as to the extent to which an airport can control the extent of delays due to broader airspace-capacity related delays arising from issues outside of its control or, indeed, outside of the UK altogether.</p>
GCG.1.7	Noise Action Plan	The Host Authorities await the Applicant's Deadline 5 submission with details of proposed updated monitoring and reporting requirements, and will scrutinise these once provided by the Applicant	Noted. The Host Authorities' noise consultant has subsequently stated with regard to monitoring requirements that "The current proposals to maintain the three existing positions and add further positions once airspace changes are known are acceptable" and with regards to reporting requirements: "The proposal is acceptable, as it would carry across the current reporting requirements." (see the Applicant's Deadline 6 submission, Applicant's Response to Suono's Note on Noise Controls [TR020001/APP/8.126]).
GCG.1.12	GCG Appendix A – ESG threshold	The Host Authorities provided their answer to this question at Deadline 4 and the Applicant's response is noted and further discussion awaited with regard to the threshold for the ESG to be quorate.	The Applicant considers that the matter raised regarding the threshold for ESG being quorate has been addressed on Page 8 of the Applicant's Response to Deadline 4 Submissions Appendix B - Dacorum Borough Council, Hertfordshire County Council & North Hertfordshire Council (Response to D3 Documents) [REP5-048] submitted at Deadline 5.
GCG.1.13	GCG Appendix B – technical panel threshold	The Host Authorities provided their answer to this question at Deadline 4 and the Applicant's response is noted and further discussion awaited with regard to the threshold for the Technical Panels to be quorate.	The Applicant considers that the matter raised regarding the threshold for ESG being quorate has been addressed on Page 8 of the Applicant's Response to Deadline 4 Submissions Appendix B - Dacorum Borough Council, Hertfordshire County Council & North Hertfordshire Council (Response to D3 Documents) [REP5-048] submitted at Deadline 5.
REP4-059 – Applicant's Response to Written Questions – Need Case			
NE.1.4	Airport capacity in the South East	The Applicant's response states that increases in passenger load factor account for a substantial proportion of the growth in passengers per movement at Heathrow and Gatwick. Analysis of CAA Airline Statistics for 2009 and 2019 indicates that for UK aircraft operators, just under half of the growth in this key parameter resulted from higher seat load factors (increasing by 9.0% over the period from 75.5% to 82.3%) and just over half came from increases in the average number of seats per flight (increasing by 9.8% from 145.8 to 160.1). UK registered airlines carry about half of the passengers at UK airports. While the increase in passenger load factors cannot continue	As set out in the response to WQ NE.1.4, the Applicant considers that the scope for further increases in aircraft size, over and above the question of the scope for further growth in load factors, is likely to be similar at all of the main London airports. This reflects the trends in short haul aircraft capacity and the expected replacement of some larger long haul types, such as the A380 with 379-615 seats, by smaller types such as the B777-9 with 400-425 seats. Hence, the Applicant believes that the only way in which the number of passengers per aircraft could be increased at Heathrow and Gatwick would

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		indefinitely, a similar limit on average seats per flight is much further away. Gatwick Airport is clearly of the view that there is considerable scope to further increase its average passengers per movement as set out in the Host Authorities ISH2 posthearing submission at Deadline 3 [REP3-093]. It should be noted that the ExA question refers to an Air Traffic Movement (ATM) cap at Gatwick of 283,000 movements – there is no ATM cap, and the CAA records show that prior to the pandemic Gatwick was operating with more movements than the figure that the ExA reference (2017 – 285,912 ATMs, 2018 – 283,919 ATMs and 2019 – 284,987 ATMs).	be through a switch from short haul to long haul, resulting in greater displacement of short haul flights to airports such as London Luton.
NE.1.11	Impacts on forecasting assumptions	The Host Authorities provided their answer to this question at Deadline 4 and have no further comments on the Applicant's response.	The Applicant notes the host authorities' views on forecasting uncertainties and considers that these are already addressed in the range of forecasts presented between the Slower and Faster Growth Cases set out in Section 6 of the Need Case [AS-125].
REP4-060 – Applicant's Response to Written Questions – Noise			
NO.1.8	2013 baseline comparison	<p>The Applicant has not answered the question, which clearly asks how the Proposed Development meets the policy requirement of ensuring the impact of aircraft noise is limited and, where possible, reduced compared to a historic baseline. The Applicant instead draws reference to the OANPS and does not acknowledge that this is not the only aviation noise policy in effect, as it does not annul or supersede Aviation Policy Framework 2013 (APF), UK Airspace Policy 2017 consultation (UKAP) nor the Airport National Policy Statement 2018 (ANPS). The Applicant sets out in their response that there is a reduction offered in the daytime, but no reduction in the night-time. While the ANPS does reference the reduction applying to the 54 dB LAeq,16hour contour (daytime), ANPS is also clear that a 6.5-hour nighttime flight ban is also expected (section 5.62, ANPS). The Applicant is not proposing a comparable nighttime mitigation measure, and therefore it is important that noise reduction in the night-time is also considered. As recognised in APF in section 3.34, noise from night flights has a higher cost on local communities.</p> <p>The policy requirement of APF to <i>"limit and where possible reduce the number of people in the UK significantly affected by aircraft noise"</i> is also still in effect, from which the wording of the ANPS follows. As can be seen in the table provided within the Applicant's response, where policy requires that <i>"The noise mitigation measures should ensure the impact of aircraft noise is limited and, where possible, reduced compared to the 2013 baseline assessed by the Airports Commission"</i> cannot be considered to be met, due to the night-time increases (when using an appropriate historic baseline, rather than necessarily the 2013 baseline). The Host Authorities wish to emphasise that the 2019 actual baseline used by the Applicant is not considered appropriate as it reflects a level of operations that breached an extant noise condition.</p>	<p>The Applicant has answered the question in [REP4-060], including how the Proposed Development meets the policy requirement of ensuring the impact of aircraft noise is limited and, where possible, reduced compared to a historic baseline.</p> <p>It is not the case that Applicant only refers to the Overarching Aviation Noise Policy Statement (OANPS, Ref 3) and does not acknowledge the Aviation Policy Framework (APF, Ref 4), 2017 UK Airspace Policy Consultation (Ref 5) or the Airports National Policy Statement (ANPS, Ref 6). The APF is mentioned in the first sentence of the response. The 2017 UK Airspace Policy Consultation and its relevance to the aviation noise objective is described in Commentary on the Overarching Aviation Noise Policy Statement [REP1-012] which is mentioned in the second sentence of the response. The ANPS is dealt with in the third paragraph of the response and onwards.</p> <p>The response specifically addresses night-time noise increases in the final paragraph, noting that it remains policy compliant. The Applicant has commented on this policy compliance when using the 2019 Actuals baseline, the 2019 Consented baseline, the 2013 Actuals baseline and the 2016 Actuals baseline (the last two as specifically requested by the ExA).</p> <p>The Applicant's position on the use of the 2019 actuals baseline is set out in Applicant's Post Hearing Submission - Issue Specific Hearing 3 (ISH3) [REP3-050].</p>
NO.1.9	2019 actuals baseline	The Applicant states that the 2016 baseline is similar to the 2019 consented baseline, which is not disputed, nor surprising. The step that the Applicant does not take is to compare the 2016 baseline to the 2019 actuals, which would show a smaller reduction in noise levels over time in the daytime, and no noise reduction over time at night-time, as per NO.1.8.	<p>The 2016 baseline is compared to the 2019 actuals in response to WQ NO.1.8.</p> <p>The Applicant's position on the use of the 2019 actuals baseline is set out in Applicant's Post Hearing Submission - Issue Specific Hearing 3 (ISH3) [REP3-050].</p>

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		While the assessment of significant effects would largely remain unchanged, claims of noise reduction as set out in Chapter 16 would be different and as stated in NO.1.8, not be considered compliant with aviation noise policy.	
NO.1.13	Future fleetmix assumptions – next generation	<p>The Applicant's assumption that aircraft noise levels are no quieter in the future does not bring about sufficient constraint in the future, should new aircraft actually be quieter than existing.</p> <p>Should quieter aircraft enter the market, there may not be sufficient incentivisation for airlines to operate these aircraft from Luton, as there is no reduction in the size of the noise contour limit in future years. In this situation, there could therefore be noise benefits that are not being shared with the local community, as the constraints placed on the Airport are insufficient. This response links in with those concerning GCG in Table 3 above.</p>	The Noise Limit Review (see paragraph 3.2.29 onwards of the Green Controlled Growth Explanatory Note [REP5-020]) requires that the Noise Limits are reviewed and if possible reduced should quieter aircraft become available. This would incentivise the transition of quieter aircraft, once entering the market, into the Luton airport fleet. The Noise Limit Review and any resulting reductions of noise limits must be reviewed by the Noise Technical Panel and approved by the Environmental Scrutiny Group (or ultimately the Secretary of State in the event of an appeal).
NO.1.22	Airline orders	<p>The first two sentences of the last paragraph (starting 'The Applicant believes' and ending 'through Green Controlled Growth') are ultimately the same argument that was made for the 2012 application (LBC ref: 12/01400/FUL), and that scenario resulted in noise breaches occurring.</p> <p>See response in accompanying LBC document 'Responses to Any Further Information at Deadline 4', in Section 7 addressing Issue Specific Hearing 1 Actions 20, 21, 24 and 26 and Issue Specific Hearing 3 Action 28: Green Controlled Growth - Transition Period and Slot Allocation Process [REP4-072].</p>	The Applicant considers that the point was addressed in the response to NO.1.22. Given the passage of time since 2012, there is far more certainty now as to the rate of introduction of new generation aircraft entering the airline fleets as such aircraft are already in operation, which was not the case in 2012. To the extent that there is any remaining uncertainty regarding the rate of fleet transition to new generation types, this will be addressed through the application of the GCG Framework to ensure that any noise breaches are addressed.
REP4-067 – Applicant's Response to Written Questions – Socio-economic Effects			
HAC.1.9	Assessment Receptors	<p>LBC provided its answer to this question at Deadline 4 [REP4-187], and since then has met with the Applicant on 13 November 2023 to discuss the issues of housing further.</p> <p>The Applicant presented details of the numbers of construction workers that would be associated with the various phases of development, noting that with 48% of the workforce assumed to be local, this would mean that during the busiest period of construction, Phase 2a in 2039, circa 700 construction workers would require housing, with the assumption being that these would be in rented accommodation or bed and breakfast. The concerns of LBC's housing team were noted, though it was recognised that due to the timespan of the project, circumstances could differ substantially in 15 years' time compared to now. LBC's housing team notes that the best mitigation against housing pressure during Phase 2a construction is a long term engagement between the Council, the Applicant and key employers to anticipate and plan for the housing demand and transport needs of those workers.</p>	<p>Noted. Discussed and agreed to close at meeting on 13 November 2023. An additional general provision has been added under section 12 Health and Community of the Code of Construction Practice (CoCP) (Appendix 4.2 of the ES [TR020001/APP/5.02]) which has been re-submitted at Deadline 6, and reads:</p> <p><i>"e. engagement with Luton Borough Council prior to the commencement of works associated with the new Terminal 2, to review the potential construction workforce numbers and local rental accommodation requirements;"</i></p> <p>The CoCP is secured by Requirement 7 of the draft DCO [REP5-003].</p>

REFERENCES

Ref 1 Civil Aviation Authority, (2021); CAP 2091: CAA Policy on Minimum Standards for Noise Modelling

Ref 2 Department for Transport (2023). Consultation outcome. Night flights restrictions at Heathrow, Gatwick and Stansted airports beyond 2024, plus national night flight policy

Ref 3 Department for Transport (2023), Policy Paper: Overarching Aviation Noise Policy

Ref 4 Her Majesty's Stationery Office (2013), The Aviation Policy Framework

Ref 5 Department for Transport (2017), Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace

Ref 6 Department for Transport (2018). Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England