

January 2024

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.154 Applicant's Response to Written Questions - Green
Controlled Growth (GCG)**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.154

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.154 APPLICANT’S RESPONSE TO WRITTEN QUESTIONS –
GREEN CONTROLLED GROWTH (GCG)**

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Contents

	Page
1 Response to Examining Authority written questions – Green Controlled Growth	1
References	8

1 RESPONSE TO EXAMINING AUTHORITY WRITTEN QUESTIONS – GREEN CONTROLLED GROWTH

Table 1.1: Responses to the Examining Authority's Written Questions – Green Controlled Growth

PINS ID	Question / Response
GCG.2.1	<p>Question:</p> <p>No stepping back clause Provide further justification for the 'no stepping back' clause in paragraph 1.2.6 of the GCG Framework [REP5-022]. If Air Traffic Movements (ATMs) decrease over time, the higher limits may not serve to drive use of quieter aircraft. How would this support the policy objective of sharing benefits with the community?</p> <p>Response:</p> <p>The Applicant notes that the no 'stepping back' clause outlined in Paragraph 1.2.6 of the Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] relates to topics where Limits move to the next Phase based specifically on passenger throughput and is therefore relevant to greenhouse gases, surface access, and air quality (noting air quality Limits are a combination of timebound and passenger throughput-based Limits). Whilst it is intended that Noise Limits also change as passenger throughput increases, as set out in Section 3.2 of the Green Controlled Growth Explanatory Note [TR020001/APP/7.07], they are defined with respect to time to align with the five-year period used by the airport operator to implement Noise Action Plans. The Applicant will consider whether any amendments to drafting are required to clarify this point.</p> <p>The no 'stepping back' clause has been proposed by the Applicant as a positive commitment in recognition of the fact that Limits (for the most part) reduce over time for each new Phase. Once the airport has entered a new Phase of growth, and the more onerous Limits have been triggered, this clause does not then allow the airport operator to revert to the less onerous Limits, even in the event where passenger throughput decreases. For example, considering the surface access Limits, non-sustainable mode share for both passengers and staff must decrease over time, secured through the Limits dropping for each Phase. For passengers, the Limit lowers from 62% to 60% once 21.5mppa is reached, and then lowers again to 55% once 27mppa is reached, which must then be maintained. In this scenario, once 27mppa has been achieved, the Limit of 55% will apply even if passenger throughput then reduced to 26mppa in future. As stated, this is therefore a positive commitment to secure the more onerous Limits in this scenario.</p> <p>For noise, as noted in paragraph 3.1.16 of the GCG Explanatory Note [TR020001/APP/7.07], the Limits are set with respect to time to reflect the five-year Noise Action Plan cycle. This means that the 'stepping back' clause in Paragraph 1.2.6 of the GCG Framework [TR020001/APP/7.08] does not apply for noise. The Need Case [AS-125] shows the long-term trajectory expected for aircraft movements but there could be variations in individual years if, for example, the pace of introduction of larger aircraft exceeded passenger growth in an individual year. However, such effects are likely to be transient around the long term trend of growth in the number of aircraft movements. It is notable that even during the Covid-19 pandemic when aircraft movements fell, this was only temporary, and aircraft movements have mostly returned to pre-pandemic levels. However, if there were a situation in which aircraft movements were to fall, this would result also in noise levels falling (as this would result in fewer flights by aircraft with the same noise performance) and the airport would still need to operate below the noise Limits which are steadily decreasing until 2039. In addition, the Noise Limit Review requires testing of the Limits against technology improvements <i>and</i> updated forecasts (see paragraphs 3.2.30 and 3.2.31 of the GCG Explanatory Note [TR020001/APP/7.07]). Such forecasts would take into account any decreased movements were they to have occurred. Finally on the policy objective of sharing the benefits, paragraphs 3.3 and 3.29 of the Aviation Policy Framework (Ref 1) , from where the concept of sharing the benefits originated, is clear that sharing the benefits should be interpreted within the context of growth within the aviation industry and the wider economic and consumer benefits that flow from that growth.</p>
GCG.2.2	<p>Question: Question is addressed to All Local Authorities</p> <p>Increase of thresholds, limits and contours Confirm whether any additional wording is required in the GCG framework [REP5-022] to limit the circumstances in which an increase in the thresholds, limits or contours could be allowed, for example in paragraph 2.3.4 of the framework.</p>

PINS ID	Question / Response
	<p>Response:</p> <p>The Applicant notes that this question is directed to All Local Authorities, however the Applicant considers that a response from the Applicant will help provide further clarification. Paragraph 2.3.4 of the GCG Framework [TR020001/APP/7.08] already specifies that there will be no ability to modify GCG Thresholds or Limits (including noise contours) to permit materially worse environmental effects than those identified in the Environmental Statement. Within this overarching commitment, the Local Authorities have agreed that noise Thresholds and Limits could increase as a result of a review triggered under GCG by the approval of an Airspace Change Proposal to provide for flight path alternation and resulting periods of predictable respite for overflown communities. In any case, the airport operator cannot unilaterally change Thresholds or Limits and must apply to the ESG to do so. As such, it is not considered that any additional wording is required.</p>
GCG.2.3	<p>Question:</p> <p>Circumstances beyond the operator's control In the GCG Explanatory Note [REP5-020, paragraph 2.2.39] it states:</p> <p><i>'Generally, where the airport operator puts forward a case that the exceedance of a threshold or breach of a limit is due to circumstances beyond their control, they will be expected to demonstrate that the circumstances were:</i></p> <ul style="list-style-type: none"> <i>a. not permanent in nature;</i> <i>b. outside of the control or influence of the airport operator; and</i> <i>c. directly related to the measured exceedance of a Threshold or breach of a Limit.'</i> <p>Clarify if this statement is intended to mean that all of these circumstances have to be in place to demonstrate that matters are outside their control or only an individual circumstance?</p> <p>Response:</p> <p>The Applicant notes that all of these circumstances would need to be in place, which is why this requirement uses the word 'and' rather than 'or'. As set out in Paragraph 2.2.41 of the GCG Explanatory Note [REP5-020] with an updated version submitted at D7 [TR020001/APP/7.07], the airport operator would need to demonstrate to the ESG that all these criteria were in place, and if this is the case the ESG, acting reasonably, should certify that the exceedance was due to circumstances beyond the operator's control.</p>
GCG.2.4	<p>Question:</p> <p>Noise contours based on core planning case The ExA wishes to understand the difference that using the core case to develop noise contours, limits and thresholds would have on the controls within the GCG framework. Provide an alternative Table 3.1 of the GCG framework [REP5-022] updating the limits and thresholds so that they are based on the core planning case rather than the faster growth case.</p> <p>Response:</p> <p>Table 1 presents indicative GCG Limits and Thresholds based on the Core Case. The Limits and Thresholds are different only in assessment Phase 1. Whilst the contour area Limits are smaller (4 - 7% during the daytime and 1 – 5% during the night-time), the effect on noise levels is negligible. As was noted in the Applicant's ISH9 Post Hearing Submission [REP6-067], the difference in noise levels between the Core case and Faster Growth case at all air noise assessment locations listed in Chapter 16 of the ES [REP1-003] is 0.3 to 0.6 dB for daytime and 0.2 to 0.3 dB during the night-time. Furthermore, as summarised in Table 16.74 of Chapter 16 of the ES [REP1-003], the conclusions of residual significant effects are the same for the Core Case and Faster Growth case.</p>

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	<p>Table 1: Indicative GCG Limits and Thresholds based on the Core Case (actual Limits and Thresholds shown in brackets)</p> <table border="1"> <thead> <tr> <th style="background-color: #1a2b3d; color: white;">Limit</th> <th style="background-color: #1a2b3d; color: white;">Up to 2028</th> <th style="background-color: #1a2b3d; color: white;">2029 – 2033</th> <th style="background-color: #1a2b3d; color: white;">2034 – 2038</th> <th style="background-color: #1a2b3d; color: white;">2039 - 2043*</th> <th style="background-color: #1a2b3d; color: white;">2044 onwards (in 5 year cycles)*</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Average summer day-time noise levels, as measured by size (km²) of 54 dB L_{Aeq,16hr} noise contour</td> <td colspan="5" style="text-align: center;">Limit</td> </tr> <tr> <td>31.3 (33.6)</td> <td>30.4 (32.8)</td> <td>29.6 (30.7)</td> <td>32.6 (32.6)</td> <td>32.6 (32.6)</td> </tr> <tr> <td colspan="5" style="text-align: center;">Level 2 Threshold (95% of limit)</td> </tr> <tr> <td>29.7 (31.9)</td> <td>28.9 (31.2)</td> <td>28.1 (29.2)</td> <td>31.0 (31.0)</td> <td>31.0 (31.0)</td> </tr> <tr> <td colspan="5" style="text-align: center;">Level 1 Threshold (85% of Limit)</td> </tr> <tr> <td>26.6 (28.6)</td> <td>25.8 (27.9)</td> <td>25.2 (26.1)</td> <td>27.7 (27.7)</td> <td>27.7 (27.7)</td> </tr> <tr> <td rowspan="6">Average summer night-time noise levels, as measured by size (km²) of 48 dB L_{Aeq,8hr} noise contour</td> <td colspan="5" style="text-align: center;">Limit</td> </tr> <tr> <td>42.6 (44.8)</td> <td>41.5 (42.8)</td> <td>39.7 (40.1)</td> <td>43.2 (43.2)</td> <td>43.2 (43.2)</td> </tr> <tr> <td colspan="5" style="text-align: center;">Level 2 Threshold (95% of limit)</td> </tr> <tr> <td>40.5 (42.6)</td> <td>39.4 (40.7)</td> <td>37.7 (38.1)</td> <td>41.0 (41.0)</td> <td>41.0 (41.0)</td> </tr> <tr> <td colspan="5" style="text-align: center;">Level 1 Threshold (85% of Limit)</td> </tr> <tr> <td>36.2 (38.1)</td> <td>35.3 (36.4)</td> <td>33.7 (34.1)</td> <td>36.7 (36.7)</td> <td>36.7 (36.7)</td> </tr> </tbody> </table> <p>It should be noted that, commensurate with the lower noise values that would arise with the Core Case, the delivery of economic benefits is slower with the Core Case than with the Faster Growth Case. The differences are illustrated in Appendix F of the Need Case [APP-214]. The Applicant considers that advancing these economic benefits would provide a balance to any relatively small differential noise implications of adopting Limits and Thresholds based on the Faster Growth Case.</p>	Limit	Up to 2028	2029 – 2033	2034 – 2038	2039 - 2043*	2044 onwards (in 5 year cycles)*	Average summer day-time noise levels, as measured by size (km ²) of 54 dB L _{Aeq,16hr} noise contour	Limit					31.3 (33.6)	30.4 (32.8)	29.6 (30.7)	32.6 (32.6)	32.6 (32.6)	Level 2 Threshold (95% of limit)					29.7 (31.9)	28.9 (31.2)	28.1 (29.2)	31.0 (31.0)	31.0 (31.0)	Level 1 Threshold (85% of Limit)					26.6 (28.6)	25.8 (27.9)	25.2 (26.1)	27.7 (27.7)	27.7 (27.7)	Average summer night-time noise levels, as measured by size (km ²) of 48 dB L _{Aeq,8hr} noise contour	Limit					42.6 (44.8)	41.5 (42.8)	39.7 (40.1)	43.2 (43.2)	43.2 (43.2)	Level 2 Threshold (95% of limit)					40.5 (42.6)	39.4 (40.7)	37.7 (38.1)	41.0 (41.0)	41.0 (41.0)	Level 1 Threshold (85% of Limit)					36.2 (38.1)	35.3 (36.4)	33.7 (34.1)	36.7 (36.7)	36.7 (36.7)
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GCG.2.5	<p>Question:</p> <p>Aviation Environmental Design Tool (AEDT) noise model The Hertfordshire Local Authorities [REP6-100] expressed concern that a new model developed from scratch might be used to undertake future noise modelling. Confirm whether the AEDT noise model and inputs used to forecast noise impacts from the Proposed Development would be used for any future GCG monitoring rather than a new model and, if not, why not?</p> <p>Response:</p> <p>The Applicant is unable to find any reference to development of new noise models in [REP6-100] or in any other D6 submission from the Hertfordshire Local Authorities.</p>																																																																				

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	<p>Paragraph 3.3.1 of the GCG Framework [TR020001/APP/7.08] is clear that the 'DCO noise model' will be maintained as the basis for planning for growth and noise control at the airport to ensure that future noise forecasts can be consistently compared with the noise Limits and Thresholds set by the DCO using the same model (comparing 'like with like'). The 'DCO noise model' is defined in Annex C1 of the Aircraft Noise Monitoring Plan [Appendix C of TR020001/APP/7.08] including specification of the AEDT noise model and its assumptions and inputs to ensure consistency for future noise modelling.</p>
GCG.2.6	<p>Question:</p> <p>Noise Envelope Design Group (NEDG) review of final noise envelope In light of comments at Issue Specific Hearing (ISH) 8 regarding consultation on the final noise envelope, confirm whether it would be possible for the presently disbanded NEDG to provide comments on the final noise envelope design. Also confirm whether there is time within the examination timetable to allow submission of comments on any NEDG response by IPs prior to the end of the Examination.</p> <p>Response:</p> <p>The Applicant has discussed this Written Question with the NEDG's Independent Chair who noted that as the noise envelope is now closely aligned with the original recommendations, that NEDG members are actively engaged with the DCO process and are making their voices heard, that consequently sees little to be gained from reconstituting and reconvening the NEDG at this stage. The Applicant agrees with this position.</p> <p>The Noise Envelope Design Group (NEDG) issued their Final Report and recommendations in December 2022. The letter from the Independent Chair of the NEDG accompanying the report was clear that "The Group recognise that it is for Luton Rising to design the noise management model that will appear in their DCO but hope you will be informed by our extensive deliberations."</p> <p>The recommendations were considered in detail by the Applicant and the proposed Noise Envelope was submitted alongside all the DCO submission documents in February 2023. The NEDG Interim and Final Reports were included in Annex A of Appendix 16.2 of the Environmental Statement [REP4-023]. The Applicant's response to the NEDG recommendations and how they have been addressed in the Noise Envelope design was provided in Annex B of the same appendix.</p> <p>Following this submission, the DCO application entered examination in August 2023. Since then, the application and the Noise Envelope have been heavily examined and scrutinised by the Planning Inspectorate, Host Local Authorities, members of the public, and community groups including LADACAN. Noise and noise controls were identified as a principal issue for the examination and have received a great deal of scrutiny.</p> <p>As part of the examination there have been three rounds of open floor hearings (open to the public), two rounds of issue specific hearings, two sets of examination Written Questions and six deadlines at which any Interested Party could submit comments and representations on the proposals. The Noise Envelope and its design has featured in every one of these. They are likely to continue to feature in the remaining four deadlines until the examination closes in February 2024.</p> <p>Whilst the NEDG as a single entity is disbanded, the individual members of the NEDG have had many opportunities to provide comments on the evolving Noise Envelope design (and will continue to have opportunity until the close of the examination), and many of the members, particularly the Host Authorities and LADACAN, have provided multiple rounds of comments. The following former members of the NEDG have provided comments on the evolving Noise Envelope design throughout the examination:</p> <ol style="list-style-type: none"> a. Luton Borough Council; b. Hertfordshire County Council; c. North Hertfordshire County Council; d. Central Bedfordshire Council; e. Buckinghamshire County Council;

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	<p>f. LADACAN; and g. Suono</p> <p>The only former NEDG members (that are not themselves disbanded) that have not provided comments are:</p> <p>a. easyJet; b. DHL; c. Signature Flight Support; and d. London Luton Airport Operations Ltd</p> <p>The Applicant's view is that, given the extensive feedback on the evolving noise envelope design as described above, and the fact that most members of the NEDG have provided extensive feedback and will continue to do so through to the end of the examination, there is limited benefit in separately seeking feedback from the NEDG as a combined entity and doing so would be unlikely to provide any new information into the examination.</p> <p>There are also practical implications for timing and it is unlikely to be possible to regroup the NEDG and give the group sufficient time to discuss as a group and come to a consensus view and for that to then be reported in time for a submission that would also allow Interested Parties to consider and then respond in turn.</p> <p>The Applicant notes that there are remaining deadlines for any Interested Parties, including former NEDG members, to submit comments, and encourages them to do so.</p>
GCG.2.7	<p>Question:</p> <p>Airspace change sensitivity test Table 12.40 of Appendix 16.1 Noise and Vibration Information [AS-096] includes a sensitivity test for the worst-case noise impacts arising from the Airspace Change Process and concludes that contour area changes are 2-6% less than predicted in the core case. Since the Airspace Change is predicted to reduce contour areas, explain why, following the discussions at ISH9, the GCG Framework needs to include a mechanism that allows for an increase as well as a decrease in noise contour areas.</p> <p>Response:</p> <p>The Applicant notes that the referenced sensitivity test was carried out to demonstrate that airspace changes are likely to be accommodated within the DCO Noise Envelope Limits, i.e. the GCG Limits would not fetter the ability of airspace change to be delivered at London Luton Airport in isolation, based on the currently available information at this early stage of the airspace change process. However, given the progress of airspace change more generally and the potential further implications of the need to coordinate airspace change across a number of airports in FASI-S (Future Airspace Strategy Implementation – South), there could be further changes designed to optimise airspace overall that could result in increases in the contour area Limit following a demonstration that it would not result in materially worse environmental effects than those identified in the ES, and following completion of a Noise Limit Review approved by the Environmental Scrutiny Group. An example agreed with the Local Authorities (see [REP6-094]) is where noise Thresholds and Limits could increase as a result of a review triggered under GCG by the approval of an Airspace Change Proposal which results in a larger noise contour area but with a noise benefit, for example due to fewer people within the noise contour due to a change in shape. It is therefore not possible to conclude at this stage that future airspace change would only result in a decrease in noise contour area Limits.</p>
GCG.2.8	<p>Question:</p> <p>Additional noise monitoring Explain whether any additional noise monitoring is being proposed over and above the basic monitoring that would be required to satisfy any future airspace change. Also clarify whether the quoted distances in paragraph C4.2.3 of Appendix C Aircraft Noise Monitoring Plan [REP5-028] should be 6.5 kilometres (km) from start of roll and 2km (<i>our emphasis</i>) from the landing threshold, rather than 2.5km? It is understood that the International Civil Aviation Organisation (ICAO) requirement of 2.5km relates to light aircraft.</p>

PINS ID	Question / Response
	<p>Response:</p> <p>The Applicant notes that additional noise monitoring is proposed in paragraph C4.2.3 of the Aircraft Noise Monitoring Plan [Appendix C of TR020001/APP/7.08]. As noted in that paragraph, this additional monitoring is proposed in response to recommendations from the Noise Envelope Design Group. The monitoring is not required to satisfy any future airspace change. As noted in response to WQ GCG.1.2 [REP5-090], the airport's current permanent noise monitoring terminals are already compliant with the Civil Aviation Authority's requirements for monitoring with relation to airspace change (Ref 2).</p> <p>As noted in response to ISH9 Action 21, the Applicant's ISH9 Post Hearing Submission [REP6-067], the commitment to install additional monitors at 2.5km from the runway was in response to the NEDG recommendation that "Additional monitoring locations closer to the airport should be considered for the monitoring of noise abatement procedures, but not linked to fining." (see Section 2.3.3 of the NEDG Interim Report in Annex A of Appendix 16.2 of the ES [REP4-023]). The NEDG recommendation was not explicit that the location should be exactly 2.5km from start of roll, just that it should be closer to the airport. The NEDG recommendation was also not related to International Civil Aviation Organization certification for light aircraft. To provide clarification on this point, and for reasons of practical limitations as outlined in Applicant's ISH9 Post Hearing Submission [REP6-067], paragraph C4.2.3 of the Aircraft Noise Monitoring Plan [Appendix C of TR020001/APP/7.08] has been updated to require that additional monitoring locations will be agreed "at locations closer to the airport (for example within 2.5km from each end of the runway)".</p>
GCG.2.9	<p>Question:</p> <p>Additional air quality monitoring The Applicant's response to ISH9 Action Point 26 regarding air quality monitoring [REP6-076] explains at paragraph 2.2.2 that collocation calibration would be undertaken for the proposed indicative MCERTS air quality monitors. Can the Applicant confirm whether 12 monthly calibration or calibration on moving equipment is secured in the GCG framework [REP5-022]? If not, should it be for consistency with the Environment Agency MCERTS: Performance Standards for Indicative Ambient Particulate Monitors?</p> <p>Response:</p> <p>As set out in the Deadline 6 Submission - 8.147 Applicant's Response to Issue Specific Hearing 9 Action 26 - Air Quality Monitoring [REP6-076] the automatic monitoring equipment proposed is to be indicative "<i>AQMesh or equivalent</i>" as different equipment suppliers will have different calibration requirements it would not be suitable to confirm at this stage the detail of a calibration regime. Notwithstanding this, the Applicant confirms that whatever system is used, it will at all times be maintained and calibrated equipment in line with manufacturer requirements. The Applicant has also confirmed in [REP6-076] that "<i>The monitoring will be subject to a rigorous quality assurance (QA)/quality control (QC) procedure</i>".</p>
GCG.2.10	<p>Question: Question is addressed to All Local Authorities</p> <p>Automatic Number Plate Recognition (ANPR) data Do you consider that a specific mechanism is required in the draft DCO to agree the location and approach to monitoring traffic using ANPR, or similar, to inform air quality impacts in Appendix D of the GCG framework [REP5-028]? If not, why not?</p> <p>Response:</p> <p>The Applicant notes that this question is directed to All Local Authorities, however the Applicant considers that a response from the Applicant will help provide further clarification. As per the Applicant's previous response to GCG.1.10 in the Applicant's Response to Written Questions – Green Controlled Growth (GCG) [REP-5-090] the drafting of the Draft DCO [TR02001/APP/2.01] and GCG Framework [TR020001/APP/7.08] reflect the need for future flexibility to reflect the long term nature of the Proposed Development and that new and as yet unknown monitoring methods and practices may be available over the course of the next 20 years while the Proposed Development is delivered. ANPR traffic surveys are one method that could be used to determine the airport's impact but may not be the most appropriate method depending on the nature and timing of any exceedance; similarly, the location of any monitoring equipment could change depending on the location of the recorded exceedance and potential future changes to the road network. As per the response to GCG.1.10, the proposed approach mirrors the most similar precedent for the ongoing monitoring and management of air quality for a Nationally Significant Infrastructure Project used by the Silvertown Tunnel.</p>

PINS ID	Question / Response
GCG.2.11	<p>Question:</p> <p>Short term emissions to air Can the GCG framework [REP5-022] be updated to explain that short-term emissions limits would be monitored for an initial period and that short term limits could be applied in future if initial monitoring determined that there were exceedances of the relevant legal limits and relevant exposure? If not, why not?</p> <p>Response:</p> <p>The Applicant notes that the Green Controlled Growth Framework Appendix D – Air Quality Monitoring Plan [REP5-030] has been updated at Deadline 7 [Appendix D of TR020001/APP/7.08] to confirm that for short term monitoring results <i>“The Monitoring Report will also include short term monitoring results, but will be for information only, and it is not proposed that the GCG Framework incorporates Limits or Thresholds for short term emissions.”</i></p> <p>Based on the monitored and modelled annual mean concentrations, the impact of NO₂, and PM₁₀ are not considered to be at risk of exceeding the short term standards as outlined in Chapter 7 [APP-076], Paragraphs 7.7.7 and 7.7.8, therefore an assessment of short term effects was scoped out. This is in line with the guidance outlined within the Defra LAQM Technical Guidance (2022). It should be noted there are only national standards for short term effects associated with NO₂ (1-hour mean of 200µg/m³ not to be exceeded more than 18 times in a year) and PM₁₀ (24-hour mean of 50µg/m³ not to be exceeded more than 35 times in a year).</p> <p>In addition, it should be noted that exposure to short term effects is influenced by a range of lifestyle and travel choices. Short term exposure would only be relevant at locations where people spend time equivalent to the short term target. Attributing short term peaks to the airport would be a significant challenge as there are a large number of local variables which could have an influence. As the ES has demonstrated there are no likely exceedances of the short term objectives it is not considered necessary to include targets for short term monitoring and the GCG Framework should not be required to potentially include short term Limits in future.</p>

REFERENCES

Ref 1 Her Majesty's Stationery Office (2013), *The Aviation Policy Framework*.

Ref 2 Civil Aviation Authority, (2021); CAP 2091: CAA Policy on Minimum Standards for Noise Modelling