

January 2024

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.149 Applicant's Response to Written Questions - Broad
and General, cross-topic questions**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.149

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.149 APPLICANT'S RESPONSE TO WRITTEN QUESTIONS -
BROAD, CROSS-TOPIC AND GENERAL QUESTIONS**

Deadline:	Deadline 7
Planning Inspectorate Scheme Reference:	TR020001
Document Reference:	TR020001/APP/8.149
Author:	Luton Rising

Version	Date	Status of Version
Issue 01	January 2024	Additional submission – Deadline 7

Contents

Page

1	Response to Examining Authority written questions (Broad, cross-topic and general questions)	1
----------	---	----------

1 RESPONSE TO EXAMINING AUTHORITY WRITTEN QUESTIONS (BROAD, CROSS-TOPIC AND GENERAL QUESTIONS)

Table 1.1: Responses to the Examining Authority's Written Questions (Broad, cross-topic and general questions)

PINS ID	Question / Response																																										
BCG.2.1	<p>Question:</p> <p>Written questions following Hearings At the Hearings [EV13-006], [EV14-008], [EV15-013] and [EV16-009] a number of questions were converted to written questions to be answered at deadline (D)7. Please provide responses to these questions alongside those requested under further written questions (ExQ2). If you are providing your responses to ExQ2 in a table, the Examining Authority (ExA) is happy for you to include the responses to the hearing questions at the end of the relevant section. For example, questions from EV-014 could be included at the end of the responses to the traffic and transport questions from ExQ2.</p> <p>Response:</p> <p>The Applicant has provided at Deadline 7 responses to written questions arising from the hearings [TR020001/APP/8.146].</p>																																										
BCG.2.2	<p>Question:</p> <p>Passenger numbers for 2023 If available, provide the passenger numbers for 2023. If they are not available for the full year, provide the latest available figure.</p> <p>Response:</p> <p>The Applicant confirms that PAX numbers provided for 2023 (excluding infants) are forecast to be 16.2m, based on actuals/forecast for December as set out in the Table below:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Month</th> <th>Passenger Numbers (excluding infants)</th> </tr> </thead> <tbody> <tr><td>January</td><td>976,632</td></tr> <tr><td>February</td><td>1,058,058</td></tr> <tr><td>March</td><td>1,231,139</td></tr> <tr><td>April</td><td>1,384,878</td></tr> <tr><td>May</td><td>1,515,490</td></tr> <tr><td>June</td><td>1,527,712</td></tr> <tr><td>July</td><td>1,620,882</td></tr> <tr><td>August</td><td>1,668,206</td></tr> <tr><td>September</td><td>1,509,479</td></tr> <tr><td>October</td><td>1,416,252</td></tr> <tr><td>November</td><td>1,070,687</td></tr> <tr><td>December (forecast)</td><td>1,228,562</td></tr> <tr><td>Total</td><td>16,207,977</td></tr> </tbody> </table> <p>It should be noted that these numbers are the latest forecast from LLAOL for 2023 and are currently being validated. The final figures are due to be published by the operator in January 2024. It should also be noted that the figures in the table above exclude infants and so do not match CAA published passenger numbers, as those include infants and form the basis of the data included in the Need Case [AS-125] and the demand forecasts. CAA equivalent data as published in Airport Statistics for the period between January to October 2023, are shown in the table below.</p> <table border="1" style="margin-left: 20px;"> <tbody> <tr><td>January</td><td>989,393</td></tr> <tr><td>February</td><td>1,069,833</td></tr> <tr><td>March</td><td>1,245,137</td></tr> <tr><td>April</td><td>1,402,365</td></tr> <tr><td>May</td><td>1,536,722</td></tr> <tr><td>June</td><td>1,549,590</td></tr> <tr><td>July</td><td>1,642,427</td></tr> </tbody> </table>	Month	Passenger Numbers (excluding infants)	January	976,632	February	1,058,058	March	1,231,139	April	1,384,878	May	1,515,490	June	1,527,712	July	1,620,882	August	1,668,206	September	1,509,479	October	1,416,252	November	1,070,687	December (forecast)	1,228,562	Total	16,207,977	January	989,393	February	1,069,833	March	1,245,137	April	1,402,365	May	1,536,722	June	1,549,590	July	1,642,427
Month	Passenger Numbers (excluding infants)																																										
January	976,632																																										
February	1,058,058																																										
March	1,231,139																																										
April	1,384,878																																										
May	1,515,490																																										
June	1,527,712																																										
July	1,620,882																																										
August	1,668,206																																										
September	1,509,479																																										
October	1,416,252																																										
November	1,070,687																																										
December (forecast)	1,228,562																																										
Total	16,207,977																																										
January	989,393																																										
February	1,069,833																																										
March	1,245,137																																										
April	1,402,365																																										
May	1,536,722																																										
June	1,549,590																																										
July	1,642,427																																										

PINS ID	Question / Response						
	<table border="1" data-bbox="543 296 902 401"> <tr> <td>August</td> <td>1,691,587</td> </tr> <tr> <td>September</td> <td>1,531,651</td> </tr> <tr> <td>October</td> <td>1,433,213</td> </tr> </table> <p>In broad terms, the expected outturn for the year in CAA equivalent figures is expected to be c.16.35 mppa.</p>	August	1,691,587	September	1,531,651	October	1,433,213
August	1,691,587						
September	1,531,651						
October	1,433,213						
BCG.2.3	<p>Question: For All Interested Parties</p> <p>Central Government policy and guidance Are you aware of any updates or changes to Government policy or guidance, including emerging policies, such as the National Planning Policy Framework (NPPF), that may come into force before the end of the reporting period that could be relevant to the determination of this application? If yes, what are the likely implications for the application?</p> <p>Response:</p> <p><u>NPPF</u></p> <p>The Applicant notes that this question is directed to All Interested Parties, however the Applicant considers that a response from the Applicant will help provide further clarification.</p> <p>An updated NPPF was published on 19 December 2023. The only updates of relevance to the Proposed Development are the new references to achievement of beautiful buildings and places (e.g. Paragraph 96 and 128e), and the associated changes to Paragraph 138 requiring LPAs to make use of tools and processes for assessing and improving the design of development, including through the preparation and use of local design codes. The Applicant considers that the revised Design Principles [TR020001/APP/7.09] and the commitment to a design review process are consistent and compliant with these updates to the NPPF.</p> <p><u>Slot Allocation</u></p> <p>On 4 December 2023, the Department for Transport issued a consultation on potential reforms to the slot allocation system. This consultation seeks views from the UK aviation industry on how to achieve more efficient use of slots through enabling greater mobility in terms of airlines holding slots and making the system of allocation more transparent. It does not propose any changes to the process or requirements for the declaration of airport capacity. The only material change in this regard that is being consulted on, is the suggestion that the chair of a Coordination Committee might be an independent appointment, i.e. independent of the airlines or the airport operator. The consultation period is due to end on 08 March 2024.</p> <p>The consultation is clear that there is no proposal to change the principle of airlines holding historic grandfather rights to already allocated slots so long as they use them. However, there is a proposal to change the ‘use it or lose it’ rule to require slots to be used for 90% of the time to retain historic rights. The proposals address the mechanisms for allocation of slots from the pool, i.e. those left within the capacity declaration after historic rights have been accounted for. The Government is clear that it needs to work with the industry globally to achieve changes, taking into account the <i>Worldwide Slot Guidelines</i>.</p> <p>The consultation proposals comprise:</p> <p><i>Existing slots</i></p> <ul style="list-style-type: none"> • A redefinition of the new entrant rule to allow greater scope for airlines with existing slots at an airport to avail of new entrant priority; • Restrictions on the ability of airlines to alter the route used for a newly allocated slot from the pool for a period of two years; • Removal of the current priority given to airlines seeking to retain existing slots ahead of the allocation of new slots from the pool; • Permanent powers for Government to be able to intervene, as it did during the Covid-19 pandemic, to ensure the resilience of the slot allocation system; • Increasing the slot usage ratio required for historic rights to 90%; 						

PINS ID	Question / Response
	<ul style="list-style-type: none"> • A strengthened role for the Coordination Committee, including the potential for an independent chair, to resolve issues in relation to slot allocation at an airport, with a strengthened reporting requirement. • Guidance on secondary criteria used for the allocation of slots from the pool. These criteria already include a reference to environmental considerations. The consultation envisages that the Secretary of State might issue additional criteria or guidance relevant to the UK specifically; • Powers for the Secretary of State to direct the UK slot coordinator (ACL) in specific circumstances where it is considered that guidelines or the regulation are not sufficiently clear; • A register of slots available for trade and strengthened oversight of secondary trading of slots between airlines. • Limits on the ability of airlines to lease slots to other airlines, whilst retaining their grandfather rights. It is proposed that there should be limits on the timeframe over which a slot can be leased before it must either be operated by the original airline or returned to the pool; <p><i>Newly created slots</i></p> <p>Rather than allocated from the pool using existing criteria, the Government is consulting on alternative mechanism for allocating newly created slots resulting from capacity expansion including:</p> <ul style="list-style-type: none"> • Auctioning newly created slots to the highest bidder; • Ring-fencing a proportion of slots for specific purposes, such as UK regional services; • Fixed duration historic rights for newly allocated slots (this would not alter pre-existing historic rights). It is suggested that such rights might be for 15 years. <p>Although the proposals suggest wide-ranging reforms to how slots are allocated, it would have little impact on the processes outlined within the GCG Framework, including the requirement to seek agreement to any removal of historic rights whether pre-existing or granted under a time limitation. The only directly relevant changes being consulted on relates to strengthening the role of the Coordination Committee and in terms of the ability of the Government to suggest secondary priorities for slot allocation, which could include enhanced environmental criteria.</p> <p>It is understood that the Government intend any changes to the current Airport Slot Allocation Regulations to take place by 2026.</p>
BCG.2.4	<p>Question: Question for All Local Authorities</p> <p>Updates on development Provide an update on any applications for planning permission or prior approval that have been submitted/ determined since the ExA's first written questions (ExQ1) [PD-010] that could either affect the Proposed Development or be affected by the Proposed Development and confirm whether these could change the conclusions reached in the Environmental Statement (ES).</p> <p>Could you also provide an update on the following applications:</p> <ol style="list-style-type: none"> 1. Wandon End Solar Farm; and 2. Bloor Homes application. <p>Response:</p> <p>The Applicant acknowledges the request by the ExA is directed at the Local Planning Authorities. However, the Applicant considers that a response from the Applicant may help to provide further clarification.</p> <p>As far as the Applicant is aware at the time of writing, the applications for Wandon End Solar Farm (LBC ref 22/01657/FUL and NHDC ref 22/03231/FP) and Bloor Homes (NHDC ref 17/00830/1) are still awaiting decisions.</p>

PINS ID	Question / Response
BCG.2.5	<p>Question:</p> <p>Statements of Common Ground (SoCGs) The ExA note that there are a significant number of matters which remain outstanding in the unsigned SoCGs. In addition, it notes that there are numerous references to meetings that are due to occur after D6. Whilst the ExA are encouraged that the Applicant is progressing these matters, given the limited time to the close of the Examination there is a concern that these matters may remain unresolved. To enable the ExA the opportunity, if necessary, to take the appropriate action please provide an update at D7 and D8 on progress with the SoCGs in relation to outstanding matters.</p> <p>Response:</p> <p>The Applicant is continuing to engage with the relevant interested parties on ongoing matters ahead of Deadline 9. The Applicant will provide an SoCG update at Deadlines 7 and 8, including details of meetings that have recently taken place and those that are scheduled to take place. Please refer to the SoCG Updates Document [TR020001/APP/8.106] submitted at Deadline 7.</p>
BCG.2.6	<p>Question:</p> <p>Section (s)106 – Heads of Terms (HoT) At D6 the Applicant provided a summary of the s106 HoT [REP6-072]. These differ from those included in the Planning Statement [REP5-016] (section 5.8) in that they no longer include a provision for highways works or the re-provision of Prospect Day Nursery. Explain why these are no longer included or if they are still required, where/how they should be secured.</p> <p>Response:</p> <p>The Highways contribution had initially been carried over from the Green Horizons Park Section 106 Agreement (linked to the permission 17/02300/EIA) but having reviewed the junctions covered by the Roads and Highway Improvement Contribution, the Applicant does not believe that they are impacted by the Proposed Development and that this contribution is therefore, not payable.</p> <p>The Roads and Highway Improvement Contribution will remain in the Green Horizons Park Section 106 Agreement.</p> <p>Further consideration has been given to the inclusion of obligations to Prospect House Day Nursery in the Applicant's Draft Section 106 Agreement [TR020001/APP/8.167]. This follows the submission of the Heads of Terms at Deadline 6 [REP6-072]. In terms of the re-provision of the nursery, a letter of intent has been signed with the nursery which provides assurance that the Applicant will work with the nursery to relocate their business at the end of their existing lease. The nursery owners have opted not to enter into a binding agreement at this stage since the property will not be required for several years yet.</p> <p>The Draft Section 106 Agreement [TR020001/APP/8.167] submitted at Deadline 7 confirms that the Applicant covenants with LBC that an assessment to confirm capacity requirements will be conducted prior to the acquisition/closure of Prospect House Day Nursery using compulsory acquisition powers in the Development Consent Order or through private agreement, and the results of the assessment will inform the relocation of the nursery. The change regarding the removal of the highway contribution has been agreed with Luton Borough Council.</p> <p>Luton Borough Council have been updated on the change to reinstate the commitment to assess nursery capacity requirement in the Draft Section 106 Agreement.</p>
BCG.2.7	<p>Question:</p> <p>s106 – Green Horizon Park (GHP) commitments The HoT provided at D6 [REP6-072] includes the GHP sports pitch and changing room re-provision contribution to provide a facility at either Stopsley/Lothair recreation ground or Ely Way/ Lewsey Park recreation ground, with replacement/ improvements to adult changing facilities at the same place. However, the GHP s106 [REP1-008] also includes the following financial contributions:</p>

PINS ID	Question / Response
	<ul style="list-style-type: none"> • £250,000 public art contribution; • £250,000 county wildlife contribution; • £30,000 biodiversity contribution; • £35,000 replacement tree contribution; • £3.45 million roads and highways improvement contribution; • £35,000 Raynham Way Neighbourhood Park Play contribution; and • £6,000 towards monitoring. <p>In addition, it requires the provision and layout of Wigmore Valley Park replacement land and includes an employment, skills, procurement and training strategy (Schedule 3 of the s106).</p> <p>Can you explain how/ where these contributions/ commitments would be secured and, if they are not being secured, why they would no longer be required?</p> <p><i>You may wish to combine the response with the answers to questions BCG.2.8, 2.9 and 2.10.</i></p> <p>Response:</p> <p>The GHP Section 106 Agreement is not being amended through the DCO and the obligations in that agreement will be triggered by the implementation of permission 17/02300/EIA. The Applicant's Response to Issue Specific Hearing 1 Actions 8 and 11: Note on existing/previous planning conditions and S106 obligations [REP5-098] submitted at Deadline 5, sets out the approach to the GHP Section 106 obligations. Since that document was submitted the Applicant has agreed with Luton Borough Council to remove the roads and highways improvement contribution from the DCO Draft Section 106 Agreement for the reasons set out in response BCG 2.6.</p>
BCG.2.8	<p>Question:</p> <p>s106 – GHP highways works</p> <p>The s106 for GHP would deliver £3.45 million contribution towards road and highways improvements in the vicinity of the development including:</p> <ul style="list-style-type: none"> • Castle Street Roundabout; • Junction of Castle Street/ Hibbert Street/ Windsor Street; • Junction of New Bedford Road/ Cromwell Road; • Junction of Windmill Road/ Osborne Road; and • Junction of Old Bedford Road/ Stockingstone Road/ Hitchin Road. <p>None of these works are included in the current application. Can you explain how these works would now be secured or, if they are no longer secured, why they would no longer be required.</p> <p><i>You may wish to combine the response with the answers to questions BCG.2.7, 2.9 and 2.10.</i></p> <p>Response:</p> <p>Please refer to response BCG 2.6.</p>
BCG.2.9	<p>Question: For LBC</p> <p>GHP s106 – Eaton Green Link Road</p> <p>Under the current s106 for GHP the Eaton Green Link Road can only open once the New Century Park (now GHP) access road is built as a fully functioning dual carriageway along its whole length. Would such a restriction still be required in relation to the Airport Access Road? If not, why not, and if it is signpost where/ how this would be secured.</p>

PINS ID	Question / Response
	<p><i>You may wish to combine the response with the answers to questions 2.7, 2.8 and 2.10.</i></p> <p>Response:</p> <p>The Applicant notes that this question is directed to LBC, however, the Applicant considers that a response from the Applicant will help provide further clarification.</p> <p>The Applicant considers the Eaton Green Road Link to be an integral part of the proposals for the Airport Access Road (AAR) and Phase 2a of the Proposed Scheme and would expect therefore that the use of the Eaton Green Link Road would be linked to the AAR.</p>
BCG.2.10	<p>Question:</p> <p>GHP s106 – Replacement land</p> <p>The GHP proposal would result in the loss of parts of Wigmore Valley Park. As a result, the GHP s106 includes a requirement that replacement land as shown on plan LLADCO-3B-CAP-LS-00-DR-LD-0021 rev P01.1 [REP4-073] is provided and laid out. Article 45 of the draft Development Consent Order (DCO) [REP5-003] would enable the implementation of both the GHP consent and the Proposed Development.</p> <ol style="list-style-type: none"> 1. The GHP replacement land is now included in the replacement land for the Proposed Development. Given this, confirm whether the implementation of both the GHP consent and the Proposed Development would result in the loss of additional parts of Wigmore Valley Park. If yes, would this result in a need to deliver additional replacement land and, if so, outline how much would be required and how it would be delivered/ secured. 2. Plan LLADCO-3C-ACM-WHS-GEN-DR-CE-0001 rev P01 [REP4-073] shows a hybrid industrial quarter on part of Wigmore Valley Park. The plan includes the annotation 'will not be implemented under either the DCO or the GHP permission'. However, looking at the plans submitted it would appear to be possible to partially, if not wholly, implement this element alongside the Proposed Development. This could result in the further loss of open space from Wigmore Valley Park and create a need for additional replacement land. Explain how the ExA can be confident that this element of the GHP permission would not be implemented and where this is secured. Alternatively, set out where/ how the additional replacement land needed to mitigate this loss would be delivered. <p><i>You may wish to combine the response with the answers to questions 2.7, 2.8 and 2.9.</i></p> <p>Response:</p> <p>In response to part 1 of this question, the Applicant notes that the Strategic Landscape Masterplan of the ES [APP-172] illustrates the proposed elements of GHP to be implemented as part of the DCO, this does not require additional replacement land.</p> <p>In response to part 2 of this question, the Applicant notes that the hybrid industrial quarter cannot be implemented under the GHP permission as the DCO requires the same land for Wigmore Valley Park. The Applicant would not be able to progress its DCO without developing WVP for landscape mitigation purposes. Requirement 8 of the DCO makes clear that <i>"No part of the authorised development containing landscaping mitigation may commence until for that part a landscaping scheme has been submitted to and approved in writing by the relevant planning authority"</i>.</p> <p>The ExA will be aware of the Hillside principle in planning, namely that a planning permission cannot be relied upon if the implementation of other planning permissions mean it is physically impossible to implement the original scheme. In this case, were the Applicant to develop WVP under the DCO, then it would be unable to rely upon the extant GHP permission.</p> <p>The Applicant does not consider that this needs to be secured in the DCO. Should the DCO be granted but not implemented, the Applicant would reserve its right to develop the land under the extant GHP permission, as it is lawfully permitted to do so. Any amends required to the GHP permission as a result of the</p>

PINS ID	Question / Response
	DCO will be dealt with under the Town and Country Planning Act 1990, as we have set out previously the Applicant does not intend to amend GHP through the DCO.
BCG.2.11	<p>Question:</p> <p>s106 – HoT Throughout the Examination the Applicant and various Interested Parties (IPs) have advised that certain mitigation measures would be needed and could be secured through the s106. These include, but are not limited to:</p> <ul style="list-style-type: none"> • request by Historic England [REP1-070] and [REP4-173]; • request by Bedfordshire Fire and Rescue Service [RR-0142]; • request by East of England Ambulance Service NHS Trust [RR-0401]; and • various requests from the Joint Host Authorities. <p>1. Applicant: Explain why these are not included in the current HoT and, if they are required, signpost where/ how these are being secured. 2. Interested Parties: List any further mitigation measures that should be included in the HoT with an explanation as to why.</p> <p>Response:</p> <p>The Applicant has included in the Draft Section 106 Agreement [TR020001/APP/8.167] obligations and commitments to mitigation where it is believed that such mitigation measures are required, and such measures are not provided for in the development consent order.</p> <p>The Applicant considers that the mitigation measures requested by the Interested Parties mentioned above are either not required or are already provided for in the development consent order and so there is no requirement to include further obligations in the Draft Section 106 Agreement.</p> <p>Historic England’s request was for financial contributions to be made towards the conservation of Luton Hoo RPG. The Applicant’s position is that such a contribution is not necessary as it would not reduce the less than significant harm caused which is caused by a slight increase in noise and visual changes to setting, rather than any physical change. This position was confirmed in the Applicant’s response to such a request by Historic England [REP4-173]. Please see the Applicant’s comment on the response to WQ PED.1.1.3 in REP5-052.</p> <p>With regards to Bedfordshire Fire and Rescue Service (BFRS), all issues have been agreed between the parties save for the request for ‘mutual aid’. This has been discussed between the parties and BFRS acknowledges that this is an existing agreement between the BFRS and the incumbent airport operator. The Applicant understands that discussions on the existing agreement are ongoing between the airport operator and BFRS reflecting the recent car park fire at the airport.</p> <p>The East of England Ambulance Service Trust (EEAST) in its relevant representation requested various mitigation measures (secured by a range of possible means) to mitigate and manage the impacts arising. The Applicant believes that all necessary and proportionate mitigation are already provided for in the application. For example, requirements for the provision of emergency access are set out in Appendix 4.2 Code of Construction Practice [REP6-003] of the ES, with construction related traffic movements managed by a Construction Traffic Management Plan [REP6-009] and a Construction Workers Travel Plan [APP-131].</p> <p>The Applicant does not believe that the measures proposed by EEAST require inclusion in the Draft Section 106 Agreement, but the Applicant recognises that continued engagement with EEAST will be important throughout the construction and operation of the Proposed Development</p> <p>Where considered appropriate by the Applicant specific requests from the Joint Host Authorities are included in the Draft Section 106 Agreement.</p>

PINS ID	Question / Response
BCG.2.12	<p>Question:</p> <p>s106 – Alternatives The Applicant intends to submit a completed s106 agreement at D9 (30 January 2024) [REP6-072]. However, should the s106 not be completed could any of the matters that would have been secured by the agreement be secured through other means eg a requirement? If so, provide details of which elements, how they could be secured and an appropriate form of drafting.</p> <p>Response:</p> <p>The Applicant notes that should the Section 106 Agreement not be completed then the intention is to secure the obligations unilaterally either through a unilateral undertaking or through the DCO.</p>
BCG.2.13	<p>Question:</p> <p>Traffic modelling – implications for air quality, health, and noise and vibration assessments</p> <ol style="list-style-type: none"> 1. Relevant Highway Authorities: Review the final report summarising the outcome of the accounting for Covid-19 in transport modelling that should be submitted by the Applicant on 15th December 2023 [AS-159]. Provide a summary of any outstanding concerns and what needs to be amended/included in order to satisfactory address the concern(s) by D7. 2. Applicant: If there are outstanding concerns please review and provide details of how they will be resolved during the Examination by D8. <p><i>You may wish to link the answer to this question with your response to question TT.2.1.</i></p> <p>Response:</p> <p>The Applicant notes that part 1 of this question is directed Relevant Highway Authorities and will review the information submitted by the Highway Authorities at Deadline 7, once they are published.</p> <p>In response to part 2 of this question, the Applicant confirms it will provide a response to outstanding matters raised by Relevant Highway Authorities at Deadline 8.</p>
BCG.2.14	<p>Question:</p> <p>Review and approval of plans and strategies relied upon by the Code of Construction Practice (CoCP) The CoCP [REP6-003] relies on numerous plans and strategies. The review and approval by the appropriate authority of at least three of these plans and strategies do not appear to be secured on the face of the DCO, or elsewhere. These are:</p> <ul style="list-style-type: none"> • appendix 17.7, the 'Groundwater, Ground Gas and Leachate Monitoring plan' [APP-127] • the Construction Surface Water Management Strategy, which will include management of flood risk during construction (referenced in section 18.2 of the CoCP); and • the Employment and Training Strategy [APP-215] (referenced in section 3.7 of the CoCP). <p>There are also a number of assessments, such as the assessment for unexploded ordnance (see ExQ2 DCO.2.4) that could be in this category.</p> <p>Please signpost where the review and approval of these documents by the appropriate authority is secured. If not secured anywhere, either propose appropriate amendments to the application to achieve this, or explain why this is not required.</p>

PINS ID	Question / Response
	<p>Response:</p> <p>Paragraph 7(1) of Schedule 2 to the DCO commits the Applicant to carrying out the authorised development, “<i>in accordance with the code of construction practice and the plans approved under the code of construction practice</i>”.</p> <p>Paragraphs 15.5.1 and 15.5.2 of the Code of Construction Practice [REP6-003] state that monitoring plans will be prepared and implemented and that such monitoring will be in accordance with the ‘Outline Remediation Strategy and Groundwater, Ground Gas and Leachate Monitoring Plan’, amongst others.</p> <p>Paragraph 18.2.1 of the Code of Construction Practice states that the “lead contractor will prepare a Construction Surface Water Management Strategy and paragraph 18.2.2 sets out what, as a minimum, that Strategy will include. The Applicant considers that compliance with the Groundwater, Ground Gas and Leachate Monitoring plan and the Construction Surface Water Management Strategy is therefore secured through Paragraph 7(1) of Schedule 2 to the DCO which commits the Applicant to carrying out the authorised development in accordance with the code of construction practice.</p> <p>The Employment and Training Strategy will be secured through the Section 106 Agreement.</p> <p>The Applicant’s response to ExQ2 DCO.2.4.is set out in the Applicant’s Response to Written Questions on the DCO [TR020001/APP/8.153].</p>
BCG.2.15	<p>Question:</p> <p>Imported material ExQ1 PED.1.6 4b [PD-010] asked for details of the off-site locations from which material for the proposed landform would, if needed, be sourced. You confirmed that the imported granular material volume would equate to approximately 543,000 m³ [REP4-061]. However, your response does not answer where this additional material would be sourced from.</p> <p>Please confirm where this would be sourced from or signpost where in the application documents this information is contained.</p> <p>Response:</p> <p>As outlined in the Environmental Statement Chapter 19 Waste and Resources Revision 1 [AS-081]</p> <ul style="list-style-type: none"> the assessment “is based on the current Proposed Development design and as such, detailed information relating to the exact sources and types of construction materials is not yet available. The sources of construction materials would be decided post consent by the construction contractor.” “It is assumed that the majority of key construction materials would be sourced regionally, taking into account the proximity principle and value for money.” <p>There are several source options, which need to be considered at the time of construction, to adequately meet the volume and quality requirement at each assessment phase. It should be noted that the approximate volume would need to be confirmed during detailed design, as well as following compaction trials, trial piles and stabilisation trials. It should also be noted that the import of materials will occur over the lifetime of the construction of the Proposed Development spanning some 15 years. Potential sources to be considered would include local quarries, review of other local infrastructure projects and recycled materials from other sites. Reuse of any materials would be subject to legislative requirements and Environment Agency guidance/requirements.</p>
BCG.2.16	<p>Question:</p> <p>Implementation of 19mppa consent At the November Hearings it was indicated that the Airport was in pre-application discussions regarding the submission of the information needed to discharge the conditions to enable the passenger cap to be raised to 19mppa. Can you provide an update/ timetable for the submission of the applications to discharge these conditions.</p>

PINS ID	Question / Response
	<p>Response:</p> <p>The airport operator is continuing pre-application discussions with LBC regarding the information needed to discharge conditions to enable the passenger cap to be raised to 19mppa. This information is currently being finalised and the operator is intending to submit this for approval in Q1 2024.</p>

