Luton Rising

Our airport.
Our community.
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August 2023

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

8.31 Applicant's Response to Relevant Representations - Part 2C of 4 (Non-Statutory Organisations)

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.31

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

London Luton Airport Expansion Development Consent Order 202x

8.31 APPLICANT'S RESPONSE TO RELEVANT REPRESENTATIONS PART 2C OF 4 (NON-STATUTORY ORGANISATIONS)

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3.4 Non-statutory Organisations

Table 3.3: Responses to Relevant Representations made by non-statutory organisations

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Bristol Airport Action Network RR-0164	Climate Change	We consider that to expand the airport and to therefore emit considerable amounts of extra carbon in this time of climate emergency is wrong. It will also mean that it will be very difficult for the UK to meet its legal commitment of net-zero by 2050 as the contribution from aviation will continue to increase while all other sectors will have to decarbonise.	This comment is noted. It appears to reflect the grounds for challenge made by the respondent at the judicial review into the Bristol Airport decision High Court case No: CO/928/2022. In all cases, the judge found that the grounds of challenge failed. Carbon emissions for aviation in the Environmental Statement (ES) are modelled on the Jet Zero Strategy (Ref 1) High Ambition scenario that represents current UK Government policy on aviation. The greenhouse gas emissions from aviation at London Luton Airport will be managed and capped by the UK Emissions Trading Scheme (UK ETS) within the European Economic Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). UK ETS sets an overall, scheme-wide cap on the amount of carbon which may be emitted by operators, including participating airlines. The available allowances place a cap on the total

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			amount of GHG emissions that can be emitted by sectors, including aviation, covered by the UK ETS. This cap will be reduced over time stimulating innovation by participants to increase the carbon efficiency of their operations, or indeed to take steps which would reduce the overall scale of their operations. This effectively puts a binding cap on the amount of GHG emissions the aviation sector can emit. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050. CORSIA works alongside other measures to offset CO_2 emissions that cannot be reduced through the use of technological improvements, operational improvements, and sustainable aviation fuels (SAF) with emissions units from the carbon market. CORSIA aims to ensure that international aviation's net carbon emissions do not increase from 2020 levels. Participating airlines are required to monitor their emissions and report them to their respective national authorities. These authorities verify the

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			reported emissions and ensure compliance with CORSIA regulations. Currently the scheme is voluntary and serves as a pilot phase. From 2027 onward, all eligible international flights will be required to offset their emissions above the baseline level. Further, Paragraph 3.57 of the Jet Zero Strategy sets out that "*we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth*". The Applicant is aware that the rate of expansion of London Luton Airport is broadly aligned to the Jet Zero Strategy High Ambition Scenario, which reinforces the view that the Application aligns with Government ambitions on carbon reduction.
Cambridge and Peterborough Climate Action Coalition RR-0173	Climate Change	The UK Governments own Climate Change Committee has stated, in its 2022 report, "The government isn't doing enough to curb demand in aviation growth"; is making, "little tangible progress"; is excessively "reliant on technology"; of the 13 recommendations contained in the 6th Carbon Budget, 4 are making "insufficient progress" and 6 are making "no progress at	Whilst the Committee on Climate Change did recommend that there should be "no net expansion of UK airport capacity unless the carbon intensity of aviation can accommodate additional demand", this was not accepted by Government, see the Government's response to Recommendation #197 in HM Government's Report 'Responding to the Climate Change Committee's (CCC) Annual

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		all"; no fiscal policy is being applied to manage demand viz taxation, quotas or a frequent flyer levy. And finally: "There should be no net expansion of UK airport capacity unless the carbon intensity of aviation can accommodate additional demand".	Progress Report 2022 Recommendations' of March 2023 (Ref 2). Recommendations from the CCC are not legally binding. The UK Government has set a legally binding target, under Section 1 of the Climate Change Act 2008, to achieve net-zero greenhouse gas emissions by the year 2050 and to meet their 5-yearly carbon budgets. It has introduced a range of measures to control carbon. For example, the Jet Zero Strategy is the government strategy on how aviation will contribute to meeting the UK's climate change commitments. Paragraph 3.57 sets out that "*we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth*". The Applicant is aware that the rate of expansion of London Luton Airport is broadly similar to the Jet Zero Strategy High Ambition Scenario, which reinforces the view that the Application aligns with Government ambitions on carbon reduction. The effectiveness of aviation mitigation measures such as those described in the Jet Zero Strategy will be supported by market-

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			based measures including the UK ETS and CORSIA acting as control mechanisms. The greenhouse gas emissions from aviation at Luton Airport will be managed and capped by the UK ETS within the European Economic Area, and the global CORSIA. UK ETS sets an overall, scheme-wide cap on the amount of carbon which may be emitted by operators, including participating airlines. The available allowances place a cap on the total amount of GHG emissions that can be emitted by sectors, including aviation, covered by the UK ETS. This cap will be reduced over time stimulating innovation by participants to increase the carbon efficiency of their operations, or indeed to take steps which would reduce the overall scale of their operations. This effectively puts a binding cap on the amount of GHG emissions the aviation sector can emit. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050. CORSIA works alongside other measures to offset CO2 emissions that cannot be reduced

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			through the use of technological improvements, operational improvements, and sustainable aviation fuels (SAF) with emissions units from the carbon market. CORSIA aims to ensure that international aviation's net carbon emissions do not increase from 2020 levels. Participating airlines are required to monitor their emissions and report them to their respective national authorities. These authorities verify the reported emissions and ensure compliance with CORSIA regulations. Currently the scheme is voluntary and serves as a pilot phase. From 2027 onward, all eligible international flights will be required to offset their emissions above the baseline level.
Cambridge Friends of the Earth RR-0174	Climate Change	Cambridge Friends of the Earth is deeply concerned about this proposal, which is being considered as a National Infrastructure Project even though the Government's own Climate Change Committee are saying, "no net airport expansion". Our opposition to this development will highlight both its potential contribution to Climate Change and the falsehoods surrounding any attempts to present the development as 'Net Zero' in any shape or form. Cambridge Friends of	Whilst the Committee on Climate Change did recommend that there should be *"no net expansion of UK airport capacity unless the carbon intensity of aviation can accommodate additional demand",* this was not accepted by Government, see the Government's response to Recommendation #197 in HM Government's Report 'Responding to the Climate Change Committee's (CCC) Annual Progress Report 2022 Recommendations' of

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		the Earth considers this application to be totally unacceptable in a time of Climate Change and, additionally, considers its potential impact on the local environment and residents to be excessive.	March 2023. Recommendations from the CCC are not legally binding. The UK government has set a legally binding target, under section 1 of the Climate Change Act 2008, to achieve net-zero greenhouse gas emissions by the year 2050 and to meet their 5-yearly carbon budgets. It has introduced a range of measures to control carbon. For example, the Jet Zero Strategy is the government strategy on how aviation will contribute to meeting the UK's climate change commitments. Paragraph 3.57 sets out that "*we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth*". The applicant is aware that the rate of expansion of Luton airport is broadly similar to the Jet Zero Strategy High Ambition Scenario, which reinforces the view that the Application aligns with Government ambitions on carbon reduction. The effectiveness of aviation mitigation measures such as those described in the Jet Zero Strategy will be supported by market-based measures including the UK ETS and

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			CORSIA acting as control mechanisms. The greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK ETS within the European Economic Area, and the global CORSIA. UK ETS sets an overall, scheme-wide cap on the amount of carbon which may be emitted by operators, including participating airlines. The available allowances place a cap on the total amount of GHG emissions that can be emitted by sectors, including aviation, covered by the UK ETS. This cap will be reduced over time stimulating innovation by participants to increase the carbon efficiency of their operations, or indeed to take steps which would reduce the overall scale of their operations. This effectively puts a binding cap on the amount of GHG emissions the aviation sector can emit. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050. CORSIA works alongside other measures to offset CO_2 emissions that cannot be reduced through the use of technological

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			improvements, operational improvements, and SAF with emissions units from the carbon market. CORSIA aims to ensure that international aviation's net carbon emissions do not increase from 2020 levels. Participating airlines are required to monitor their emissions and report them to their respective national authorities. These authorities verify the reported emissions and ensure compliance with CORSIA regulations. Currently the scheme is voluntary and serves as a pilot phase. From 2027 onward, all eligible international flights will be required to offset their emissions above the baseline level
Chilterns Society RR-0226	Landscape and Visual	The Chiltern Society strongly objects to the further development of Luton Airport. Further massive expansion of an airport in the south east cannot be consistent with the Government's 'levelling up' policy. The site is wholly located within the Chiltern Society area and our principal concerns with the proposed London Luton Airport expansion relate to incursions into the Green Belt, the loss of accessible open countryside, and the effects of increased aircraft movements above the Chilterns AONB. In the Landscapes Review (Glover Report), and the Government's response,	Luton is a Priority 1 area for levelling up, and there are also local Priority 2 areas, so the application is entirely consistent with overall priorities for levelling up in the light of the contribution that the airport makes to the economy of Luton. Replacement of open space and habitats is provided within the Proposed Development as described in **ES Chapter 14 [AS-079]** and the **Strategic Landscape Masterplan [APP-172]**. Effects on the Chilterns AONB are assessed and reported in ES Chapter 14 **[AS-079]**.

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		the Chilterns have become 'more important' with more emphasis on its conservation, addressing climate change and nature recovery. The airport expansion goes against this.	
Chilterns Society RR-0226	Landscape and Visual	We also note that Natural England's current Designations Programme includes a proposal to extend the designated area of the Chilterns AONB. We understand that land to the south and east of Luton in the vicinity of the airport could be included in the area of search for designation; indeed, the Chiltern Society considers that land in this area is of sufficient quality to meet the 'natural beauty' criterion for designation and will be advocating for its inclusion in the AONB.	All areas and relevant receptors within the study area for the Landscape and Visual assessment, including the area in question to the south and east of the airport, have been assessed and reported in the ES (**Chapter 14 of the ES [AS-079**]). Appropriate mitigation to reduce identified impacts in this area has been included in the landscape proposals as part of the Proposed Development and further detailed design secured by Requirements of the DCO. In addition, the Applicant acknowledges the proposed search area is one of the options considered for a boundary variation and that it does not confer any additional planning protection. However, a sensitivity test has been undertaken and likely changes to assessment conclusions, should this area gain the additional planning protection as an extension of the AONB, are reported in ES **Appendix 14.9 [APP-107]**.

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Chilterns Society RR-0226	Landscape and Visual	The expansion of the airport would lead to increased flights which would have impacts on the tranquillity of the Chilterns AONB and air quality in and around the airport.	**Chapter 14 Landscape and Visual of the ES [AS-079]** considers tranquillity in that assessment of landscape effects and reports the conclusion of the assessment including effects on the Chilterns AONB. **Chapter 7 Air Quality of the ES [AS-076]** reports the findings of the air quality assessment and concludes no significant adverse effect as a result of the Proposed Development.
Chilterns Society RR-0226	Landscape and Visual	The expansion would lead to incursions into the surrounding Green Belt	The Applicant has carried out a Green Belt Assessment and this is provided in **Appendix B [APP-196]** of the **Planning Statement [APP-194]**.
Chilterns Society RR-0226	Landscape and Visual	The loss of valuable public open space and habitats at Wigmore Valley Park would be unacceptable.	The Applicant has undertaken extensive surveys and assessment and designed suitable mitigation in the Proposed Development. Extensive replacement of open space and habitats is provided with the Proposed Development as described in **ES Chapter 4 [APP-031]** and the **Strategic Landscape Masterplan [APP-172]**.
Chilterns Society RR-0226	Landscape and Visual	Insufficient assessments have been made of potential impacts on the AONB (including the possible area of expansion).	The **Chapter 14 Landscape and Visual of the ES [AS-079]** reports the findings on the potential impacts on the AONB. A further assessment of effects on special qualities of the AONB is being prepared in consultation with Natural England.

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Chilterns Society RR-0226	Flightpaths	The Society's main objection to the expansion of the airport is in relation to the likely increase in flights over the Chilterns AONB to the west of the airport. Whilst we note that the reconfiguration of flightpaths is not part of the current proposals, increased noise is an inevitable consequence of the proposed substantial increase in the number of passengers from 19 million to 32 million. This can only lead to a significant increase in flights over the Chilterns as they are so close to the end of the runway.? It would be the combination of increased flights from both Heathrow and London Luton that could have a significant impact on the tranquillity of the AONB and its enjoyment by residents and visitors.	As the Society identifies, airspace change is a separate process. One of the criteria applied by the CAA in determining the acceptability of any proposed airspace change is the impact on AONB's as set out in 'Air Navigation Guidance: Guidance on airspace & noise management and environmental objectives' (Ref 3) published by the Department for Transport. **Chapter 14 Landscape and Visual of the ES [AS-079]** considers tranquillity in that assessment of landscape effects and reports the conclusion of the assessment including effects on the Chilterns AONB from increased aircraft movements resulting from the Proposed Development using existing flightpaths. Cumulative effects are assessed and reported in **Chapter 21 In-combination and Cumulative Effects of the ES [AS-032]**.
Chilterns Society RR-0226	Flightpaths	We note the very significant opportunities that future airspace modernisation will present for allowing earlier and less constrained climb, and thus reducing noise impacts, and this is welcomed. Also, the opportunity should also be taken to amend routes to reduce overflight of the AONB, in	Noted.

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		the same way that potential adjustments to take flightpaths away from the population and to provide periods of respite are also being assessed.	
Chilterns Society RR-0226	Climate Change	Given the twin crises of climate change and nature loss, which are now acute, it is wrong to be expanding airport facilities into open countryside and encouraging more people to fly. Reducing aircraft use and less burning of fossil fuels are essential for the long-term future of the planet and to reaching the Government's target of Net Zero by 2050. Once this realisation sinks in, the government will be impelled to constrain levels of aviation activity through regulatory and fiscal measures, since any move towards alternative lower- or zero-carbon fuels is long-term and will only ever be partial. The sectors chiefly catered for by airports like Luton – mass low-cost and leisure travel, and private jets – are those which are likely to be most affected by pro-rata carbon taxes. This requires a fundamental shift in the business model away from continued expansion of passenger numbers. Effective government measures on climate change, combined with the alteration to people's travel	Government policy as set out in the Jet Zero Strategy is that there is no need to restrict growth in air transport demand to enable the Government's climate change targets to be met, albeit there will be higher costs associated with decarbonisation. These costs are taken into account in the demand forecasts for the Proposed Development as set out in the **Need Case [AS-125]**. Carbon emissions for aviation in the ES (**Chapter 12 Greenhouse Gases [APP-038]**) are modelled on the Jet Zero Strategy High Ambition scenario that represents current UK Government policy on aviation. The greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK ETS within the European Economic Area, and the global CORSIA. UK ETS sets an overall, scheme-wide cap on the amount of carbon which may be emitted by operators, including participating airlines. The available allowances place a cap on the total amount of GHG emissions that can be emitted

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		patterns triggered by the Covid pandemic and greater general environmental awareness, would thus render a forecast of 32 million passengers per annum highly doubtful.	by sectors, including aviation, covered by the UK ETS. This cap will be reduced over time stimulating innovation by participants to increase the carbon efficiency of their operations, or indeed to take steps which would reduce the overall scale of their operations. This effectively puts a binding cap on the amount of GHG emissions the aviation sector can emit. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050. CORSIA works alongside other measures to offset CO_2 emissions that cannot be reduced through the use of technological improvements, operational improvements, and SAF with emissions units from the carbon market. CORSIA aims to ensure that international aviation's net carbon emissions do not increase from 2020 levels. Participating airlines are required to monitor their emissions and report them to their respective national authorities. These authorities verify the reported emissions and ensure compliance with CORSIA regulations.

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			Currently the scheme is voluntary and serves as a pilot phase. From 2027 onward, all eligible international flights will be required to offset their emissions above the baseline level.
Chilterns Society RR-0226	Climate Change	Given the issues of climate change etc, no airport expansion should be considered until fossil-free fuels are much more developed.	Government policy as set out in the Jet Zero Strategy is that there is no need to restrict growth in air transport demand to enable the Government's climate change targets to be met.
Chilterns Society RR-0226	Need Case	The reasons for expanding the airport are based almost entirely on continuing economic growth. Unrestrained growth is not necessarily a good thing and can lead to greater discrepancies between different areas of the country. Continuing growth across the south east cannot be sustainable in the long term. The need case needs to recognise the importance of addressing climate change and ensuring a balanced approach to sustainability issues. We cannot continue to promote economic growth at the expense of everything else. Whilst we understand Luton's ambitions for growth, it should be tempered by the need to be in keeping with environmental imperatives and commensurate with developments in propulsion and	The growth projections for the Airport are based on the Government's national projections for economic growth. Consideration has also been given to the levelling up agenda, as explained in the **Need Case [AS-125]**, which highlights that Luton is an area in need of levelling up. Based on passenger numbers flying this summer, there is no indication that there have been permanent changes to the overall demand for air travel following the pandemic The 10 largest UK airports, including London Luton Airport, reported overall recovery of demand to 95% of 2019 levels in May 2023. This is on track for the market to have recovered to 2019 levels by 2024 as set out in the **Need Case [AS-125].**

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		construction technologies that effectively reduce dependency on, and use of, non-renewables. The Covid-19 pandemic has increased the number of people taking 'staycations' and has led to a boom in the use of online communication, thus negating the need for many overseas leisure and business trips. The economy needs to capitalise on these trends rather than trying to encourage increased air travel, with its significant impact on climate change. It should be a case of being smarter how we use the existing airport capacity, rather than planning a huge increase.	Overall, the Proposed Development is consistent with broader Government policy on meeting passenger demand for both business and leisure purposes as set out in '*Flightpath to the Future'* published by the Department for Transport in 2022 and other key policy documents such as 'Beyond the horizon: Making best use of existing runways' (Ref 4.
Chilterns Society RR-0226	Climate change	The application focusses on the economic and community benefits of developing the airport, but makes no mention of any benefits or disbenefits to the local environment or on addressing climate change, or to the local population. The proposal must embrace sustainability principles and make a positive contribution to achieving Net Zero by 2050.	An assessment of changes to greenhouse gases due to the Proposed Development is provided in the **Environmental Statement Chapter 12 Greenhouse Gases [APP-038].** An assessment of climate change resilience and potential climate change impacts is provided in **Chapter 9 Climate Change Resilience of the ES [APP-035**]. The UK government has set a legally binding target, under section 1 of the Climate Change Act 2008, to achieve net-zero greenhouse gas emissions by the year 2050 and to meet their 5-yearly carbon budgets (Ref 5).

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			It has introduced a range of measures to control carbon. For example, the Jet Zero Strategy is the government strategy on how aviation will contribute to meeting the UK's climate change commitments. Paragraph 3.57 sets out that "we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth". The applicant is aware that the rate of expansion of Luton airport is broadly similar to the Jet Zero Strategy High Ambition Scenario, which reinforces the view that the Application aligns with Government ambitions on carbon reduction. The effectiveness of aviation mitigation measures such as those described in the Jet Zero Strategy will be supported by market-based measures including the UK Emissions Trading Scheme (UK ETS) and Carbon Reduction Offsetting Scheme (CORSIA) acting as control mechanisms. The greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK ETS within the European Economic Area, and the global CORSIA.

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			UK ETS sets an overall, scheme-wide cap on the amount of carbon which may be emitted by operators, including participating airlines. The available allowances place a cap on the total amount of GHG emissions that can be emitted by sectors, including aviation, covered by the UK ETS. This cap will be reduced over time stimulating innovation by participants to increase the carbon efficiency of their operations, or indeed to take steps which would reduce the overall scale of their operations. This effectively puts a binding cap on the amount of GHG emissions the aviation sector can emit. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050. CORSIA works alongside other measures to offset CO_2 emissions that cannot be reduced through the use of technological improvements, operational improvements, and SAF with emissions units from the carbon market. CORSIA aims to ensure that international aviation's net carbon emissions do not increase from 2020 levels. Participating airlines are required to monitor their emissions

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			and report them to their respective national authorities. These authorities verify the reported emissions and ensure compliance with CORSIA regulations. Currently the scheme is voluntary and serves as a pilot phase. From 2027 onward, all eligible international flights will be required to offset their emissions above the baseline level
Chilterns Society RR-0226	Landscape and Visual	We are pleased that there have been some amendments since 2019 to reduce the environmental impacts of the proposals. The key ones from our perspective are retaining more habitat and landscape features in Wigmore Valley Park; reducing the scale of the earthworks required to bring the platform to the level of the runway; and reducing the footprint of the car parking. These changes are essential as the whole area around the airport could be proposed as a potential extension to the Chilterns AONB.	Noted. A description of the alternatives considered and design evolution is provided in **Chapter 3** of the ES **[AS-026]**.
Chilterns Society RR-0226	Design	The key ones from our perspective are retaining more habitat and landscape features in Wigmore Valley Park; reducing the scale of the earthworks required to bring the platform to the level of the	The draft Biodiversity and Landscape Management Plan and the Strategic Landscape Masterplan (SLMP) provide details on the proposals for Wigmore Valley Park including the Replacement Open Space and Mitigation proposals. Where feasible existing

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		runway; and reducing the footprint of the car parking.	vegetation is being retained and supplemented with new planting. As part of the scheme development the platform was reduced in size thereby reducing the associated earthworks requirements. This is described within Section 4.7 of the **Design and Access Statement Volume I [APP-207]**. The requirement for car parking is described in the **Transport Assessment [TR020001/APP/7.02]** and described within **Design and Access Statement Volume II [APP-208]** where the selection process for car parking locations is described and the key criteria considered, which includes avoiding sites which are key areas for the creation or retention or parkland. Both Multi Storey Car Parks and decked car parks are proposed along with block parking which help reduce the footprint required to provide the required number of spaces.
Chilterns Society RR-0226	Biodiversity	As well as this area being proposed to be 10% larger, it also needs to demonstrate through appropriate metrics that there would be at least a 10% Biodiversity Net	The Applicant is committed to deliver Biodiversity Net Gain, through extensive habitat provision and long term management.

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		Gain. There is a significant risk of a time lag between existing habitats being removed and new habitats becoming fully established. A long-term Management Plan needs to be developed and sufficient resources and management mechanisms put in place to ensure the long-term development of the new park.	Whilst it is still not mandatory for NSIPs such as the Proposed Development, the Applicant has set a voluntary ambition of achieving at least 10% BNG which is consistent with the ultimate intention of the Environment Act 2021. The Proposed Development achieves this as demonstrated by the BNG Report [APP-067] using the appropriate DEFRA metric. The OLBMP (**Appendix 8.2 of the ES [AS-029])** will ensure appropriate management of the habitats for 50 years with monitoring included to identify the need for adjustments to the management as required.
Chilterns Society RR-0226	Surface Access	The Society is concerned about the impacts of increased traffic to and from the airport and considers that this deserves greater emphasis. This would be both in terms of the construction of a viable network, which presumably will precede the airport expansion itself, and in terms of the resulting inevitable increase in surface traffic 24/7, and its impact on the environment, on noise, air and light pollution - largely predicated on private transport rather than the provision of an effective and sustainable public transport	As part of the DCO application the Applicant prepared a **Framework Travel Plan [AS-131]** and **Outline Transport Related Impacts Mitigation Monitoring Approach [APP-202]**. The Framework Travel Plan sets out a toolbox of measures which consists of interventions and measures that can be drawn upon and scaled up or down as and when required, in response to meeting the vision and objectives of the **Surface Access Strategy [APP-228]** and changing circumstances which will be recognised through the results of ongoing monitoring and stakeholder feedback. Future

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		system. The proposal of 45% of journeys being made by public transport by 2029, for example, is all very well, but it will need some positive incentives to change behaviour, otherwise it will be just wishful thinking.	Travel Plans that follow the structure and requirements set out in the Framework Travel Plan will have ambitious Targets that are over and above those set out in the **GCG Framework [APP-218]**, set in consultation with stakeholders. In order to meet these Targets a number of measures will need to be implemented, which could include improvements to local public transport services such as bus and rail. The airport operator is committed to funding these, as they have done in the recent past. Similarly, the OTRIMMA sets out a strategy for the development of the TRIMMA that will set out (a) monitoring the impact of airport-related traffic increases on defined sections of the public highway and (b) agreeing the need for and form of highway interventions to mitigate the impact of airport-related traffic increases. Highway mitigation will be monitored through the TRIMMA. All other modes will be monitored via the Travel Plans. With respect to the effect of traffic associated with the construction of the expanded airport, any impact on the area would be limited by the inclusion on the Construction Traffic Management Plan (CTMP) of designated routes for construction traffic. It is explained in

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			Section 4.2 of the **Outline CTMP [APP-130]** a principal consideration when identifying designated routes will be the minimisation of travel along any road that does not form part of the Primary Route Network (PRN).
Chilterns Society RR-0226	Landscape and Visual	The application and EIA do not sufficiently consider the expansion of the airport in relation to the Chilterns AONB. The AONB is a landscape designated as being of national importance. The applicant, as a statutory undertaker, has a duty to have regard to the purpose of conserving and enhancing the natural beauty of the AONB under Section 85 of the Countryside and Rights of Way Act 2000.??? Whilst the airport site is not located within the AONB, there is clearly a need for a much more detailed assessment of potential landscape impacts. The implications of potential extension of the AONB should also be addressed.	**ES Chapter 14 [APP-040]** reports the finding of a full assessment of Landscape and Visual Impacts. A further assessment of effects on special qualities of the AONB is being prepared in consultation with Natural England. The Applicant acknowledges the potential for a boundary variation/extension of the AONB. and that it does not confer any additional planning protection. A sensitivity test has been undertaken and this is reported in **ES Appendix 14.9 [APP-107]**.
Chilterns Society RR-0226	Climate Change	We welcome the intention of the airport to be zero carbon by 2050, but it is unclear how it is intended to achieve that. The use of energy efficient materials and solar panels is welcome, although the siting of	The Luton Airport Net Zero Roadmap has set an ambition to achieve net zero by 2040 for airport operation emissions. The Proposed Development currently includes solar car ports over car parks, along with an energy centre and battery storage facility. The Applicant is

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		the panels would need to be carefully considered.	continuing to explore further renewable energy opportunities on site or connected directly to the site, as stated in the **ES Appendix 4.3. Energy Statement [APP-050]**. It should be noted that achieving the airport operator's higher target, to increase the generation of renewable electricity to supply airport operational requirements to 50% by 2030, will need further projects to be considered that are not within the DCO application. The achievement of the net zero ambition will be assessed in line with required practice laid out in the UK Government's Jet Zero Strategy. The proposed approach to airport greenhouse gas emissions is set out in Section 3.4 of the **Green Controlled Growth Explanatory Note [APP-217]**. Furthermore, carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy High Ambition scenario that represents current UK Government policy on aviation. The greenhouse gas emissions from aviation at Luton airport will be managed and capped by

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			the UK ETS within the European Economic Area, and the global CORSIA. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050.
Chilterns Society RR-0226	Landscape and Visual	The proposals include new planting of trees and hedgerows both on and off site and this is welcomed to provide some mitigation for the harm to the Green Belt as a result of the terminal. We would expect the site to be surveyed in detail to ensure that if tree planting is undertaken if does not cause harm to any more important types of existing habitat. We would expect structural landscaping to be introduced rather than individual trees.? The development of the site should be landscape-led and should aim to reduce visual impacts, enhance landscape character where possible and create high quality wildlife sites and linking wildlife corridors. In particular, the landscaping of the new car park should be carefully designed to reduce its visual impact. With the car parking being sunk down due to spoil removal, there is an opportunity to create structural landscaping	The landscape design to date has been designed to mitigate landscape and visual effects as well as incorporate biodiversity mitigation. Extensive ecology and tree surveys have been undertaken as reported in **Appendix 8.1 [AS-033 and 034]** and **Appendix 14.3 [AS-085]**. The landscape mitigation described in ES Chapters 4 and 14, and the wider principles in the **Strategic Landscape Masterplan [APP-172]** will need to be developed and approved as a Requirement of the draft DCO.

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		around the edge to reduce its visibility from the surrounding area. The car park itself could also be broken up, where possible, by tree planting and other landscaping.	
Chilterns Society RR-0226	Lighting	Careful consideration should also be given to the quantity and design of lighting of the car park. Where possible, bollard lighting should be used rather than tall floodlighting to minimise light spillage into the surrounding area. Where floodlighting must be used it should be designed to point downwards and be shrouded to reduce light spillage into adjacent wildlife habitats.	The **Light Obtrusion Assessment [APP-052 and APP-053]** is based on a lighting strategy which includes lighting principles, in line with the latest design standards, that will be adopted into the detailed lighting design, including directional lighting. This commitment is also included in the Design Principles **[APP-225]** secured under Requirement 5 of the draft DCO **[AS-067]**.
Chilterns Society RR-0226	Biodiversity	The Society welcomes the commitment to target a 10% biodiversity net gain through the whole of the proposed development. This needs to be assessed using a nationally recognised methodology. However, it is important to ensure that the habitats of highest biodiversity are retained and not adversely affected, and particularly the County Wildlife Sites and ancient woodlands. Given the proximity of the Chilterns and the likely significant impacts on local communities, we would like to see a 20% biodiversity net gain.	The BNG Calculations within the Biodiversity Net Gain Report which forms **Appendix 8.5 of the ES [APP-067]** are based on the nationally recognised methodology of Defra Metric 3.1. Whilst it is still not mandatory for NSIPs such as the Proposed Development, the Applicant has set a voluntary ambition of achieving at least 10% BNG which is consistent with the ultimate intention of the Environment Act 2021. As such, it is considered that the Applicant's ambition of achieving 10% BNG is proportionate.

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			All ancient woodlands are retained, however County Wildlife Sites such as Wigmore Park CWS are unavoidably affected, however the embedded mitigation and additional habitat creation adequately mitigates this effect.
Chilterns Society RR-0226	Landscape and Visual	The Chilterns is an important area for quiet informal recreation, including the Chilterns Way, the Chilterns Cycleway and the North Chilterns Trail. Impacts on these in terms of inter-visibility and disturbance will also be important considerations in designing the scheme.	Effects on users of public rights of way are reported in **ES Chapters 13 and 14 [APP-039 and 040]**.
Chilterns Society RR-0226	Surface Access	Further consideration needs to be given to potential impacts of increased traffic and additional road infrastructure on the Chilterns AONB and the open Chilterns countryside surrounding the airport. Whilst it is proposed that 45% of journeys will be made by public transport from 2029, there will still be a major increase in traffic in the local area because of a large increase in the number of passengers and the creation of larger car parks with an additional 7,750 parking spaces.	The Applicant has undertaken reporting on the forecast traffic flows and associated effects in the **Transport Assessment [APP-203 to APP-206]**. A means of monitoring traffic flows on the public highway is in development and will be reported on in due course.

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Chilterns Society RR-0226	Air Quality	The air quality section deals with impacts of the airport itself but fails to assess the impact of many thousands of flights arriving and departing each year. Our view is that this cannot be treated separately to the airport itself.	The air quality assessment reported in **ES Chapter 7 [AS-076]** clearly includes aircraft emissions as defined in Section 7.3 Scope of Assessment under 'Matters scoped in' at paragraph 7.3.21.
Chilterns Society RR-0226	Landscape and Visual	In terms of biodiversity, we are pleased to see a commitment to preparing a Landscape and Biodiversity Management Plan.	Noted.
Chilterns Society RR-0226	Need Case	We note that changes to flightpaths, and terminal expansion (and ancillary work), as proposed here, are two independent processes. However, it is not acceptable to say that the airport will be net zero if the impacts of the flights are not considered. As far as we can see, although it is not clear, Luton Rising are not proposing any more flights than currently theoretically possible or allowed (or at least not significantly so), but just assuming a greater proportion are commercial flights (rather than business jets carrying one or two people, which fill a proportion of the slots, and have formed quite a big segment of Luton movements at times, although are gradually getting squeezed out to smaller	As set out in the **Need Case [AS-125]**, there is projected to be growth in commercial aircraft movements, with existing levels of business aviation activity remaining roughly constant. The demand forecasts have been developed consistent with the Government's Jet Zero Strategy and take into account the measures necessary to meet the Government's decarbonisation targets for aviation. The expected daily profiles of aircraft movement demand are illustrated in Figure 6.20-6.22 of the Need Case. The seasonal profile of demand is shown in Figure 6.16. Whilst the airport will get busier, it is still expected that summer will be busier than winter.

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		airfields such as Farnborough, Biggin Hill and even places like Oxford); and that these commercial flights will also tend to use bigger aircraft than now; hence more terminal space, car-parking, etc. required. In practice, we understand the runway is not currently operating at 100% capacity; and because the business jet movements are very ad hoc and variable, there tend to be quiet and busy days in terms of the number of aircraft movements. Commercial flights, by contrast, tend to operate on a regular schedule, so the slots they secure will tend to be used on a daily or near-daily basis across a season. So, if Luton's growth predictions come true, and the number and proportion of commercial flights grows; and the terminals are big enough to accommodate the extra passengers; then there will in actuality be more flights than now. And, probably every day will be similarly busy.	
Chilterns Society RR-0226	Noise and Vibration	On the whole, commercial jets are a bit noisier than business jets, but not vastly so. But, if the low-cost airlines that dominate Luton continue their trend to more modern and larger aircraft, these newer generation aircraft (A321 Neos, and 737Max) are	Although new generation aircraft currently coming into service are quieter than the current generation aircraft, the proposed expansion will result in an intensification of aircraft movements along existing flight paths over the Chiltern AONB. An assessment of

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		actually a little quieter than older generation commercial aircraft. Either way, aircraft noise will continue to be a key issue for the AONB and the area surrounding the airport. Because aircraft routes won't change as a direct consequence of these proposals, it will be essentially the same people as now that will experience the noise, and at the same heights and thus volume – but there will be more of them.	how the intensification of aircraft movements will affect the Chilterns AONB has been undertaken in ES Chapter 14; **Landscape and Visual [AS-079]** and significant effects reported where identified. This includes consideration of noise and tranquillity. All reasonably practicable measures have been explored to reduce noise impacts from the Proposed Development. Further details can be found in **Chapter 16 Noise and Vibration [AS-080]** and **Appendix 16.2 Operational Noise Management (Explanatory Note)** of the ES **[APP-111].**
Chilterns Society RR-0226	Flightpaths and fleet mix	However, one less obvious consequence of traffic levels increasing, and getting closer to runway capacity, is that there is less scope for short-cuts and expedited climbs, and flows get more regimented – so less "random" scatter of flight paths and noise. The current aircraft routes from Luton are largely determined and built around those from Heathrow, plus Stansted, Northolt etc. in a very complex area of airspace. These have been long recognised as ripe for revision, as old-fashioned, and based on old technology and sluggish performance of older aircraft, and there have been a couple of aborted efforts to revise them.	Aircraft operations now and in future will need to adhere to the defined structure of flightpaths. The increased runway movement rate, as a consequence of the Proposed Development will not, of itself, reduce the scope for short cuts or expedited climbs when broader air traffic control circumstances permit. It is recognised that the Government has set in train a process of airspace modernisation to improve the performance of airspace in and around the London area (known as FASI-S).

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		This is still very much a live issue, and any revision that is likely to allow for faster climbs, and a resultant reduction in noise would be welcome. However, this would inevitably also bring aircraft over different areas, some currently unaffected.	This is governed by a separate process overseen by the Civil Aviation Authority and with its own consultation processes. The aim is to both improve the efficiency and capacity of the airspace as well as to reduce the environmental impact on communities on the ground.
Chilterns Society RR-0226	Flightpath Landscape and Visual	We note that new arrival routes for Luton (designed to reduce conflicts with Stansted arriving and departing aircraft) came in during February 2022. These create a new holding stack, just for Luton, further north, and will lead to a subtle redistribution of arriving traffic, possibly reducing impacts on the north-eastern corner of the AONB. However, it will depend how many aircraft will follow the whole route, or if short-cutting as now is still employed a lot of the time. Until the review of flightpaths is undertaken it is not possible to demonstrate what the impact would be on the AONB. This would need to be addressed through a detailed Environmental Impact Assessment. It is essential that the physical expansion of the airport and the changes to flightpaths are undertaken together.	As noted in an earlier response, the process for airspace change is separate from the DCO process. There will, in due course, be a review of the impact of the changes to the arrival routes that came into force last February.

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Chilterns Society RR-0226	Flightpaths	The Society would continue to object to the proposals unless it can be demonstrated that noise and disturbance within the AONB can be reduced by careful management of flightpaths and climbing gradients. We note from the consultation that it is proposed to maintain a restriction on night flights, and this is welcomed. However, the number of night flights is still very high.	The noise impacts have been assessed based on the current flight paths to be conservative. It is expected that the airspace modernisation process will provide opportunities to reduce the noise impacts further in future.
Chilterns Society RR-0226	Water, drainage, and Flood risk	The airport is in the catchment of the River Mimram. This is one of the important chalk streams of the Chilterns, which is particularly susceptible to reduced flows and increased water pollution. In devising the drainage for the scheme, we ask that the needs of the chalk stream are specifically addressed in the Environmental Impact Assessment.	The drainage design has considered catchments and run off and proposed appropriate containment and treatment as described in the Drainage Design Statement (**ES Appendix 20.4 [APP-137]**). The impact on water resources including groundwater and rivers is reported in ES Chapter 20 **Water Resources and Flood Risk [AS-031]**.
Chilterns Society RR-0226	Green Controlled Growth	Green Controlled Growth - We are pleased to see an enhanced and more structured approach to addressing environmental impacts. However, it is essential that the impacts of the flights from the airport are considered as well as the operation of the airport itself. This is particularly important in relation to assessing greenhouse gas emissions as a result of thousands of flights	The support for Green Controlled Growth is noted and welcomed. The **Green Controlled Growth Framework [APP-218]** includes Limits on aircraft noise. This is explained in more detail in Section 3.2 of the **Green Controlled Growth Explanatory Note [APP-217]**.

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		per year, and the noise impacts on the area immediately around the airport, including the Chilterns AONB. Also, we would have expected the GCG to include measuring the success of biodiversity enhancements through Biodiversity Net Gain.	The proposed approach to greenhouse gas emissions in Green Controlled Growth is set out in Section 3.4 of the Green Controlled Growth Explanatory Note. Careful consideration has been given to the approach to Scope 3 aviation emissions in the context of government policy, including the Jet Zero Strategy and the Aviation Strategy: Making Best Use policy ('MBU') (Ref 6). MBU highlights that climate change issues are embedded in, and controlled by, national decision-making. This position on aviation emissions was previously tested and accepted as part of planning appeals for both Bristol Airport and Stansted Airport. National policy for the mitigation of aviation associated emissions is outlined in the Jet Zero Strategy. This strategy states that there is no need to restrict growth in air transport demand to enable the Government's climate change targets to be met. Given this position, it is not considered appropriate for these emissions to be controlled through the GCG Framework, and

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			instead action to address carbon emissions from aviation should take place at a national level. However, actions to address aviation emissions through supporting these measures have been outlined in the Environmental Statement **Appendix 12.1 Outline Greenhouse Gas Action Plan [APP-081],** including operating policy/strategy to encourage uptake of more efficient aircraft and SAFs, as well as the provision of infrastructure to allow aircraft refuelling with SAFs by 2030. Biodiversity has not been included within the scope of Green Controlled Growth as it is not directly correlated with the growth of the airport and is instead a function of the design and construction of the Proposed Development. Nevertheless, the **Outline Landscape and Biodiversity Management Plan** included as **Appendix 8.2 of the Environmental Statement [AS-029]** will ensure appropriate management of habitats for 50 years with monitoring included to identify the need for adjustments to the management as required.

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Chilterns Society RR-0226	Biodiversity and GCG	Nature is in crisis, so it essential that major enhancement projects like the new Wigmore Valley Park are successful in replacing habitats lost and creating environmental and leisure benefits for the future. It is essential that as much as possible of the existing park is retained and that the resulting new area of park is at least 10% larger than the existing park. As the park is developed, we would expect more ambitious targets to be developed and implemented through a comprehensive Landscape and Biodiversity Management Plan. GCG should provide a driver for this.	The provision of open space (47.6ha) is provided as part of the robust design of the Proposed Development and therefore is included as embedded mitigation. This includes replacement habitat for Wigmore Park CWS (15.4ha). Additional mitigation provided includes the habitat creation area (over 43ha). The OLBMP (**Appendix 8.2 of the ES [AS-029])** will ensure appropriate management of the habitats for 50 years with monitoring included to identify the need for adjustments to the management as required. Biodiversity has not been included within the scope of Green Controlled Growth it is not directly correlated with the growth of the airport and is instead a function of the design and construction of the Proposed Development.
Chilterns Society RR-0226	Landscape and Visual	Impacts on open space - The Airport is located immediately adjacent to the Green Belt along both the eastern and southern boundaries. New buildings in this area should be kept to an absolute minimum. The proposals would locate a new terminal, additional commercial development and car parking to the north of the runway,	Structures in the Greenbelt have been kept to a minimum and only include essential works such as the surface movement radar and connection to a fuel pipeline which runs underground in the Greenbelt. The Applicant is fully aware of the importance of Wigmore Valley Park. The development of the design has minimised the area lost as much as

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		immediately adjacent to the existing airport development. This would lead to the loss of Wigmore Valley Park and lead to a significant incursion into open countryside, including part of the Green Belt to the east of the North Hertfordshire boundary. Wigmore Valley Park is a significant area of public open space, which provides an important recreational space for use by local residents. It was developed from a former waste site and has been identified by Luton Borough Council in their Local Plan as both an Area of Local Landscape Value and a County Wildlife Site.	possible, and includes replacement open space (equivalent to a 10% increase in area) and habitats. Open space is a suitable land use within the Greenbelt (see **Appendix B Green Belt Assessment of the Planning Statement [APP-196]).**
Chilterns Society RR-0226	Landscape and Visual	The Society's view is that the loss of Wigmore Valley Park is unacceptable due to landscape and wildlife impacts. It is clear from visiting the site that to build up the land in the park to create an apron and taxiway that are on a level with the runway would require a significant amount of soil to be removed from the existing Wigmore Valley Park, creating a major change to the landform in this area. We understand that this volume has been reduced by 50%, but the resulting impact would still be significant and harmful to existing open space, landscape and biodiversity.	The Society's view is noted. Impacts on Wigmore Valley Park have been assessed and appropriate mitigation proposed as reported in the Environmental Statement **(Chapter 14 Landscape and Visual [AS-079]).**

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Chilterns Society RR-0226	Landscape and Visual	The proposed car park would be created in the area where the spoil has been removed and the excavations would extend into the existing Green Belt. Whilst we are pleased that the likely fencing and floodlighting would be outside the Green Belt, there is potential for this to have a negative impact on adjacent open countryside.	Whilst excavation does extend into the Green Belt, this is a temporary impact as the excavated areas in the Green Belt will be re-instated as part of the landscape restoration works after material has been removed and not be permanent infrastructure. The impact of the Proposed Development has been assessed and reported in the **Green Belt Assessment Appendix B of the Planning Statement [APP-196]).**
Chilterns Society RR-0226	Green Belt and Open Space	Whilst the addition of a new park in the Green Belt to compensate for the loss of Wigmore Valley Park would not be unacceptable in terms of openness of the Green Belt, we do not consider that it could provide an adequate replacement for the existing park and associated County Wildlife Site over a reasonable period of time. The new park would also be located close to the approach to the main runway, so would suffer excessive noise and disturbance, as well as air quality issues, due to planes landing and taking off.	The replacement open space and habitats included in the Proposed Development have been designed to more than adequately replace the partial loss of the existing park in terms of area, quality, accessibility and biodiversity. The park would be created before the existing park is lost and managed for 50 years as defined in the **Outline Landscape and Biodiversity Management Plan [AS-029]**. Whilst some restoration and habitat areas may be closer to the aircraft approach, the proposed replacement open space is not closer than the park lost.
Chilterns Society RR-0226	Wigmore Valley Park and Open Space	It would also be located further away from local housing areas, reducing its convenience as an open space and possibly encouraging increased car use.	The existing entrance to the car park and northern part of the park will remain as existing. As described in **Chapter 4 Proposed Development of the ES [AS-074]** and

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		Our view is that the phasing of the development must be such that the new area of parkland is created before the main airport works commence. This would maintain a continuity of public open space as well as allowing the parkland landscape more time to establish.	Appendix 4.1 **Construction Method Statement and Programme Report of the ES [AS-082]**, the replacement open space will be provided in Phase 1 before works commence in the existing park.
Chilterns Society RR-0226	Planning	The adopted Luton Borough Plan shows an employment development site to the east of Wigmore Valley Park. This is not shown on the proposals, and we are concerned that the expansion of the airport would lead to increased pressure to develop employment uses within the Green Belt to the east of the North Hertfordshire boundary. It is also unclear from the plans how the development of the airport would relate to the proposed development of New Century Park and the cumulative impact on the local landscape and biodiversity.	The designated employment areas are not shown on submitted plans as they do not relate to the Proposed Development in this instance. Furthermore, should any proposals to develop employment uses within the Green Belt come forward, they would be subject to a separate planning application - to be considered on its own merits. With regards to New Century Park, now known as Green Horizons Park, in terms of wider development and potential effects, a cumulative assessment has been undertaken for the purposes of EIA and is provided within ES Chapter 21 **Cumulative Effects Assessment [AS-032]**.
Chilterns Society RR-0226	Need Case	The Society finds it absolutely incredible that anyone (government, airport operators, economic bodies, councils) can contemplate unrestrained (or indeed any)	This appears to be a comment on broader Government policy on aviation. The Proposed Development is in accordance with these

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		growth in aviation, and think it is compatible with addressing the climate emergency; and thus represent it as a good thing. Whatever the truth of the claims about economic benefits and jobs growth, we do not agree with the assessment that all growth and all jobs are "good" and equivalent, regardless of what damage they do. The risk is that it is a self-fulfilling prophecy, with more airport capacity triggering more flights, just like building roads.	policies, in particular the policy that airports should make best use of existing runways.
Chilterns Society RR-0226	Landscape and Visual	the Chiltern Society is opposed to any expansion of Luton Airport which involves new terminal facilities or a significant increase in flights due to anticipated unacceptable impacts on the Green Belt, open countryside and the Chilterns AONB.	Noted. The environmental impacts of the Proposed Development on the AONB are assessed and reported in the Environmental Statement Chapter 14; **Landscape and Visual [AS-079]**. A **Green Belt Assessment** is provided as **Appendix B to the Planning Statement [APP-196]**.

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Clarion Housing Group RR-0267	Air Quality Noise Health	Clarion Housing Group own around 1,300 homes in Luton as well as in Whitwell and Hitchen. We have identified that the majority of these homes are in close proximity to the new runway and will be impacted by the airport expansion through lower air quality and increased noise pollution. Planes take off and land both ways, sometimes even in diagonal according to wind, weather and local pressure, so it will impact the properties in all directions. Air quality - The expansion at Luton airport will result in an increase in road traffic from passenger, freight and other activity in the area which will contribute to a degradation in air quality, particularly NO2, this is alongside an increase from the aircrafts themselves. The associated health impacts of poor air quality are increased risks of developing heart and respiratory diseases and longer term exposure to high levels of NO2 can affect lung function in children and babies. Noise pollution The construction of the additional runway in Luton will generate significant noise pollution impacts, these will be superseded by the noise impact of aircrafts once the work is completed. The British	**Chapter 7 Air Quality [APP-034]** of the Environmental Statement (ES) has provided an assessment of air quality in Luton, Whitwell and Hitchin following the methodology agreed with the local councils. No significant impacts are predicted to occur. **Appendix 7.5 Outline Operational Air Quality Plan [APP-065]** sets out the measures committed to via the DCO which will help to improve air quality. Firstly, it should be noted that there is no new runway proposed and the expansion would use existing flight paths. For departures, the flight paths are defined by Noise Preferential Routes, which aircraft must stay within up to 4,000 feet. For arrivals, aircraft join the final approach in alignment with the runway at a distance of approximately 10 km. Aircraft operate either easterly or westerly depending on prevailing weather conditions. The impact of noise (day and night) due to increased vehicular and aircraft movements from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in

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		Medical Journal (BMJ) carried out a study into the mental and physical impacts of aircraft noise which stated that increased exposure to aeroplane noise was associated with a significant increase in insomnia, increased risks of cardiovascular disease alongside mental health admissions to hospital.	**Chapter 16 Noise and Vibration [AS-080]** of the ES. A quantitative assessment of health outcomes associated with aircraft noise has been undertaken and is presented in **Chapter 13 Health and Community [APP-039]** of the **ES.** The methodology for the assessment is based on the latest guidance and best practice from the Department for the Environment, Food and Rural Affairs and the World Health Organisation, and is set out in **Appendix 13.4 Methodology for Health and Community Assessment [APP-086]** of the **ES.** Evidence from the British Medical Journal was considered as part of the evidence review, as set out in **Appendix 13.5 Evidence Review for Health Assessment [AS-084]** of the **ES.**
Clarion Housing Group RR-0267	Compensation	Clarion Housing Group own around 1,300 homes in Luton as well as in Whitwell and Hitchen. We have identified that the majority of these homes are in close proximity to the new runway and will be impacted by the airport expansion through lower air quality and increased noise pollution. Planes take off and land both ways, sometimes even in diagonal according to wind, weather and local pressure, so it will impact the properties in	There is no proposal to open a new runway as part of the Proposed Development, although use of the existing runway will intensify. The application for development consent includes a scheme to provide noise insulation mitigation works on properties most affected by the proposals. The scheme is industry leading and the details are set out in the **Draft Compensation Policies Measures and Community First [AS-128].**

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		all directions. We also believe the value of our homes may be decreased by this project.	Owners who think the value of their property has decreased are protected by a statutory right to claim compensation for diminution in value provided under Part I of the Land Compensation Act 1973.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	General	The joint CPREs continue to strongly oppose the proposal to expand Luton Airport from 18 million to 32 million passengers per annum. Our objections are based on matters of both principle and detailed points of concern as noted in the remainder of this submission. 1.4 CPRE Hertfordshire was a Rule 6 party to the planning inquiry for the variation of conditions on which a decision has not been made. Their submission covered many similar issues which are directly relevant to this determination.	The Proposed Development is being brought forward in the context of Government policy which supports airports making best use of their runways because of the economic benefits of air transport, as set out in the **Need Case [AS-125]**. The airport is central to the local economy and is an important connectivity asset for the broader region it serves, including the Oxford-Cambridge Arc. It also supports regeneration and levelling up in Luton and neighbouring areas, where levels of deprivation are above average. To maintain its connectivity and significance across the economic region, the airport must address its capacity constraints. Without additional capacity the airport will not be able to accommodate any further growth in demand in the future. This would limit its ability to support wider economic growth across the sub-region.

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			The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport. As such, it has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the **GCG Explanatory Note [APP-217]** submitted as part of this application for development consent. Note that the application to vary conditions is being progressed by the airport operator, LLAOL and does not relate to the current DCO application.
CPRE Bedfordshire - The Countryside Charity	Design GCG	1.5 There is no substantive difference between the present and the previous 2022 and 2019 proposals despite Luton Rising's assertions that significant changes have been made. In essence, the scale of the	The options considered, and evolution of the design of the Proposed Development is described in **Chapter 3 Alternatives and Design Evolution [AS-026]** of the Environmental Statement (ES) **and the**

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RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290		expansion proposals and their impacts are similar and have in fact become more damaging with the changing circumstances.	**Design and Access Statement [AS-049]** and **[APP-208]**. The environmental effects of the Proposed Development at each statutory consultation stage and the application are reported in the 2019 Preliminary Environmental Information Report (PEIR), 2022 PEIR, and the ES.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Climate Change	1.6 In these times of Global Climate Change and Climate Emergency it is inconceivable that such an environmentally damaging and purely profit driven proposal should be even seriously considered.	Greenhouse gas emissions have been assessed and reported in **Chapter 12 Greenhouse Gases [APP-038]** of the Environmental Statement (ES). Carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy High Ambition scenario that represents current UK Government policy on aviation.
CPRE Bedfordshire - The Countryside Charity	Landscape & Visual	1.7 Our main areas of concern are: - Landscape and countryside: The proposals will result in significant and irreversible harm to the immediate countryside and beyond. This includes the Chilterns AONB	An assessment of landscape and visual impacts has been undertaken and reported in **Chapter 14 Landscape and Visual [APP-040]** of the Environmental Statement (ES); including effect on the Chilterns AONB. Where

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RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290		and the Green Belt. In addition, there will be a loss of open space and recreational areas and irreparable damage to Wigmore Park.	significant effects have been identified, mitigation has been provided where practicable. This mitigation includes replacement open space and habitats for that lost from the park. A Green Belt assessment is provided as **Appendix B Green Belt Assessment [APP-196]** the **Planning Statement [APP-194]**.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Landscape and Visual Design	The increased apron, car parking and airport activity will bring additional light pollution to a wide area of countryside.	A lighting assessment has been undertaken to assess impacts as a result of external artificial lighting for the Main Application Site and details mitigation measures. Refer to **Appendix 5.2 Light Obtrusion Assessment – Part A [APP-052]** and **Part B [APP-053]** of the Environmental Statement.
CPRE Bedfordshire - The Countryside Charity	Climate Change Resilience	Climate Emergency: The proposals flagrantly ignore the reality of the Climate Emergency and the impacts of rapidly expanding aviation, the fastest growing source of Green House Gas (GHG)	Greenhouse gas emissions have been assessed and reported in **Chapter 12 Greenhouse Gases [APP-038]** of the Environmental Statement (ES). Carbon emissions for aviation in the ES are modelled

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RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290		emissions. A 60% increase in flights will result in hugely increased emissions and there is no guarantee that these can be reduced to meet the Government's commitments.	on the Jet Zero Strategy High Ambition scenario that represents current UK Government policy on aviation.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Noise and Vibration Air Quality	Noise and Air Pollution: The expansion will cause substantive and further harm to the surrounding countryside and towns by increased noise and air pollution. Further adverse noise impacts are inevitable and underestimated in the submission documents.	**Chapter 7 Air Quality [APP-034]** of the Environmental Statement (ES) has provided an assessment of air quality in Bedfordshire and Hertfordshire following the methodology agreed with the local Councils. No significant impacts are predicted to occur. **Appendix 7.5 Outline Operational Air Quality Plan [APP-065]** sets out the measures committed to via the DCO which will help to improve air quality. The impact of noise (day and night) due to increased vehicular and aircraft movements from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in

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			Chapter 16 Noise and Vibration [AS-080] of the ES.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Surface Access	Traffic: Significant congestion will be caused by increases in traffic at the site and on approach roads. More road building is proposed, as well as the provision of an additional 7,275 parking spaces. The effects on the local road network are greatly underestimated. The whole approach lacks the required emphasis on sustainable transport and detail of how a significant modal shift to public transport will be achieved.	The Applicant has undertaken reporting on the forecast traffic flows and associated effects - as well as the proposed means of ensuring modal shift - in the **Transport Assessment [APP-203 to APP-206]**. A means of monitoring traffic flows on the public highway is in development and will be reported on in due course.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the	Forecasts Economics	Economic Forecasts: The economic benefits of the scheme are greatly overestimated and do not justify the harm.	The economic benefits of the scheme are clearly assessed using standard accepted techniques and approaches as reported in the **Need Case [AS-125]** and **Chapter 11 Economics and Employment [APP-037]** of the Environmental Statement. They are considered robust.

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Countryside Charity RR-0290			
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Health and community	2.5 Paragraph 185 states: "Planning … decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or wider area to impacts that could arise from the development	An Environmental Impact Assessment (EIA) has been undertaken in accordance with the applicable EIA Regulations and the conclusions are reported in the Environmental Statement (ES) submitted with the application for development consent. The effects of the Proposed Development on the health and wellbeing of the local population have been assessed and all reasonably practicable measures have been explored to reduce adverse effects and improve health outcomes. The embedded mitigation, assessment of effects and additional mitigation measures are described in **Chapter 13 Health and Community [APP-039]** of the ES. Therefore, the likely effects (including cumulative effects) on health, and the natural environment, as well as the potential sensitivity of the site or wider area can be considered in planning decisions.
CPRE Bedfordshire - The Countryside Charity	Noise and Vibration	In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse effects on health and quality of life b) identify and protect tranquil	The impact of noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16**

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RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290		areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason."	**Noise and Vibration of the Environmental Statement [AS-080]**. The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) contains legally binding daytime and night-time noise contour area Limits. The Applicant has also substantially extended its noise insulation scheme, including the addition of schemes which will provide the full cost of insulation for habitable rooms in eligible properties exposed above the daytime and night-time Significant Observed Adverse Effect Level (SOAEL). See **Draft Compensation Policies Measures and Community First [AS-128]** for further details. As described in the **Planning Statement [AS-122],** the compensatory mitigation measures for the Proposed Development (**Draft Compensation Policies Measures and Community First [AS-128]**) have been developed so that in combination with the embedded noise management measures as secured by the Noise Envelope within the **Green Controlled Growth framework [APP-218]**, they comply with policy requirements to avoid significant adverse effects from noise

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			and to mitigate and reduce to a minimum adverse effects of noise. The approach to the assessment of noise and tranquillity in line with the National Planning Policy Framework (Ref 7) is set out in Section 16.5 of **Chapter 16 of the Environmental Statement (ES) [AS-080]**.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Planning	2.6 In addition, Luton's adopted Local Plan policy LLP6 – London Luton Airport Strategic Allocation, under the heading 'Airport Expansion' states: 2.7 "Proposals for development will only be supported where the following criteria are met; ... iv. they fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or the local environment (in terms of noise, disturbance, air quality and climate change impacts) … v. achieve further noise reduction or no material increase in day or night time noise or otherwise cause excessive noise including ground noise at any time in the day or night and in accordance with the airport's most recent Airport Noise Action Plan."	The impacts of any increase in Air Transport Movements on surrounding occupiers and/or the local environment are fully assessed in **Chapter 16 Noise and Vibration [AS-080]**, **Chapter 17 Air Quality [APP-034]** and **Chapter 9 Climate Change Resilience [APP-035]** of the Environmental Statement. With regard to part v. of Policy LLP6, **Chapter 16 Noise and Vibration [AS-080]** of the ES confirms how the combination of the secured Noise Envelope and Noise Insulation policy will: • limit and reduce the number of people significantly affected; • mitigate and minimise any long-term adverse effects of noise on health and quality of life;

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			• avoid significant effects; • prevent unacceptable levels of noise; and • share the noise benefits of future technology.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Landscape and Visual	2.8 The Chilterns AONB lies less than three miles from Luton Airport and the AONB and its setting lie underneath the final approach to the runway. Natural England's current Designations Programme, announced in June 2021 includes a proposal to extend the designated area of the Chilterns AONB to include land to the south and east of Luton in the vicinity of the airport. 2.9 The recently adopted North Herts Local Plan also designates a new area of Green Belt west of Stevenage which lies beneath the approach to the Luton Airport runway. 2.10 Para 14.3.1 and 14.3.2 of the applicants Environmental Statement chapter 14 states very clearly that: - "The Proposed Development would impact on the existing landscape character during both construction and operation" and "The increase in aircraft movements is also assessed to result in a significant adverse effect on the aesthetic and perceptual characteristics of the landscape within the	**Chapter 14 Landscape and Visual [APP-040]** of the Environmental Statement reports the finding of a full assessment of landscape and visual impacts undertaken in accordance with the EIA scoping report and opinion and in relevant policy and legislation, including tranquillity and the AONB. Effects on the aesthetic or perceptual characteristics of the landscape within the Chilterns AONB are assessed in **Appendix 14.4 [AS-086] of the ES** where it is concluded that the Proposed Development would have a minor adverse effect during Phase 1 and 2a, increasing to a moderate adverse effect during Phase 2b. The Operation effects are assessed to be moderate adverse. An assessment of the effects on the special qualities of the Chilterns AONB is being prepared in consultation with Natural England and will be submitted during the Examination. In addition, the Applicant acknowledges the proposed search area is one of the options

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		Chilterns AONB. 2.11 A key requirement of national planning policy regarding designated protected areas is the expectation of tranquil enjoyment, as noted above. In addition to noise impacts, there is significant visual intrusion of aircraft, often several visible at once from the AONB and its setting. The combination of aural and visual intrusion and associated sense of activity deprives much of the AONB of the sense of tranquillity which it deserves as a nationally protected area. 2.12 The proposals therefore contravene both National policy and Local Plan Policy LLP6 with regard to the impacts on rural settlements and the local environment.	considered for a boundary variation/extension of the AONB and that it does not confer any additional planning protection. However, a sensitivity test has been undertaken and likely changes to assessment conclusions, should this area gain the additional planning protection as an extension of the AONB, are reported in **Appendix 14.9 Chilterns AONB Sensitivity Test [APP-107]**.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the	Wigmore Valley Park	Wigmore Park 2.13 The joint CPREs object to the inclusion of Wigmore Park in the development. Wigmore Park as an open space was gifted to local residents in compensation for the loss of green space to residential building. 2.14 It is a long-established park and nature reserve and has evolved into an integrated and mature habitat, with a developing and varied ecology including thousands of	The Applicant is fully aware importance of Wigmore Valley Park and the development of the design has prioritised design principles to retain, protect and enhance landscape and biodiversity, and minimise the area lost (see Strategic landscape Masterplan of the ES [APP-172]). The park has been extensively surveyed and characterised regarding its biodiversity as reported in **Appendix 8.1 Ecology Baseline Report [AS-033 and AS-034]**.

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Countryside Charity RR-0290		orchids, bees, butterflies and over 60 bird species. Wigmore Park has achieved County Wildlife Site status, received public recognition and awards and is listed as an Asset of Community Value. 2.15 The Park enjoys wide support as a popular and much-loved recreational space for the local community and acts as a noise, pollution and visual buffer between the eastern end of the Airport runway and the residential area less than a mile to the north. It deserves special treatment as an Asset of Community Value and as a buffer to Airport operations. 2.16 The Park is an important element of the commitments made in the Luton Local Plan to mitigate and reduce over time the noise and amenity impacts of the Airport. Notwithstanding concerns relating to the nature of the relationship between Luton Council and Luton Rising which have been raised previously by others, the proposals to 'replace' the area intended for use by the Airport with additional land are both inadequate and inappropriate. 2.17 The replacement land does not make up for the loss of a mature, ecologically rich and highly valued landscape. The new area	The Proposed Development includes replacement open space (equivalent to a 10% increase in area), which will be of equal quality to space lost. The proposals have been developed to improve accessibility and accords with applicable policy. In addition to biodiversity provision in the replacement open space, extensive habitat creation is provided to achieve at least 10% biodiversity new gain. Both open space and habitat will be placed in trust and managed as described in the **Outline Landscape and Biodiversity Management Plan [AS-029]**.

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		will take years to mature, would no longer be located within easy access of residents and would not act as the buffer to the airport as originally intended. We strongly oppose the inclusion of Wigmore Park and destruction of this important and unique green area and habitats.	
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Climate Change Resilience	3. Climate emergency 3.1 The expansion proposals and Needs Case flagrantly ignore the reality of the climate emergency and the impacts of rapidly expanding aviation, the fastest growing source of green-house gas (GHG) emissions. The joint CPREs are concerned that an increase in capacity for Luton Airport is inappropriate in terms of the increasing debate on the future of air travel, and its continued expansion. 3.2 Notwithstanding the technical advances with regard to noise and fuel economy, these will not be sufficient to ameliorate the damage caused by planned increases in air travel. The work of the Intergovernmental Panel on Climate Change (IPCC) in 2018 underlined how, despite current efforts, we are on course for more than two degrees Centigrade warming above pre-industrial	Greenhouse gas emissions have been assessed and reported in **Chapter 12 Greenhouse Gases [APP-038]** of the Environmental Statement (ES). Carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy High Ambition scenario (Ref 1) that represents current UK Government policy on aviation.

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		levels and the catastrophic consequences this would entail. 3.3 The IPCC highlighted an urgent need to halve GHG emissions within the next ten years and the UK Parliament and many local councils, including those of Bedfordshire and Hertfordshire have declared climate emergencies. The UK Government has adopted a zero-carbon target for emissions by 2050 with many proposals by political and environmental organisations, including CPRE, for this to the accelerated. The UK Government recognised in their Jet Zero strategy document 2022 that "At current rates, aviation is expected to become one of the largest emitting sectors by 2050." 3.4 The same document details the Government's commitments to achieving decarbonisation targets of-: 2050 for net zero overall, domestic flights to achieve net zero by 2040 and for all airport operations in England to be zero emission by the same year. 3.5 These targets are however dependent on development and adoption of new technologies and working practices – which are still "work in progress" with no	

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		guarantees they will achieve the desired carbon reductions. The Government does recognise this, and state in the Jet Zero Strategy: "We recognise that many of the technologies needed to decarbonise the sector are at an early stage of development and therefore this approach is essential to allow new technology to be developed, tested and adopted across the industry."	
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Need Case Climate change	3.6 Despite the Government's own Climate Change Committee recommending in June 2022 that the Government "Implement a policy to manage aviation demand as soon as possible so the mechanisms are in place in the likely event that low emission technology are not commercially available to meet the Government's aviation pathway. The demand strategy should include a commitment to preventing any net airport expansion." No action has been taken on this.	In its March 2023 Response to the Committee on Climate Change, the Government made clear that it did not accept the need to limit growth of aviation or airport capacity expansion (response to recommendation 197) (Ref 8). As set out in the *Jet Zero Strategy*, Government expects the costs of carbon and/or its abatement to be met by the sector and passed through to passengers. This is expected to slow demand growth. This has been taken into account in the demand forecasts for the Proposed Development as set out in the **Need Case [AS-125]** using consistent assumptions to those used in the Jet Zero Strategy (Ref 1).

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CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	GHG/ Planning	3.7 The proposed growth of air traffic at Luton Airport represents a 60% increase in flights which will result in a massive increase in GHG emissions. This is neither "sustainable growth" nor "sustainable development". Para 4.1.1 of the Environmental Statement Appendix 12.1 states that: "Based on the GHG assessment reported in Chapter 12 of the ES [TR020001/APP/5.01], aviation contributes 83.4% of the overall GHG emissions of the Proposed Development. Most aviation emissions are outside the direct control of the airport." 3.8 Reducing the GHG emissions on aviation movements is therefore fundamental. The assumptions Luton Rising use to demonstrate how they will do this is are based on the implementation of as yet untried and tested new technologies and are therefore fundamentally unsound. 3.9 The proposals also breach the requirements of the National Planning Policy Framework (NPPF). The NPPF is clear that there are three overarching objectives for sustainable development. Paragraph 8 notes: "c) an environmental objective – to protect and enhance our	Greenhouse gas emissions have been assessed and reported in **Chapter 12 Greenhouse Gases [APP-038]** of the Environmental Statement (ES). Carbon emissions for aviation in the ES are modelled on the *Jet Zero Strategy* High Ambition scenario that represents current UK Government policy on aviation (Ref 1). The **Planning Statement [APP-194]** considers the requirements of the NPPF throughout the assessment. Compliance with NPPF policies is set out in full in **Appendix E Policy Compliance Tables[APP-199]** of the Planning Statement, from pages 211 - 251.

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		natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy"	
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Surface Access	3.10 Further, the NPPF states that the environmental impacts of transport infrastructure should be taken into account. Paragraph 104 notes: "Transport issues should be considered from the earliest stages of development proposals, so that… c) the environmental impacts of the transport infrastructure can be identified, assessed and taken into account… including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains…"	The environmental impacts of transport infrastructure and its use primarily relate to air quality, greenhouse gas emissions and noise impacts. Air quality impacts have been assessed and reported in **Chapter 7 Air Quality [AS-076]** of the Environmental Statement (ES). Greenhouse gas emissions have been assessed and reported in **Chapter 12 Greenhouse Gases [APP-038]** of the ES. Noise impacts have been assessed and reported in **Chapter 16 Noise and Vibration [AS-080]** of the ES. Each chapter identifies and assesses mitigation where it is required to mitigate adverse effects. A summary of proposed mitigation is set out in the **Mitigation Route Map [AS-047]**.

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			Compliance with NPPF policies is set out in full in **Appendix E Policy Compliance Tables [APP-199]** of the Planning Statement, from pages 211 - 251.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Climate Change	3.11 Climate change targets for all kinds of economic and social activity are now enshrined in legislation and these are stringent and will not be easy to achieve.	Noted. Greenhouse gas emissions have been assessed and reported in **Chapter 12 Greenhouse Gases [APP-038]** of the Environmental Statement (ES). Carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy High Ambition scenario that represents current UK Government policy on aviation (Ref 1).
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire –	Need Case	3.12 Together with proposals for Heathrow, Gatwick and Stansted Airports, there is a cumulative impact which requires urgent consideration for London and the southeast and eastern regions. Continued planning for airport expansion in southeast England as a whole is wholly inappropriate in the climate change emergency, as declared by Luton Borough Council and many other local authorities throughout the United Kingdom.	Greenhouse gas emissions have been assessed and reported in **Chapter 12 Greenhouse Gases [APP-038]** of the Environmental Statement (ES). Carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy High Ambition scenario that represents current UK Government policy on aviation (Ref 1).

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the Countryside Charity RR-0290		Quite simply, any increase in the number of planes will make it substantially harder to meet net zero given that current programmes are highly unlikely to deliver net zero.	
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Noise and Vibration	4. Noise and Air pollution 4.1 It is inevitable that noise pollution will increase with the proposed expansion and the impacts are underestimated in this application. Luton Airport is a site located within a tightly packed series of large towns and cities that are already adversely impacted by noise including Luton, Bedford, Biggleswade and Sandy in Bedfordshire as well as Hemel Hempstead, Harpenden, St Albans and Stevenage in Hertfordshire.	The impact of noise (day and night) due to increased vehicular and aircraft movements from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration [AS-080]** of the ES.
	Noise and Vibration	4.2 Areas of countryside in Bedfordshire, Hertfordshire, Buckinghamshire and Cambridgeshire already experience a loss of tranquillity on account of the airflight paths as identified in the London Luton Airport Annual Monitoring Report 2021. The nature of the noise, in terms of frequent apparently random short bursts of up to 20 seconds where the ambient noise level is	The approach to the assessment of noise and tranquillity in line with the National Planning Policy Framework (Ref **Error! Bookmark not defined.**) is set out in Section 16.5 of **Chapter 16 of the Environmental Statement (ES) [AS-080]**.The impact of noise on tranquillity due to increased aircraft movements from the Proposed Development has been assessed and all reasonably practicable measures have

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		generally low exacerbates the impact. The recent changes to the flight paths and new holding stack for the Airport in Cambridgeshire also result in aircraft flying over communities that have previously enjoyed relative tranquillity blighting both rural areas, communities and areas currently allocated for housing expansion such as Biggleswade.	been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration [APP-080]** of the ES. A further assessment of effects on special qualities of the AONB is being prepared in consultation with Natural England.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Noise and Vibration	4.3 It is accepted that, since 2017, the approved noise contours have been exceeded by Luton Airport and the Council has failed in its duty of enforcement. The absence of noise is an integral element to maintaining tranquillity, and beautiful scenery does not compensate for the intrusion of artificial noise	The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) has been designed to improve upon the existing noise control regime and to effectively prevent breaches from occurring. **Appendix 16.2 Operational Noise Management (Explanatory Note) of the Environmental Statement [APP-111]** sets out how the proposed Noise Envelope contains mechanisms that should have avoided the noise Limit breaches that occurred at the airport from 2017-2019. This is further elaborated on in the **Comparison of consented and proposed operational noise controls document [AS-121]** which provides a direct comparison between the current and proposed operational noise controls, noting that the Noise Envelope provides several enhancements to the current consented noise

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			controls that are designed to prevent breaches before they occur, such as independent scrutiny and oversight, increased transparency, adaptive mitigation and management plans and noise Limit reviews.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Planning	4.4 The proposals are also not compatible with the provisions of Luton Local Plan Policy LLP6, which even though it was redrawn to be more favourable to airport growth, states that expansion proposals should 'Include proposals which will over time result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents and occupiers and users of sensitive premises in the area, through measures to be taken to secure fleet modernisation or otherwise.	The Applicant is committed to sharing the benefits of future technological improvements (in terms of aircraft noise reduction) between communities and industry. The benefit of the transition to 'new generation' aircraft (e.g. the Airbus 320Neo and 321Neo and the Boeing 737Max) in the early years of expansion (phase 1) will be shared with the community, with the Noise Envelope Limits to be set at commensurate levels to secure this. For the later years of expansion (phase 2 and onwards), The Noise Envelope includes a defined mechanism to share the noise reduction benefits of future technological improvements in aircraft between the airport and local communities. This would be controlled through a requirement to review the Limits and Thresholds in 5-year cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance known.

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CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Noise and Vibration	4.5 The impact of noise from the Airport is therefore already widespread and a 60% increase in flights, will inevitably massively increase the impact of noise and spread the damage to health over an even wider area. The noise modelling/forecasting for the proposals relies on assumptions made about the use of quieter 'next generation' aircraft; a different fleet mix, incorporating larger aircraft, and working with the National Air Traffic Service to reduce holding delays at and near the airport.	In 2023, approximately 40% of the fleet are made up of new generation aircraft. Fleet modernisation is proceeding in line with expectations. It was always anticipated that fleet modernisation would largely take place over the period to 2028 and this is still the expectation. The Core Case forecasts that capacity is not going to be reached until 2043. By this time, it is expected that aircraft technology will have improved, and the next generation of aircraft will be entering service. These aircraft are expected to bring further reductions in noise. The Noise Envelope includes a defined mechanism to share the noise reduction benefits of future technological improvements in aircraft between the airport and local communities. This would be controlled through a requirement to review the Limits and Thresholds in 5-year cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance known.
CPRE Bedfordshire - The	Fleetmix	4.6 However, these are all outside of the control of Luton Rising. Promises on the replacement of current aircraft fleets with	By summer 2023, approximately 40% of the fleet is made up of new generation aircraft. Fleet modernisation is proceeding in line with

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Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290		less-noisy modern variants have not, and cannot, be kept by Luton Rising. Although some newer aircraft variants have appeared at Luton, the current picture is of predominantly older types of aircraft, and newer models do not always fulfil claims of lower noise levels on landing. 4.7 Therefore, the noise and air quality projections made in the documents are fundamentally flawed and should be revised to include other potential, less optimistic scenarios.	expectations. It was always anticipated that fleet modernisation would largely take place over the period to 2028 and this is still the expectation.
CPRE Bedfordshire The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Air Quality	5. Air quality 5.1 Luton Rising states that the future use of newer generation aircraft, together with more efficient and electric road vehicles will reduce emissions in the future. Luton Rising's air quality assessment, like the noise assessment, therefore, places significant reliance on these assumptions. However, as with the noise forecasting mentioned above, Luton Rising is not in a position to guarantee that the uptake of the newer generation aircraft and/or the use of more electric vehicles generally will be achieved as forecasted.	**Chapter 7 Air Quality [APP-034]** of the Environmental Statement has provided an assessment of air quality following the methodology agreed with the local councils in line with best practice guidance in relation to fleet projections and aircraft selection. A number of conservative elements were built into the air quality road traffic modelling and a model verification exercise was carried out to compare modelled predictions with real world results. All assumptions on road traffic fleet projections were based on best practice data produced by the government.

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			In relation to aircraft modelling, a conservative approach was also taken. The forecast aircraft fleet used in the core case has not assumed any next generation aircraft and average taxi times were assumed to be the same in the future as the times calculated in the baseline. This is considered to be conservative because the future designs are expected to reduce taxi distances and times.
CPRE Bedfordshire The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Air Quality	5.2 The air quality and pollution forecasting for the proposal therefore suffers from the same potential inaccuracies as the noise forecasts and modelling. Traffic to the airport also passes through a number of Air Quality Management Areas including Luton, Hitchin, Dunstable and St Albans and expansion will result in further harm to localised problems of air quality.	**Chapter 7 Air Quality [APP-034]** of the Environmental Statement (ES) has provided an assessment of air quality following the methodology agreed with the local councils. This included screening of traffic data within air quality management areas and modelling of any screened in roads. No significant impacts are predicted to occur. **Appendix 7.5 Outline Operational Air Quality Plan [APP-065]** sets out the measures committed to via the DCO which will help to improve air quality. It should also be noted that the assessment of road traffic and aircraft followed a conservative approach in line with best practice guidance.
CPRE Bedfordshire - The	Green Controlled Growth	5.3 It is not possible to conclude that the proposals can be achieved without significant noise and pollution impacts, or that these impacts can be suitable	It is acknowledged that the environmental effects of expansion need to be controlled. In order to place the Applicant's commitment to environmental sustainability at the very centre

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Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290		controlled, as is required by national aviation and local planning policy.	of the Proposed Development, it is proposed that growth authorised by the DCO will be managed through the **GCG Framework [APP-218]**, within environmental Limits defined based on the outputs of the Environmental Impact Assessment (EIA) prepared for the application for development consent. GCG will therefore ensure a proactive approach to managing environmental effects is secured, with Limits applying in four key areas: a. Aircraft noise; b. Air quality; c. Greenhouse gas emissions (for airport operations and surface access); and d. Surface access. The assessment of performance against the Limits for the four environmental areas listed above will be undertaken annually, with defined monitoring and reporting requirements set out as part of the framework and secured through the DCO. Where monitoring has shown that a Limit has been exceeded, the airport will not be able to continue growing until a specific series of steps

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			have been followed, as defined by the framework. Compliance with each of these steps will be secured through the DCO, and enforcement action could be taken if growth at the airport continued in contravention of the GCG Framework.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Surface Access	6. Traffic 6.1 We note that the Applicant has not yet been able to update their traffic modelling to comply with recent Government guidance on post Covid assumptions. This has knock on implications for a number of other studies and assumptions and we are unclear why it is considered acceptable to procced with considering and determining the application whilst this is still outstanding	Noted. The Applicant has responded to the request of the ExA on this point in writing with a timetable to address the recent Government guidance.
CPRE Bedfordshire - The Countryside Charity RR-0289	Surface Access	6.2 The Surface access to and from the airport is a key issue in the consideration of the proposals. Luton Airport's public transport links are already inadequate. and the airport has one of the lowest levels of public transport use of any airport in the London region.	The Applicant has prepared **a Framework Travel Plan [APP-229]** as part of the application for development consent. The need to produce, regularly review and update the TPs, based on the FTP, is secured through Requirement 30 of the **Draft DCO [AS-067]**. Future Travel Plans that follow the structure and requirements set out in the Framework

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CPRE Hertfordshire – the Countryside Charity RR-0290		6.3 The DART service connection has now opened from Luton Airport Parkway on the London Midland Line, but there will still be no direct rail service to the airport from London as this necessitates a change at Luton Parkway. The area lacks good public transport east to west as bus services are poor and east-west railway routes were lost back in the 1960's.	Travel Plan will have ambitious Targets that are above those set out in the **GCG Framework [APP-218]**, set in consultation with stakeholders. In order to meet these Targets a number of measures will need to be implemented, which could include improvements to local public transport services such as bus and rail. DART usage will be monitored as part of the Travel Plan monitoring, with each 5-yearly Travel Plan analysing the previous 5 years CAA mode share data.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Surface Access	6.4 The predicted increase in the use of public transport to 45% and subsequent reduction in the proportion of car-based arrivals and departures is of course welcomed. However, the existing Midlands Mainline already has capacity and congestion issues and the success of Luton DART, will depend on its usability, frequency and acceptance of its fares.	The Applicant has prepared a **Framework Travel Plan [APP-229]** as part of the application for development consent. Future Travel Plans that follow the structure and requirements set out in the **Framework Travel Plan [APP-229]** will have ambitious Targets that are above those set out in the **GCG Framework [APP-218]**, set in consultation with stakeholders. In order to meet these Targets a number of measures will need to be implemented, which could include improvements to local public transport services such as bus and rail.

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			Public transport usage will be monitored as part of the Travel Plan monitoring, with each 5-yearly Travel Plan analysing the previous 5 years CAA mode share data.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Surface Access	6.5 No evidence has been provided to demonstrate how and why the DART and the other limited coach and bus proposals will achieve the change in public transport usage. There needs to be far greater investment in a wider network of sustainable transport modes if the proposed targets of reducing car borne trips is to be achieved or improved. CPRE advocates, regardless of any expansion plans, a much more ambitious target of road traffic reduction.	The Applicant has prepared a **Framework Travel Plan [APP-229]** as part of the DCO application. Future Travel Plans that follow the structure and requirements set out in the **Framework Travel Plan [APP-229]** will have ambitious Targets that are over those set out in the **GCG Framework [APP-218]**, set in consultation with stakeholders. In order to meet these Targets a number of measures will need to be implemented, which could include improvements to local public transport services such as bus and rail. The airport operator is committed to funding these, as they have done in the recent past. A Sustainable Transport Fund is being delivered to ensure that any mitigation measures identified can be delivered.
CPRE Bedfordshire - The Countryside Charity	Surface Access	6.6 40,000 more passengers a day and the proposed additional 7,275 car parking spaces will generate more private car use, congestion and more GHG emissions. The road network will inevitably be inadequate	The Applicant has undertaken reporting on the forecast traffic flows and associated effects - as well as the proposed means of ensuring modal shift and mitigation measures to ensure the adequacy of the highway network - in the

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RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290		and congested, and this will lead to further pressures for road building around the site and into nearby countryside.	**Transport Assessment [APP-203 to APP-206].** A means of monitoring traffic flows on the public highway is in development and will be reported on in due course.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Need Case	7 Economic forecasting 7.1 With regard to the demand for aviation, CPRE Bedfordshire would point to 'flight free' campaigns and evidence that people and organisations are questioning their need to fly more than ever. Sustainable strategies for air travel should align with land use planning strategies in reducing the need to travel and the costs and benefits of flying should be reassessed in the context of the climate emergency.	There is little evidence that the underlying relationship between economic growth and the demand for air travel, which forms the basis for the demand forecasts, is changing. The evidence is that demand for air travel is recovering as expected from the effects of the COVID-19 pandemic, having regard to economic recovery. With the 10 largest UK airports, including London Luton Airport, reporting overall recovery of demand to 95% of 2019 levels in May 2023. This is on track for the market to have recovered to 2019 levels by 2024 as set out in the **Need Case [AS-125]**
CPRE Bedfordshire - The	Need Case	7.2 The Need Case makes much of the importance of the proposed Ox Cam Arc. In particular how this Government backed	Whilst the **Need Case [AS-125]** refers to the Oxford-Cambridge Arc as part of the economic context, this is not the principal basis of the

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Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290		growth strategy will result in an increase in usage of the airport and how the airport expansion will play an important role in achieving the Arc's growth objectives. However, the Arc has now been relegated from a Government to Regionally led initiative, the proposed expressway has been cancelled and future long term funding sources are unclear. The reliance and importance the Needs Case places on this initiative is therefore ill founded.	economic case, which relates to delivering jobs and economic benefit to the local area, in particular Luton and other areas in need of levelling up.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Need Case	7.3 Future growth should not be seen as inevitable, and the demand forecasts underpinning this proposal will be affected by national and international policy, approaches to economic growth which can influence demand as well as local changes to commercial activity. This is particularly relevant when specific developments, such as this proposal, have major environmental impacts which reduce living and working conditions for huge number of people.	The demand projections are based on Government economic forecasts, which take into account policies on economic growth.
CPRE Bedfordshire - The	Economic case and job creation	7.4 The forecast of 12,000 new jobs as a result of airport expansion is considered highly unreliable. There is no linear	The employment forecasts have been developed using robust techniques which do not assume a linear relationship. The

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Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290		relationship between growth and local jobs and employment claims are routinely over-stated by development promoters. 7.5 Over the period 2010 to 2018, passengers through Luton Airport increased by 90% (8.7 million passengers per year to 16.6 million) but directly employed jobs, a proportion of which are part-time, increased by only 26% (8,200 to 10,400). This was significantly below the previous forecast benefits. When the second runway at Manchester was proposed, the promised 55,000 jobs were subsequently reassessed to be less than 6,000.	methodology is set out in full in **Appendix 11.1 Oxford Economics The Economic Impact of London Luton Airport (2022) [APP-079]** to the Environmental Statement. There have been methodological changes in terms of the extent to which non-airport related employment in close proximity to the airport is included in the employment estimates. As a consequence, as explained in **Appendix 11.1**, employment estimates made prior to the application for development consent are not comparable with the current and future estimates which address only employment related to the operation of the Airport. The number of new jobs (compared to 2019) as a consequence of the Proposed Development is expected to be 6,100 across the Three Counties of Bedfordshire, Buckinghamshire and Hertfordshire, of which only 4,200 are expected to be direct on-site employment. In relation to the Manchester Airport employment, the figures cited are not comparable. The 55,000 jobs figure cited was the upper bound overall employment footprint of the airport across the entire North West of England in 1993 [Second Runway Inspector's

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			Report at paragraph 26.24.24] not the expected impact of the second runway. The figure included tourism impacts and also an assessment of broader catalytic effects on business and inward investment more generally across the region. In 1993, the Airport supported 10,600 direct jobs on-site with a further 6,000 direct airport related jobs off-site, when it was handling 13.3 mppa [Ibid, Table at paragraph 3.7.42]. In 2013, when it was handling 20.4 mppa, the number of direct jobs (on- and off-site) had increased to 27,000 (Manchester Airport Sustainable Development Plan 2016), an increase of 10,400 direct jobs. These figures exclude indirect and induced employment as well as the wider catalytic effects which would be additional.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the	Economic case and job creation	7.6 A previous statement by Oxford Economics Forecasting (PEIR, Vol 3, Appendix 13-1, para 1.2) in the 2019 consultation, stated that 'we estimate and forecast the economic contribution of London Luton Airport, but we do not make any assessment of the extent to which the contribution identified will be additional to what would have occurred in the absence of its future development'. This suggests that much of the forecast economic growth	**Appendix 11.1 Oxford Economics The Economic Impact of London Luton Airport (2022) [APP-079]** to the Environmental Statement is similarly presented in gross terms. The question of the extent to which such growth could have occurred in any event or represents growth displaced from elsewhere is addressed at **paragraph 8.3.6** of the **Need Case [AS-125]**.

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Countryside Charity RR-0290		may happen regardless and independent of the proposals.	
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Economic case and job creation	7.7 The airport expansion will add to the tourist spending deficit. This takes spending and economic activity out of the country, and in the absence of expansion more of the tourist spend would remain within the domestic economy. No account of this effect is made within the application and a more sustainable alternative strategy would limit overall numbers travelling, retaining local spend, creating more work and employment without accelerating climate change.	For the reasons set out in **Section 3** of the **Need Case [AS-125]**, it is not Government policy to restrict outbound tourism activity because of the wider social and economic benefits it brings. The matter of the tourism benefit was scoped out of the assessment (see **Appendix 1.1** Scoping Report of the Environmental Statement **[APP-166]**]) but the matter is addressed at **paragraph 8.5.19** of the **Need Case**.
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the	Economic case and job creation	7.8 Luton Council has relied for too long on the Airport as an income generator and employment hub. It needs to spend time, effort and money on looking at how to diversify the local economy and reduce its financial dependence on the success or otherwise of the Airport. The Council has invested massively in the Airport borrowing millions of pounds to underpin its viability and profitability. This is not a role or risk a Local Authority should take prejudicing its	The Applicant is not responsible for Luton Borough Council's wider economic or commercial strategies, and therefore does not feel it is appropriate to comment on this point. The separation between The Applicant and Luton Borough Council is set out in **Role and Responsibilities of Luton Borough Council [TR020001/APP/8.29]**.

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Countryside Charity RR-0290		ability to deliver local services which is what it is there to do.	
CPRE Bedfordshire - The Countryside Charity RR-0289 CPRE Hertfordshire – the Countryside Charity RR-0290	Need Case	8. Conclusion 8.1 The joint CPREs strongly oppose the proposed expansion of Luton Airport. The growth proposals are ill founded, not suitably evidenced and completely ignore the current climate crisis. 8.2 Luton Rising should focus on working within its current financial and operational parameters and deal with the inadequacies of its response to existing operations. There is no reasonable case for expansion and this application should be refused.	Noted.

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Friends of Wigmore Park RR-0472	Consultation	Options available during consultations had already been rejected.	The pre-application consultation process comprised the following main stages: • non-statutory consultation (25 June 2018 to 31 August 2018); • 2019 statutory consultation (16 October 2019 to 16 December 2019); and 2022 • 2022 statutory consultation (8 February 2022 to 4 April 2022). The 2018 non-statutory consultation presented options to expand the airport by making best use of the existing runway. Information on a long list of potential options was presented, and a description of the sifting process the Applicant went through to reach a short list of four options was provided. Information about each of the options was presented, and the option appraisal process described in two reports, the Sift 1 and Sift 2 Reports which are available in **Appendix B** of the **Design and Access Statement [APP-209 and APP-210]**. The four options identified for non-statutory consultation comprised three options that focused development to the north of the runway, and a

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			fourth option that focused development to the south of the runway. Of these options, Option 1a, which focused development to the north of the runway and had two terminals, was identified as the emerging preferred option prior to the consultation commencing. A consultation report summarising the 2018 consultation feedback and how it had informed the scheme was published after the consultation, alongside the Sift 3 report summarising the updated options appraisal. A copy of the 2018 consultation feedback report can be found in **Appendix A** of the **Consultation Report [APP-174]** and the Sift 3 report is appended to the **Design and Access Statement [APP-211]**. The purpose of the 2019 statutory consultation was to seek views on the preferred option which had been developed in response to feedback from the 2018 non-statutory consultation. The key changes following the 2019 statutory consultation period are provided in paragraph 1.3.12 of the **Consultation Report [AS-048]**. The 2022 statutory consultation sought views on the Proposed Development as updated to reflect the 2019 feedback. The key changes following the

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			2022 statutory consultation are summarised in paragraph 1.3.17 of the **Consultation Report [AS-048]**.
Friends of Wigmore Park RR-0472	Surface Access	Proposed breach of the Luton Local Plan adopted in 2017, that bans the use of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency. The planned use of residential roads to facilitate access to the airport from the east rather than providing a dedicated bypass. The planned installation of 7 sets of traffic lights in the ward of Wigmore to replace 7 roundabouts plus 3 additional sets for new road junctions when Wigmore has no traffic lights at present. The applicant makes no mention of Satellite Navigation Systems, which all choose a different route from the mitigated route to get to and from the A505 and the East of England due to the breach of the Luton Local Plan.	**Section 8** of the **Transport Assessment [APP-203 to APP-206]** sets out the approach to traffic generation and distribution. The majority of Airport related passengers arrive from the west and via the motorway network. Signage to the Airport is from the major road network and where traffic approaches from the east is signed via the A505. Highway improvements have been proposed on the main road network including M1 Junction 10, the A1081 Airport Way and Vauxhall Way to seek to provide capacity on the main routes into the Airport. Some people may choose to take alternative routes and we have therefore taken steps to provide capacity improvements to the local network to ensure that if they do, local traffic is not adversely impacted. The Application also proposes the Airport Access Road (AAR), similar to Century Park Access Road (CPAR) permitted under an earlier local planning application, to connect Airport Way to the consented Century Park development (now known as Green Horizons Park) which is located to the east of the Airport.

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			The AAR is included as part of the application for development consent and provides the certainty that the road would be delivered ahead of the time it would be relied upon for access to the expansion area east of the existing airport. The DCO application will be decided in accordance with Section 105 of the Planning Act 2008 (Ref 9), which sets out the matters the Secretary of State must have regard to in deciding on the application. The application is not made under the Town and County Planning Act 1990 and therefore not subject to Section 70(2) (Ref 10), which requires the Application to be determined in accordance with the Development Plan, so far as material to the application.
Friends of Wigmore Park RR-0472	Wigmore Valley Park	The planned destruction of most of the award winning Wigmore Park and all of its County Wildlife Site. That most the replacement Wigmore Park is in Hertfordshire and not Luton so cannot be counted as Luton Open Space. The proposal will see 1,152,000m2 of vegetation clearance and 82,000m2 of mature tree clearance. Many people will live too far to benefit from the replacement Wigmore Park, due to the distance required to walk to it. The plans include	It is acknowledged that the southern part of Wigmore Park, including the country wildlife site, will be lost for the Proposed Development. Due to the proposed loss of this resource, the park and its habitats were subject to extensive ecological surveys (as reported in **Appendix 8.1 Ecology Baseline Report [AS-033 AS-034]** of the Environmental Statement (ES)) and the DCO application proposes replacement open space and habitats, as assessed and described in **Chapter**

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		areas of hedge restoration on land that is not owned by Luton Rising or under the planning authority of Luton Borough Council. Much if this land is subject to other planning applications.	**14** of **the ES [AS-079]** and shown in the **Strategic Landscape Masterplan [APP-172]**.The impact on the County Wildlife Site is assessed and reported in **Chapter 8 of the ES [AS-027]** (Section 8.9)**,** whilst the initial loss is considered significant in the short term the replacement habitats provided by the Proposed Development reduce this to not significant in the long term. Overall, the Proposed Development will result in a biodiversity net gain of at least 10% as reported in **Appendix 8.5 [APP-067]** (Section 6). The northern part of the park remains as existing (to be improved as part of the Green Horizons Park planning permission) and will remain accessible from the same locations with the replacement open space directly to the east instead of the south. The replacement open space is directly adjacent to the east of the remaining existing park so that it remains accessible to the population currently using the park. It has not been claimed that it is 'Luton Open Space' but is accessible to people from Luton as well s the surrounding area. Any attempt to replace the open space in Luton would

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			mean it would be disconnected from the existing space. The replacement open space is larger in area than the existing, so its eastern boundaries are further away. However, those wishing to walk the same distance are free to do so, they do not need to travel further to use the park. The open space will also be designed to be more accessible, which means it will be available to a wider range of users than is currently the case, including those with mobility issues, and those with pushchairs, or on bicycles, as shown in the **Strategic Landscape Masterplan [APP-172].** The hedgerow restoration provided to the north east of the replacement open space is for landscape and visual screening mitigation and therefore needs to be in that location. If other development goes ahead which means that mitigation is no longer required it would not be implemented. The areas required for hedgerow restoration are within the Order Limits and appropriate land powers are being sought for the planting and subsequent maintenance of the hedgerows.

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Friends of Wigmore Park RR-0472	Climate Change Resilience	While the application makes reference to a net zero airport it is not committed to net zero aircraft only using the airport.	The carbon emissions for aviation as reported in **Chapter 12 Greenhouse Gas [APP-038]** of the ES are modelled on the Jet Zero Strategy[1] High Ambition scenario that represents current UK Government policy on aviation. The greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK Emissions Trading Scheme (UK ETS) within the European Economic Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).
Friends of Wigmore Park RR-0472	Air Quality	Under these proposals aircraft pollution will rise.	Chapter 7 of the ES [**AS-076**] reports the an assessment of air quality impacts, including consideration of pollution from aircraft following the methodology agreed with the local councils. The methodology followed is in line with best practice guidance and policy outlined in section 7.2 of **Chapter 7** of the ES [**AS-076**]. No significant impacts on air quality are predicted to occur as stated in paragraphs 7.9.4 – 7.9.41 of **Chapter 7** of the ES **[AS-076]**.

[1] Ref 12.1 Department for Transport (2022) Jet Zero Strategy: Delivering net zero aviation by 2050

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Friends of Wigmore Park RR-0472	Noise and Vibration	Despite living outside the noise contour lines many residents in Wigmore and Vauxhall Park are kept awake or woken by aircraft movements overnight. This application proposes more noise and more disturbance. Residents can have prolonged periods of smelling aviation fuel. This will get worse.	The impact of noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the ES [AS-080].** Noise contours do extend into Wigmore and Vauxhall Park, for example see **Figures 16.103 and 16.104 of the Environmental Statement [AS-119]** which show the ground noise contours for the 2019 baseline. Comments regarding odour were identified during statutory consultation in 2019. In response to this, an odour assessment has been undertaken and is presented in **Chapter 7 Air Quality of the ES [AS-076]**. The odour assessment concluded that the impact of the Proposed Development on odour is considered to be **not significant**. Best practice measures to mitigate odours from the airport are provided in the **Outline Operational Air Quality Plan**. **Appendix 7.5** of the ES **[APP-065]**.

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Friends of Wigmore Park RR-0472	Surface Access	The application offers no proposals or solutions regarding a lack of East-West public transport. The plans include increasing car parking spaces by of over 56%.	The Applicant is supportive of measures to improve active and sustainable travel modes and will work with local authorities and public transport operators to implement any improvements wherever reasonably practicable. Further detail on interventions and funding will be provided in future Travel Plans, which will draw on the toolbox of interventions provided in the **Framework Travel Plan [AS-131]**. The Applicant is committed to increasing sustainable transport mode share to the Airport, the overall growth in passenger numbers will require additional car parking to be provided to meet the Airport's needs. Whilst there is a growth in car parking, the ratio of total parking to passengers decreases over time to reflect increasing sustainable transport mode share.
Friends of Wigmore Park RR-0472	Earthworks	The unregulated landfill site borders residential homes, which needs to be disturbed or removed	The historic Eaton Green landfill is located approximately 50 m from the nearest residential properties. The landfill has been comprehensively investigated and risk assessments undertaken in accordance with current UK Government guidance on managing risks from land contamination – Land Contamination Risk Management (LCRM), as reported in **Appendices 17.1 to 17.4 [APP-113 to APP-124]** of the Environmental Statement.

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			Earthworks undertaken to the historical landfill will require an environmental permit, in accordance with waste legislation, with the Environment Agency as the regulating body.
Friends of Wigmore Park RR-0472	Ecology	During 2019 Luton Rising moved orchids to new sites due to soil testing. They all died despite advice and guidance of Luton Borough Council's Senior Ecological Officer. We have no faith that any future moves will be any more successful.	The proposed Ecological Mitigation Strategy for Orchids and Invertebrates was submitted as part of the Environmental Statement **(Appendix 8.10 [AS-035])** as well as the wider management proposals for the open space and habitats, including monitoring and management under trust for 50 years, described in the **Outline Landscape and Biodiversity Management Plan (Appendix 8.2 of the ES [AS-029]**). The trial translocation referred to has been acknowledged and the proposed method and location of receptor sites have been developed to improve the proposed translocation.
Friends of Wigmore Park RR-0472	Surface Access	A plan shows a possible enlarged residential parking scheme due to passengers and staff avoiding airport car parks. No mention is made who will fund it. In 2020 the directors of Luton Rising acted against the public interest by refusing to declare an interest and voted against a proposal at full council that Luton Rising or the Airport Operator should pay for it. The motion was defeated meaning the	The **Framework Travel Plan [AS-131]** sets out measures related to on-highway parking in Table 5.1. These include carrying out a feasibility study on restricted parking zones, supporting the expansion of the residents parking zone north of the airport and working with local authorities to develop an approach to prevent airport-related parking causing a nuisance to residents. The Applicant and Operator are currently developing a suitable and effective funding mechanism that best responds to the vision and objectives of the

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		residents had to fund a scheme only required due to the airport.	**Surface Access Strategy [APP-228]** and realising Sustainable Transport Opportunities. Further details will be shared during the course of the examination, following further consultation with relevant stakeholders on the details of the Sustainable Transport Fund.
Friends of Wigmore Park RR-0472	Cost	One of the finance proposals is that Luton Rising raises finance to fund expansion. In 2019/2020 Luton Rising lost £3.3m. In 2020/2021 the company lost £110m. In 2021/2022 the 12 month loses came to £232.1m. The auditors stated that they have put an impairment on the DART of £184.7m as unrecoverable. The directors of Luton Rising are appointed councillors with no special talents in running the loss making company. The role of the directors is to exercise independent judgement and to exercise reasonable care, skill and diligence. This has not happened. Luton Rising debts stand close to £500m. Any more borrowing could result in financial disaster for the town's taxpayers.	The figures quoted are broadly correct. However, it must be noted that a key reason for the loss reported in each year was due to changes in the fair value of investment assets and does not reflect the underlying operational performance of the business. The Applicant was required to seek and agree a financial stabilisation package as a result of the impact of Covid-19 and subsequent collapse in passengers travelling due to restrictions imposed on travel. This financial package agreed with Luton Borough Council ensured that the Applicant continued to operate through the recovery from the effects of Covid-19 and enable future growth. The Applicant's Board of Directors is comprised of elected councillors and experienced and competent Executive Officers. There is a strong and evident governance process administered at Executive level.
Harpenden Sky.com RR-0530	Air Quality Noise Climate health	There are 2 fundamental concerns: [a] air quality degraded from significantly increased environmental pollution due to	The air quality assessment (**Chapter 7 [AS-076]**) has provided an assessment of air quality in Luton and Harpenden following the methodology agreed with the local councils. No significant impacts on

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		greenhouse gasses arising from Luton airtraffic eg PM2.5, CO2, NOx [b] noise disturbance above what are already intolerable levels due to Luton airtraffic at low altitude [eg 5,000 feet]. [a] Environmental Pollution: air quality degradation across Luton & Harpenden from 32m passenger airtraffic will lead to non-compliance with DEFRA Environmental Improvement plan interim targets, increased mortality particularly with vulnerable groups, non-compliance with Sixth Carbon Budget, non-compliance with Luton Council Climate Emergency, non-compliance with Herts County Council Sustainable Hertfordshire Strategy.	air quality are predicted to occur, and the Proposed Development is not predicted to impact compliance with the air quality standards. The health effects from air quality associated with the Proposed Development are assessed and reported in ES **Chapter 13 on Health and Community [AS-078]**, no significant effects were identified. The impact of noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the ES [AS-080]**. Carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy High Ambition scenario that represents current UK Government policy on aviation. The greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK ETS within the European Economic Area, and the global CORSIA. UK ETS sets an overall, scheme-wide cap on the amount of carbon which may be emitted by

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			operators, including participating airlines. The available allowances place a cap on the total amount of GHG emissions that can be emitted by sectors, including aviation, covered by the UK ETS. This cap will be reduced over time stimulating innovation by participants to increase the carbon efficiency of their operations, or indeed to take steps which would reduce the overall scale of their operations. This effectively puts a binding cap on the amount of GHG emissions the aviation sector can emit. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050.
Harpenden Sky.com RR-0530	Noise & Vibration	[b] Intolerable Noise Disturbance: a significant increase in Luton air traffic noise disturbance due to Luton flights at 5,000 feet which is too low. The altitude must return to the aim of LLAOL FL100 which determined 10,000 feet by rail line. More detail available at examination stage. Reference TR020001 NEDG Final Report According to CAA Guidance, CAP1129 & the NED Final report 12/2022 "For an envelope to function as intended, it is	The impact of noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the ES [AS-080]**. The Noise Envelope proposals have been developed in consultation with the Noise Envelope Design Group (NEDG) and the Applicant has taken regard of their recommendations. The Noise

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		essential that full agreement is achieved between all stakeholders on the envelope's criteria, limit values, means of implementation & enforcement". We disagree with the unilateral alterations made by Luton Rising [LR] which critically weaken the NED & related controls by reducing the limit values used to assess noise impact & increase the threshold levels which trigger corrective action. Consequently, the necessary agreement between all stakeholders has not occurred & recommendations for robust enforcement have even been ignored, particularly bearing in mind the past LR/LLA performance which has been strewn with errors or misleading data. Due to this NED dilution by LR, the risk of noise limit breaches will inevitably increase & must therefore be formally reviewed more frequently & robustly at a maximum frequency of 2 or 3 years. The review must be conducted in conjunction with community groups & independent authority to firmly establish the standard of enforcement & overcome the difficulties experienced in the commercially restricted consultation process.	Envelope Design Group contains representatives from industry, community groups, local authorities and independent experts. The membership of the NEDG is described in Section 16.4 of **Chapter 16 Noise and vibration [AS-080]** of the ES. Engagement with the NEDG is also described in the NEDG Final Report (see Annex A of **Appendix 16.2 of the ES [APP-111]**). A total of 19 meetings have been held with the NEDG between 2019 and 2022. This engagement is summarised in Section 16.4 of **Chapter 16 Noise and vibration [AS-080]** of the ES. Throughout this process, community groups have been represented in the NEDG by the Luton and District Association for the Control of Aircraft Noise (LADACAN) representative and, whilst they were active, the London Luton Airport Town and Village Community Committee (LLATVCC, now disbanded). As part of the NEDG terms of reference, this representation was on behalf of all community groups. The NEDG worked with the LADACAN representative to enable draft proposals to be shared and commented on by other established community groups. The Applicant is pleased to note that there are a large number of recommendations from the NEDG that have been accepted and adopted in the Noise Envelope proposals. Whilst the Applicant has

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			carefully considered all of the recommendations from the NEDG, there are some recommendations which have not been adopted, and in such cases the Applicant has developed alternative proposals based upon relevant best practice, guidance and policy. A summary of the NEDG recommendations and the Applicant responses are provided in Annex B of **Appendix 16.2 of the ES [APP-111]**. The NEDG support the proposal for the formal review period to be every five years. However, it should be noted that annual monitoring will also be undertaken. To oversee the Green Controlled Growth Framework (within which the Noise Envelope site), a new, independent body known as the Environmental Scrutiny Group (ESG) will be established. As the airport grows, environmental monitoring (including noise) will be undertaken and submitted annually to the ESG, via a series of topic-specific Technical Panels. Both the ESG and Technical Panels will include representatives of local authorities and independent technical specialists. For more information see the **Green Controlled Growth Explanatory Note [APP-217].**
SKWALE – Studham,	Concession	1. Agreements between LBC and Luton Airport unclear. The proposed expansion	Luton Rising and Luton Borough Council have a concession agreement with London Luton Airport

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Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Current 18mppa noise violation	plans for Luton Rising should address the agreement with the Airport consortium and the impact of contract renewals, recently rescheduled, to 2032 from 2031. It is important to establish a clear link between potential renewals and LBC (Local Borough Council) and Luton Rising before the community can make an informed decision. In the latest annual report by Luton Rising (uploaded 10 June), it is apparent that Luton Rising has agreed certain passenger number growth with the airport operators and is financially liable if the agreed numbers are not be met. What are these numbers? In addition, £45m of local authority money was paid to the airport operators as 'special force majeure' payments, yet in an emergency budget the council had to make cost savings of £21m. Why is the Council shoring up the airport operators at the expense of the local community? In addition, the airport operators paid themselves £5m and £10m in dividends in 2020 and 2021, while pleading poverty and getting payments from the Council! Somehow it seems that	Operations Ltd which rund until 2032. There are a number of options for the operation of the airport beyond that date and it is too early to decide the most apporpriate route at this time. The various options will be considered at the appropriate time. The **Funding Statement [APP-012]** describes how later stages of the programme could be funded. As disclosed in the accounts, as a consequence of the impact of the Covid 19 pandemic, Luton Rising reached a settlement for an amount of compensation to be paid to the airport operator. The amount agreed was £45m against a claim for relief from Covid 19 from its first impact at the airport which began to be seen in March 2020 through to when it was expected that the airport may have recovered from the impact of the pandemic. Given that the settlement was an amount that combined both past and future forecasts of loss, it was necessary to have an adjustment mechanism in the event that there was a material difference of greater than 5% in the key business assumptions around passenger numbers. The key indicator for the majority of income through an airport is the number of passengers that flow through the airport

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		the priority for the Council is the airport, yet the returns seem weighted to the private airport consortium, and there is a sense that the push for expansion may be more to do with this than real need.	and recovery back to the consented limit was forecast to take a period of time. Given the variable period of time, an adjustment mechanism was designed whereby the airport operator would receive an additional settlement if passenger recovery was slower than expected in the relevant concession year, as the loss would have been higher than expected. Conversely Luton Rising recovered some of the settlement amount if passenger recovery was faster than had been expected at the time that the settlement amount was agreed in March 2021. This is what we call the Passenger Adjustment Mechanism, not as incorrectly noted in the published accounts 'Passenger Access Mechanism'. There is nothing in it that incentivises growth for the operator or for aviation partners and the forecasts on which the mechanism was based recognised the planning and operational constraints. The function of the mechanism is simply to measure the difference between the anticipated passenger numbers from March 2021 and actual passenger numbers and accordingly make an adjustment to the agreed settlement.
SKWALE – Studham,	Noise and Vibration	The existing expansion permission, which still has 7 years remaining, has not fulfilled	The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) has been

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Kensworth and Whipsnade Against Luton Airport Expansion RR-1406		its promises regarding noise reduction. Both LBC and the airport have violated Section 106 of the Noise Control Agreement and have failed to rectify the situation for three years. These oversight, regulatory, and management failures are insufficient grounds to justify further expansion.	designed to improve upon the existing noise control regime and to effectively prevent breaches from occurring. **Appendix 16.2 Operational Noise Management (Explanatory Note) of the Environmental Statement [APP-111]** sets out how the proposed Noise Envelope contains mechanisms that should have avoided the noise Limit breaches that occurred at the airport from 2017-2019. This is further elaborated on in the **Comparison of consented and proposed operational noise controls document [AS-121]** which provides a direct comparison between the current and proposed operational noise controls, noting that the Noise Envelope provides several enhancements to the current consented noise controls that are designed to prevent breaches before they occur, such as independent scrutiny and oversight, increased transparency, adaptive mitigation and management plans and noise Limit reviews.
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion	Noise & Vibration	2. Noise Pollution: We reject the planning application due to the massive negative impact on all areas of human health and sleep in this area	An assessment of the impact on health and communities, including an assessment of sleep disturbance, has been undertaken and reported in **Chapter 13 Health and Community of the Environmental Statement [APP-039]**. This assessment inherently considers impacts and results of the assessment in **Chapter 16 Noise**

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RR-1406			**and Vibration of the Environmental Statement [AS-080]**.
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Noise & Vibration	added to the fact that there has been historic negligence in maintaining noise levels.	The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) has been designed to improve upon the existing noise control regime and to effectively prevent breaches from occurring. **Appendix 16.2 Operational Noise Management (Explanatory Note) of the Environmental Statement [APP-111]** sets out how the proposed Noise Envelope contains mechanisms that should have avoided the noise Limit breaches that occurred at the airport from 2017-2019. This is further elaborated on in the **Comparison of consented and proposed operational noise controls document [AS-121]** which provides a direct comparison between the current and proposed operational noise controls, noting that the Noise Envelope provides several enhancements to the current consented noise controls that are designed to prevent breaches before they occur, such as independent scrutiny and oversight, increased transparency, adaptive mitigation and management plans and noise Limit reviews.
SKWALE – Studham,	Noise & Vibration	Flights will go throughout the day and night with only respite between 5.30am – 6.30am. o The proposal has hidden the	The impact of noise during the night from the Proposed Development has been assessed and all reasonably practicable measures have been

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Kensworth and Whipsnade Against Luton Airport Expansion RR-1406		true impact of night and early morning flights in the documentation, which demonstrates that the public is right not to believe in the 'good faith' which Luton Rising claims to be showing to the local communities. Luton Airport's measurements fail to account for the actual noise levels and frequency of pollution when planes fly overhead, resulting in constant noise exceeding 70dB for 22 hours a day. The claim in the report that we will be within the 45dB contour is based on inaccurate data, as it includes days when planes approach from different angles and no noise is reported. We strongly disagree with this analysis. When planes flew over us in 2019, the official recorded noise levels ranged from 69dB to 75.5dB for each plane. This means that on over 40% of days in a year, we would experience noise levels averaging 71.5dB every few minutes for 22 hours a day, for at least 130 days annually. This invasion of our privacy, home life, and civil liberties cannot be mitigated by noise insulation in our homes, and discussions with Luton Rising suggest limited access to	explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the ES [AS-080]**. The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217])** contains legally binding night-time noise Limits and the Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the **Draft Development Consent Order [AS-067]**. It is not agreed that the noise contours are based on inaccurate data. The noise model has been extensively validated using radar track data and noise measurements, exceeding the requirements for noise model validation set by the Civil Aviation Authority (Ref 11). See Section 6 of **Appendix 16.1 of the Environmental Statement [AS-096]** for full details of the aircraft noise validation. It is assumed that the noise contours that the respondent is referring to are the L_{Aeq} noise contours. Noise measurements of single plans cannot be compared to the L_{Aeq} noise metric, which is a metric which represents all the noise events over a 16 hour (during the day) or 8 hour

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		such insulation. The detrimental impact on our sleep, hearing, mental health, and cardiac health is scientifically proven. World Health Organisation said in 2009 "sleeping satisfies a basic need and the absence of undisturbed sleep can have serious effects on human health". The WHO's 2018 Environmental Noise Guidelines indicate that noise can cause many Critical negative health outcomes. The proposal has hidden the true impact of night and early morning flights in the documentation, which demonstrates that the public is right not to believe in the 'good faith' which Luton Rising claims to be showing to the local communities.	(during the night) period. The L_{Aeq} metric has been shown to best correlate with noise and health effects in line with Civil Aviation Authority guidance and research (Ref 12, Ref 13). Although the dose-response relationship in the 2018 WHO Guidelines (Ref 14) is not currently adopted in UK policy, sensitivity testing of the noise and health effects of the Proposed Development using the relevant updated relationships in the WHO guidelines has been undertaken and is presented in **Chapter 13 Health and Community of the ES [APP-039]**.
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Air Quality Health	3. Air Pollution (NO2 etc): We reject the planning due to the real impact that increased pollution levels from aircraft and traffic will have on heart disease, lung disease, cancers, stroke, mental health and respiratory conditions. (NO2, Ozone, microparticles, kerosene particulates, etc). We do not believe that the planning has taken this into adequate consideration, particularly the serious health burden of	The air quality assessment (**Chapter 7 [APP-034]**) has provided an assessment of air quality, including all emissions from aircraft, vehicles and other airport related sources, in Central Bedfordshire following the methodology agreed with the local councils. No significant impacts are predicted to occur. The health effects from air quality associated with the Proposed Development are assessed and reported in ES **Chapter 13 on Health and**

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		increasing levels of pollutants. If there are 60% more flights, there is a 60% increase in these pollutants and with increased traffic numbers (at least 60%), there is an additive effect. Thus, this will seriously impact the health of those living near the airport. The health impacts of increased levels of these pollutants is well documented in Prestigious journals such as the BMJ, high and increased concentration of these pollutants have a direct negative impact on respiratory diseases, such as asthma and lung cancers. In addition there has been recorded cell damage at the DNA level, as well as an increase in heart disease and stroke.	**Community [AS-078**], no significant effects were identified.
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Greenhouse Gases	4. Air Pollution (Greenhouse gases): We reject the planning application due to the significant negative impact it will have on the climate emergency and greenhouse gas levels. The proposed expansion would result in a dramatic increase in emissions, including ozone, with associated health impacts. This expansion is unnecessary, and emissions will rise by at least 60% in all areas, contradicting the country's zero-carbon goals. Furthermore, there is no	An assessment of changes to greenhouse gases due to the Proposed Development is provided in the **Environmental Statement Chapter 12 Greenhouse Gases [APP-038].** This Chapter sets out future emissions forecasts and how they will be managed. The UK government has set a legally binding target, under section 1 of the Climate Change Act 2008, to achieve net-zero greenhouse gas

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		foreseeable significant improvement in airport/airline technology over the next 20 years, indicating a continuous rise in pollution as a direct result of this expansion.	emissions by the year 2050 and to meet their 5-yearly carbon budgets. Carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy High Ambition scenario (Ref 1) that represents current UK Government policy on aviation. The greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK ETS within the European Economic Area, and the global CORSIA. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050.
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Surface Access	5. Road Traffic The massive increase in road traffic and probable expansion of the road systems has not been taken into account by the Luton rising (Luton Borough Council) as well and so the figures are a considerable underestimation of all forms of pollution – noise, air and climate.	The Applicant sets out the assessment of the impacts of the increase in vehicle trips in the **Transport Assessment [APP-200 to APP-206],** which is based on "reasonable worst case" assumptions. These assumptions include an increase in public transport mode share for passengers to 45% (from 38% of total passengers in 2019). The surface access passenger mode share Limit within the **Green Controlled Growth Framework [APP-217]** requires this to be achieved when airport throughput reaches 27million passengers per annum, in order for

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			growth to continue towards the maximum consented capacity. Increases in staff sustainable transport mode share are also assumed in the TA and secured through the **GCG Framework [APP-218]**. Where highway mitigation is required on the basis of the assessment of traffic for this "reasonable worst case" scenario, it has been identified in the TA, with a range of off-site highways works set out in **Appendix A** of the **TA [APP-200]**. The **Framework Travel Plan (FTP) [AS-131]** sets out how future Travel Plans (produced every five years) are required to set ambitious Targets that are over and above those set out in the **GCG Framework [APP-218]**, set in consultation with stakeholders. In order to meet these Targets a number of measures will need to be implemented, which could include improvements to local public transport services such as bus and rail. The assessments of pollution (i.e. air quality, noise and greenhouse gas emissions associated with road traffic) also fully reflect the assumptions and outputs of the TA, in terms of the potential level of increase in traffic for the "reasonable worst case" scenario, and so are fully accounted for when

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			identifying the likely significant environmental effects in the Environmental Statement (ES). The assessments for air quality, noise and greenhouse gas emissions can be found in **Chapter 7 Air Quality [AS-076], Chapter 12 Greenhouse Gases [APP-038]** and **Chapter 16 Noise and Vibration [AS-080]** of the ES, with each chapter setting out where mitigation has been identified for the relevant environmental topic. Finally, it must be noted that there is no policy basis requiring the Proposed Development not to result in any net increase in vehicle trips, and policy recognises the need to balance the socio-economic benefits of growth at the airport with the management of the arising environmental impacts. It would not be possible to deliver the same socio-economic benefits without some increase in traffic, for which suitable mitigation is proposed.
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion	Ecology	6. Impact on Nature: We reject the application due to the potential negative impact on nature and wildlife. The proposed expansion would significantly disturb the delicate balance of nature in the Area of Outstanding Natural Beauty and the conservation areas of the Chiltern villages. The area is home to rare birds of prey, various owl species, rare butterflies,	The effects on biodiversity have been assessed and are reported in the **Chapter 8 of the Environmental Statement [AS-027].** There are no significant effects on biodiversity in the Chilterns AONB. An assessment of effects on the Special Qualities of the Chilterns AONB is being prepared, in consultation with Natural England, and the report

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RR-1406		wild orchids, ponds, the source of the river Ver, as well as Whipsnade Zoo, Whipsnade Tree Cathedral, and protected trees outside St Mary's Church in Kensworth These natural elements will be stressed and disrupted by the noise, pollutants, and airflows caused by the expanded airport operations. The suggested 2km zone of influence is inadequate considering the nature of an airport and the low-flying planes over residential and environmentally sensitive areas. Moreover, the increased traffic will impact areas beyond the 2km radius from the airport.	will be submitted to the Planning Inspectorate at an appropriate deadline for consideration during the Examination. The study areas and zones of influence considered in the biodiversity and cumulative assessments are described in ES **Chapter 8 [AS-027]** following accepted guidance and were agreed with technically competent consultees.
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion	Wigmore Valley Park	This doesn't even go into the details regarding the destruction of Wigmore Park, and all that it gives to the local community and natural world. This will be gone. Looking at the environmental assessments, they did not appear to be anywhere near as comprehensive as we assumed they should be, and this is telling but the amount of changes and additions they have recently made. However, there	A full and comprehensive Environmental Impact Assessment has been undertaken and the findings reported in the Environmental Statement, in compliance with the EIA Regulations. The area has been subject to numerous ecological surveys between 2017 and 2022 and is extensively characterised in the Baseline Ecology Report as part of **the ES [AS-033 and AS-034].**

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RR-1406		is a real necessity for the inspectorate to get a full independent assessment of all the environmental assumptions, as just from a lay person's view, surely the area should have been monitored over a full year, not just tiny snapshots, when much would have been missed.	
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Cost	7. Financial obscurity: We object to the application due to the lack of financial transparency and uncertainty regarding the returns on investment for LBC and Luton Rising. The absence of fully audited accounts from LBC since YE 2017/18 raises concerns about the value for money of this expansion. The substantial costs associated with the name change and presentation of the expansion (>£16m) raise further questions about its justification and feasibility. Luton Borough Council has provided loans exceeding £500m to Luton Rising and its previous form, yet the lack of audited accounts since 2017/18 leaves taxpayers uncertain of how this money has truly been utilised and what the returns have been. In addition looking at their statement of accounts, it appears that no auditors have been paid for the past 2 years.	Luton Borough Council's 2018/19 accounts are with the auditors for their final review and the Council's auditors have informed the Audit Committee that they intend to sign the accounts by the end of September 2023. The other audits cannot start until the 2018/19 audit is complete. The Government has acknowledged that there are a significant number of accounts in England which have yet to be audited and the whole local government audit regime requires a reset with new deadlines for completion of audit. DHLUC is expected to bring changes to the law in order to address this issue. The Council is in discussion with its auditors in order to ensure that the accounts are audited. This was discussed at the Council's Audit Committee, and they are working with their auditors to resolve this issue. Luton Rising's accounts are published for the period in question and are publicly available for

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		In contrast, while substantial funds have been allocated to Luton Rising for the airport, relatively small amounts have been invested in poverty alleviation, education improvement, and broader economic development in Luton. This raises questions about whether the council's pursuit of aggressive expansion has left behind the very people who ultimately fund it.	anyone to review to see how money loaned to the company by the Council has been used. Over the last five years (2017/18 – 2021/22) Luton Rising has, through its Community Funding Programme, donated £43.5m to local charitable organisations based or operating in Luton and the surrounding area. Luton Rising has maintained its commitment each year to supporting local charities even during challenging periods including Covid.
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Economic case and job creation	8. No apparent significant positive impact on local jobs: We object to the planning application as there are only estimated to be an increase in 0.6% of local population employed by the airport. The documentation has used actual numbers to try to make it look better, but percentages of the population show the impact is limited. There are spurious arguments listed regarding bringing jobs to the area, and the country would be better served by moving air traffic away from the over congested skies around London and the South East. There appears to be little real contribution the economy, much less the Luton economy with jobs from Luton	The proposed development will directly generate a large number of jobs locally, particularly in Luton itself, where the Borough is in need of employment. The job numbers cited in the representation relate only to direct jobs by place of employee residence. There will also be jobs created through the airport's supply chain and secondary rounds of spending. There will be wider economic benefits through attracting other activities to the local area due to improved air accessibility. This will act as an attractor to new industries locating within the area.

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		residents to the airport only estimated by the application to increase by 1,100 from 3,100 to 4,400, hardly a bonanza. This is only 0.5% of the estimated future Luton population! Unpicking some of these descriptions by Luton Rising in their documentation shows the obscurity the planners are using: see 2 examples below: 'As a result of the Proposed Development, the total operational employment supported by the airport in the Three Counties in 2043 is forecast to grow to 22,600 jobs, an increase of 6,100 jobs over 2019.' Documentation claims 'It is also 8,600 more jobs than would be supported by the Without Development Case in 2043. Surely encouraging new and better industries into the area be a far better way of increasing job opportunities to the local population?	The Applicant is satisfied that the job numbers cited are correct. Given that the area from which London Luton Airport draws its passengers is mainly local, there would be substantial disadvantages if those passengers were forced to use more distant airports, particularly in terms of longer surface access journeys leading to more congestion and more carbon emissions. It is preferable for demand to be met as close as possible to where it arises rather than forced re-distribution which would have negative economic and environmental consequences.

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SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Surface Access	9. Incomplete transport strategy means the planning case can't be looked at in the round: We object to the planning application due to the absence of a comprehensive transport strategy, which is currently labelled as 'emerging.' This lack of clarity prevents our community from fully evaluating the future impact of airport expansion, rendering the application incomplete and potentially invalid. We reject the application as there is no adequate transport planning in place to accommodate the anticipated influx of 32 million (+14m from current levels) passengers at the airport, nor is there concrete research of this on the potential impact on the surrounding population. Without a proper transport strategy, it is impossible to make an accurate assessment of the proposal.	The 'Emerging Transport Strategy' was produced for the 2022 consultation and is now replaced by the **Transport Assessment [APP-200 to APP-206]** which sets out the transport strategy to manage and mitigate the impact of the proposed Airport expansion. The Applicant sets out the assessment of the impacts of the increase in vehicle trips in the **Transport Assessment [APP-200 to APP-206]**, which is based on "reasonable worst case" assumptions. There is no policy basis requiring the Proposed Development not to result any net increase in vehicle trips, and policy recognises the need to balance the socio-economic benefits of growth at the airport with the management of the arising environmental impacts. It would not be possible to deliver the same socio-economic benefits without some increase in traffic, for which suitable mitigation is proposed. The Applicant has also prepared a **Framework Travel Plan [AS-131]** as part of the DCO application. Future Travel Plans that follow the structure and requirements set out in the **Framework Travel Plan [AS-131]** will have ambitious Targets that are over and above those set out in the **GCG Framework [APP-218]**, set in

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			consultation with stakeholders. In order to meet these Targets a number of measures will need to be implemented, which could include improvements to local public transport services such as bus and rail. A Sustainable Transport Fund is being delivered to ensure that any mitigation measures identified can be delivered and improvements in place to accommodate additional passengers.
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Need Case	10. Over-reliance on one company has risks: Government has also told LBC to reduce its dependence on the airport, this has history, the overreliance on the car industry had a devastating impact on Luton and Dunstable in past.	The Government instruction referred to was in fact a recommendation to Luton Borough Council, the Applicant is Luton Rising. Notwithstanding this, Luton Council's medium-term financial plan has removed dependence on dividend income from its airport subsidiary in accordance with the recommendation from the Department for Levelling Up, Housing and Communities.
SKWALE – Studham, Kensworth and Whipsnade Against Luton	Consultation	11. We reject this proposal as the Planning was not adequately advertised in our local villages, and thus there was not adequate consultation to the population of three local villages Kensworth, Studham and Whipsnade, all of which are in the direct and low flight path of Luton Airport. Indeed,	The pre-application consultation process comprised the following main stages: non-statutory consultation (25 June 2018 to 31 August 2018); 2019 statutory consultation (16 October 2019 to 16 December 2019); and 2022 statutory consultation (8 February 2022 to 4 April 2022.

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Airport Expansion RR-1406		although many of us responded to planning whenever it arises, usually very few are emailed when new planning issues arise (such as this) - I was notified by a friend rather than Luton Rising, which is concerning. 12. The initial form we had to fill in for the previous round of planning online, was problematic and not easy to manage for people and to some extents obstructive. This was admitted by the CEO of Luton Rising when I questioned him about it one to one at the 'Question Time' in Luton. In addition, once the form was filled in and uploaded, we did not get an email confirming the application had been received, so those who filled in the form have no record that it was done or that it would be looked at. 13. Inadequate publicity for this latest DCO application: We did not hear about this further DCO opening for discussion and registering as an interested person from Luton Rising or Luton Airport, but only by word of mouth. It has not been advertised adequately, and still there are many people	Informal stakeholder engagement has also been undertaken throughout the pre-application stage. Responses to all rounds of consultation have been carefully considered and used to inform the Proposed Development. Details of the 2018 non-statutory consultation, 2019 Statutory consultations and 2022 statutory consultation can be found in sections 2, 4 and 6 respectively in the **Consultation Report [AS-048]**. A variety of methods were used to publicise the 2022 statutory consultation including local press and radio adverts, posters sent to local community facilities and placed on local buses, newsletters were sent to approximately 350,000 properties within the vicinity of the airport, emails were sent to those on the mailing list, community groups and local businesses and the consultation was promoted on social media. A small number of locations on the edge of the Newsletter Mailing Zone, and residents in Dagnall, did not receive the newsletter at the start of the consultation. These properties were sent newsletters by first class post on 15 February and 24 February 2022 respectively. The Planning Inspectorate (by letter dated 27 April 2023) has accepted the DCO application and in

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		who do not know about this next stage of consultation.	doing so has confirmed that the consultation undertaken accords with the requirements of the Planning Act 2008 as set out in Chapter 2, Part 5 of the PA 2008. The **Consultation Report [AS-048]** explains how the Applicant has complied with the consultation requirements set out in the PA 2008, the Infrastructure Planning (Application: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations).
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Need Case	14. We reject the application as there appears no Real need for expansion – the Draft Need was one sided and did not present a properly balance or evidenced case. The strategies do not adequately reflect the post-Brexit, post-Covid economy. In addition, the impacts of the Climate Change Act do not appear to have been taken into account, and there is no comprehensive planning Statement.	The demand forecasts, as set out in the **Need Case [APP-213],** have been updated to reflect the most up to date economic data at the time of submission. This takes into account the effects of Brexit and the anticipated recover from the effects of the pandemic. The implications of the Climate Change Act have also been taken into account in line with the Government's Jet Zero Strategy (Ref 1) and the anticipated costs of carbon and/or its abatement are taken into account in the demand forecasts, resulting in demand growth being slower than would previously have been the case.

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SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Economic case and job creation	15. The argument for Economic Value does not stack up: The airport always seems to state that the reason for further expansion is for 'jobs and economic value', this argument was made in 2013, yet there will not be a significant boost in job numbers. The main reason behind this seemed to be more to do with securing a huge upfront cash windfall, which was used for the airport rather than helping alleviate the deprivation within LBC. There is one runway, so surely only one terminal is needed?	The detailed employment estimates are set out in **Appendix 11.1** of the Environmental Statement **[APP-079]**. The DCO proposition is to increase the future growth potential of the airport to accommodate up to 32 mppa. The economic case outlines the economic benefits of growth and the positive inherent economic consequences for employment and business growth in Luton and the surrounding areas as set out in Section 8 of **the Need Case [AS-125]**. To deliver on this expansionary growth will require investment in airport infrastructure which includes a combination of an expansion of the existing passenger terminal 1 and development of a second terminal in order to make best use of the existing runway in line with government policy. The 2014 planning permission was the result of an application by the airport operator made in 2012. That planning permission did not result in any form of 'huge upfront cash windfall' either to the Applicant or to Luton Borough Council.

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SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	Economic case and job creation	16. The fact that Luton is a priority for levelling up, is not relevant to the airport expansion. Luton Airport has expanded exponentially over the recent past, but Luton per se does not seem to have benefitted much, and remains a deprived area. The £600m+ that has been given to the airport by LBC over the past few years, could arguably have been used in a more beneficial way for the community, and had it done so, Luton may not be highlighted as being deprived. The financial obscurity around LBC and Luton rising is also worrying as no formal accounts have been signed off for the past 4-5 years, which rings alarm bells.	A total of £507m of loans has been provided to the Applicant from Luton Borough Council and have, in the main, been used to support the business's capital programme including projects such as Luton DART, Morton House and this application for Development Consent, and also to stabilise the company during the challenging period of the Covid-19 pandemic. The projects mentioned seek to boost economic activity in the area whilst contributing to the town's plans to reach net zero by 2040. All of the Applicant's statutory accounts up to March 2022 have been published and are available on the Companies House website. The Council's 2018/19 accounts are with the auditors for their final review and the Council's auditors have informed the Audit Committee that they intend to sign the accounts by the end of September 2023. The other audits cannot start until the 2018/19 audit is complete. The Government has acknowledged that there are a significant number of accounts in England which have yet to be audited and the whole local government audit regime requires a reset with new

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			deadlines for completion of audit. The Department for Levelling Up, Housing and Communities is expected to bring changes to the law in order to address this issue. The Council is in discussion with its auditors in order to ensure that the accounts are audited. This was discussed at the Council's Audit Committee and they are working with their auditors to resolve this issue. Ultimately, the Proposed Development is intended to support economic growth in Luton and the surrounding areas in support of the 'levelling up' agenda, reflecting the high levels of deprivation in Luton and other neighbouring areas, as set out in Section 4 of the **Need Case [AS-125]**
SKWALE – Studham, Kensworth and Whipsnade Against Luton Airport Expansion RR-1406	General	17. Excessive and incomprehensible documentation: We acknowledge that the current documentation for the Luton Airport expansion plan has grown to over 15,000 pages, with 1,538 pages dedicated to feedback on the 2019 consultation. The sheer length of this extensive documentation raises doubts about its validity and suitability for its intended purpose. It becomes challenging to comprehend and analyse such a vast	The Application comprises a large number of documents, organised within seven volumes. The purpose and contents of these seven volumes are described in the **Introduction to the Application [AS-002]**, with an accompanying **Application Document Tracker [AS-138]** listing each document and its Examination Library Reference Number. The Application documents were prepared in accordance with relevant requirements and guidance. Some draft documents were also shared

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		volume of information, leading to concerns about its accessibility and effectiveness. This marks the third consultation on the Luton Airport expansion within four years. By presenting the documentation in such an extensive manner, it seems that Luton Rising has made it difficult for everyone (particularly for the general public) due to lack the time and resources available to thoroughly review its contents. Despite my efforts, I have found no evidence within the documentation that disproves our concerns or adequately addresses them. This further strengthens our serious objection to the proposed airport expansion. For the points listed above and many others, we strongly object to the further expansion of Luton Airport, and believe that to expand would blight the lives of people who live and work in the area both in terms of their human rights, health and mental well-being.	with technical stakeholders, including local authorities and statutory undertakers, prior to submission in order to improve their accuracy and readability. A balance was sought in providing the necessary technical detail whilst also ensuring documents were written in a non-technical style and in plain English. As the application has now been submitted there is no requirement for further statutory consultation on the Proposed Development unless the Applicant proposes to make material changes to the Project during the Examination. This is not a consultation led by the Applicant, and is an examination led by the Planning Inspectorate and the Examining Authority, with opportunities for Interested Parties to participate. The airport is central to the local economy and is an important connectivity asset for the broader region it serves. It also supports regeneration and levelling up in Luton and neighbouring areas, where levels of deprivation are above average. To maintain its connectivity and significance across

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			the economic region, the airport must address its capacity constraints. Without additional capacity the airport will not be able to accommodate any further growth in demand in the future. This would limit its ability to support wider economic growth across the sub-region. The Proposed Development is being brought forward in the context of Government policy which supports airports making best use of their runways because of the economic benefits of air transport, as set out in the **Need Case [AS-125]**. The **Planning Statement [AS-122]** provides an assessment of the Proposed Development against relevant planning policy and other matters the Applicant considers are likely to be relevant to the Secretary of State's decision. A **Non-Technical Summary [APP-165]** was submitted with the application for development consent which provides a summary of the Environmental Statement in non-technical language.

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Hitchin Forum RR-0565	Noise and Vibration	Hitchin Forum Summary of Case Hitchin Forum opposes the granting of the DCO in respect of Luton Rising's proposal to increase passenger numbers to 32mppa by 2043. 1.The proposal will negatively impact Hitchin and its residents because • It will inevitably increase aircraft noise over Hitchin due to an increase in flights in a way that is unquantifiable at present (e.g. due to airspace changes over the course of the proposal) but which will reflect the increased noise impact in the immediate area of the airport.	The Proposed Development is being brought forward in the context of Government policy which supports airports making best use of their runways because of the economic benefits of air transport, as set out in the **Need Case [AS-125].** The airport is central to the local economy and is an important connectivity asset for the broader region it serves, including the Oxford-Cambridge Arc. It also supports regeneration and levelling up in Luton and neighbouring areas, where levels of deprivation are above average. To maintain its connectivity and significance across the economic region, the airport must address its capacity constraints. Without additional capacity the airport will not be able to accommodate any further growth in demand in the future. This would limit its ability to support wider economic growth across the sub-region. The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the

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			communities around the airport. As such, it has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the **GCG Explanatory Note [APP-217]** submitted as part of the application for development consent. Regarding environmental impacts associated with the Proposed Development, the Environmental Statement (ES) submitted with the application for development consent, provides assessments of a wide range environmental effects, including benefits and disbenefits. In particular, the impact of noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the ES [AS-080]**.

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			It will be for the Planning Inspectorate to consider the balance between the costs and benefits of the Proposed Development in providing its recommendation to the Secretary of State, based on the evidence submitted with the application.
Hitchin Forum RR-0565	Surface Access	It will increase traffic through Hitchin which is already congested. The area most likely to be impacted by the proposals - the A602/A505 corridor - is subject to Hitchin's two active Air Quality Management Areas	The Applicant undertook traffic modelling as part of the **Transport Assessment [APP-203 to APP-206]** which demonstrates that the proposed highway improvements would mitigate the traffic impacts from the Proposed Development. There is not predicted to be a worsening of the existing traffic conditions.
Hitchin Forum RR-0565	Landscape and Visual	It will further degrade the amenity value of the Lilley Bottom area of North Hertfordshire, both as a result of noise due to overflights, and additional traffic on roads which are unsuitable for significant traffic.	A full Environmental Impact Assessment has been undertaken and the findings are reported in the Environmental Statement submitted as part of the application for development consent; including **Chapter 7 Air Quality [AS-076]**, **Chapter 14 Landscape and Visual impacts [AS-079]** (which includes consideration of tranquillity), **Chapter 16 Noise and Vibration [AS-080]**, **Chapter 18 Traffic and Transport [AS-030]**, and **Chapter 13 Health and Community [AS-078]**.
Hitchin Forum RR-0565	Sustainability	The proposal is not sustainable. In the National Planning Policy Framework, sustainable development is defined as 'Development that meets the needs of the	The development is considered sustainable development having regard to the tests set out in the National Planning Policy Framework (NPPF) (Ref 7) as described in the **Planning**

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		present without compromising the ability of future generations to meet their own needs'. We believe the proposal fails to meet the criteria for sustainable development in that it • Is based not on present need, but on the assumption of a continued ever-increasing demand for cheap international flight which is mainly for the leisure purposes (the 2018 Civil Aviation Authority survey found only 11% of passengers at Luton were flying for business purposes, the remainder for leisure) in the process off-shoring the tourist revenue that might otherwise accrue to the UK economy.	**Statement [APP-194]**, which sets out the planning balance. It is Government policy that airports should be allowed to grow to meet both current and future demand. The most recent Government policy is summarised in Section 3 of the **Need Case [AS-125]**. In particular, it is clear that Government recognises the importance of global connectivity for UK residents as well as inbound visitors (see Need Case paragraphs 3.3.48-3.3.51). In 2019, 13% of passengers were travelling for business purposes (Need Case Figure 5.9). Although the majority of passengers using London Luton Airport are travelling for leisure purposes, a high proportion of these passengers are foreign resident inbound visitors and of the UK resident leisure passengers, over half were visiting friends and relatives abroad. The implications of outbound tourism are considered at paragraph 8.5.19 of the Need Case but further consideration was scoped out of the environmental assessment at the Scoping stage.
Hitchin Forum RR-0565	Health and Community	Compromises the ability of present and future generations of local residents to meet their own needs by damaging their health and wellbeing (through noise, traffic	A full Environmental Impact Assessment has been undertaken and the findings are reported in the Environmental Statement submitted as part of the application for development

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		congestion and poor air quality) and reducing the tranquillity of a high quality area of countryside which is valued for its recreational benefits.	consent; including **Chapter 7 Air Quality [AS-076]**, **Chapter 14 Landscape and Visual impacts [AS-079]** (which includes consideration of tranquillity), **Chapter 16 Noise and Vibration [AS-080]**, **Chapter 18 Traffic and Transport [AS-030]**, and **Chapter 13 Health and Community [AS-078]**.
Hitchin Forum RR-0565	Need Case	Perpetuates the disproportionate reliance of the local economy on aviation which is vulnerable to shocks such as Covid 19, ignoring the need for diversification.	Government policy, as set out in *Flightpath to the Future* of May 2022, is clear that the air transport sector is seen as an economic asset for the whole of the UK and in particular that *"Airports have a key role to play in boosting our global connectivity and we continue to be supportive of sustainable airport growth."* Air transport accessibility is a key enabler of economic diversification as explained in Section 2 of the **Need Case [AS-125]**. Flightpath to the Future (Ref 4) also stresses the local benefits of aviation and the contribution that contribution that airports can make in providing jobs and supporting local economic activity (see paragraph 3.3.54 of the Need Case). The benefits of the Proposed Development are set out in Section 8 of the Need Case.
Hitchin Forum RR-0565	Climate Change	Facilitates the continued increase in scope 3 in-flight carbon emissions (over which	This comment is noted. Carbon emissions from flights in **Chapter 12 Greenhouse**

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		Luton Rising claims to have no control) and which is of ever increasing concern given the recent announcement that we are likely to see the 1.5oC rise in average global temperatures reached in the next 5 years.	**Gases of the ES [APP-038]** are modelled on the Jet Zero Strategy High Ambition scenario (Ref 1) that represents current UK Government policy on aviation. The UK government has set a legally binding target, under section 1 of the Climate Change Act 2008, to achieve net-zero greenhouse gas emissions by the year 2050 and to meet their 5-yearly carbon budgets. It has introduced a range of measures to control carbon. For example, the Jet Zero Strategy is the government strategy on how aviation will contribute to meeting the UK's climate change commitments. Paragraph 3.57 sets out that "we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth". The modelling behind the Jet Zero Strategy (and the update) incorporated growth at Luton in its assumptions at the same level as that proposed by the Application. The UK Emissions Trading Scheme and the Carbon Reduction Offsetting Scheme for International Aviation are other tools to control carbon emissions.

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			The greenhouse gas scope 3 emissions from aviation at Luton airport will be managed and capped by the UK Emissions Trading Scheme (UK ETS) within the European Economic Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). UK ETS sets an overall, scheme-wide cap on the amount of carbon which may be emitted by operators, including participating airlines. The available allowances place a cap on the total amount of GHG emissions that can be emitted by sectors, including aviation, covered by the UK ETS. This cap will be reduced over time stimulating innovation by participants to increase the carbon efficiency of their operations, or indeed to take steps which would reduce the overall scale of their operations. This effectively puts a binding cap on the amount of GHG emissions the aviation sector can emit. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050.

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			CORSIA works alongside other measures to offset CO2 emissions that cannot be reduced through the use of technological improvements, operational improvements, and sustainable aviation fuels (SAF) with emissions units from the carbon market. CORSIA aims to ensure that international aviation's net carbon emissions do not increase from 2020 levels. Participating airlines are required to monitor their emissions and report them to their respective national authorities. These authorities verify the reported emissions and ensure compliance with CORSIA regulations. Currently the scheme is voluntary and serves as a pilot phase. From 2027 onward, all eligible international flights will be required to offset their emissions above the baseline level.
Hitchin Forum RR-0565	Need Case	Would be vulnerable to any changes in government policy (with regard to scope 3 in-flight carbon emissions, for instance) and market forces over the period covered by the plans, reducing the demand for air travel so that the expanded airport becomes unviable, leaving Luton and its neighbours blighted by an inefficient	The demand forecasts underpinning the Proposed Development have taken into account both potential economic uncertainties and also the increased costs of carbon/carbon abatement as explained in Section 6 of the **Need Case [AS-125]**.

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		concrete stranded asset, too expensive to modify, demolish or maintain.	
Hitchin Forum RR-0565	Green Controlled Growth	3. Green Controlled Growth will be ineffective in preventing harmful impacts. Unless otherwise stated, paragraph numbers in this section refer to document 7.07 GREEN CONTROLLED GROWTH FRAMEWORK EXPLANATORY NOTE Luton Rising's Green Controlled Growth Strategy continues to prioritise growth in passenger numbers whilst being ineffective in preventing harmful environmental impacts. Action to halt expansion is dependent on limits being breached in four areas. We will focus on flight noise and air quality due to increased surface access in our final detailed submission. For the purposes of this preliminary submission we will illustrate our argument with respect to aircraft noise during operation where necessary. Paragraph 1.4.13 sets out the principle of the mechanism by which impacts will be controlled: 'By including Level 1 and Level 2 Thresholds in the GCG Framework, growth will be required to be planned, and steps to be taken before a Limit is reached, with the ultimate intention that this early action avoids the Limit being	The GCG Limits are aligned to the assumptions/forecasts relating to the assessment of the reasonable 'worst-case' scenario assessed within the ES. As set out in Section 1.4 of the **GCG Framework Explanatory Note [APP-217]**, the GCG Framework is not intended to replace or substitute the need for environmental mitigation measures associated with the Proposed Development and identified by the EIA process. The intention of the GCG Framework is to provide additional certainty that the environmental effects forecast will not be exceeded irrespective of the performance of the up-front mitigation measures secured through the DCO and set out in the **Mitigation Route Map [AS-047]** by making future growth dependent on achieving the environmental performance forecast at the time of the DCO. The application will be assessed on basis of the likely significant environmental effects arising in this reasonable worst-case scenario, as identified by the ES. It is necessary that the Limits are not set arbitrarily, but are aligned with this scenario (which itself is part of the

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		exceeded. By taking this proactive approach, it will ensure that the plans for growth are adjusted in response to the prevailing circumstances at the time, rather than waiting for a problem to occur and then reacting.' 3a. Limits and thresholds are set too high and close together: there will be a time lag after damaging impacts have occurred before any action to halt growth is taken	comprehensive forecasting process that underpins the EIA and that is fully evidenced in the Environmental Statement). The Limits do not represent a target level of environmental performance. Instead, they represent the maximum impact considered acceptable, that provides certainty that identified likely significant environmental effects (when allowing for the proposed mitigation) will not be exceeded. Where a Limit is breached, growth would be required to stop and a Mitigation Plan developed and implemented. A range of other measures are also in place to improve environmental performance and reduce environmental effects, such as the **Framework Travel Plan [AS-131]**, which requires mode share targets to be set that are more ambitious than the GCG Limits. The approach to the setting of Thresholds has considered the need to ensure sufficient early warning will be given to prevent a breach of Limit, balanced with the need to ensure a proportionate approach to monitoring, reporting, and implementation of mitigation takes place when environmental effects

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			increase. The Thresholds represent an early warning for the operator and the ESG, indicating that environmental impacts are exceeding the expected operational levels and approaching that of the worst-case scenario set out previously, which cannot be exceeded. For the Thresholds to effectively indicate that a Limit may be breached (which might indicate the need for preventative mitigation to be implemented), they must represent a proportion of the difference between the expected operational impacts and the Limit. Lower thresholds would be less meaningful, where they would consistently be exceeded even when the airport was operating as forecast, or proportionally much closer to the forecast than the Limit. For some environmental effects (principally noise), the airport is forecast to be operating at a level where the difference (in absolute terms) between the expected environmental impact and the Limit is not as large as for other effects. The operator is aware of this decreased margin for error and a unique approach on noise is taken within the GCG Framework.

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			As stated in the **GCG Framework Explanatory Note [APP-217]**, noise is the only environmental topic within GCG that has Limits explicitly linked to time (as opposed to passenger throughput) with Limits, Thresholds and periodic review cycle aligned with the 5-year Noise Action Plan cycle. Once the DCO is granted and implemented, the airport operator will also review, and as necessary update, the noise forecasts every five years, in line with the Noise Action Plan cycle. This is an additional, proactive step that must be taken even before any Thresholds or Limits have been exceeded, where additional processes then respond to the annual monitoring information reported in the Monitoring Report. By effectively planning over a longer horizon, in line with GCG Limits, the forecasts will support the airport operator working with the airlines to plan their growth and fleet deployment at the airport in line with the Noise Envelope. This ultimate aim of this proactive approach is to avoid the breach of a Limit in the first place.

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			With regard to the potential time-lag, this is acknowledged and accepted and is a function of the existing legislation and guidance related to slot allocation that the GCG Framework must fit within, and which cannot be amended by the Proposed Development. It is important to note that the timings provided in the **GCG Explanatory Note [APP-217]** are worst case and represent the latest possible points in time at which aspects of the GCG process need to be completed in order to influence the summer season capacity declaration for the following year. The timing of the airport's capacity declaration is fixed and cannot be amended by the Proposed Development through the Draft DCO. Furthermore, as illustrated in Figure 2.10 of the **GCG Framework Explanatory Note [APP-217]**, based on the availability of monitoring results, it is evident that performance against the Limits in one calendar year cannot inform the capacity declaration for the following year, which will already have taken place before the noise performance in the current summer season is known; rather, the absolute minimum lag is two summer seasons.

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			The GCG timings have therefore been established to balance this deadline with the time needed for the airport operator to collect, process and report on monitoring data and the need to allow time for scrutiny of monitoring results (including by the public. Nevertheless, the **Appendix B** to the **Green Controlled Growth Framework (ESG Technical Panels Draft Terms of Reference) [APP-220]** sets out that monitoring data should be submitted to the relevant Technical Panels as soon as reasonably practicable. Furthermore, there is nothing within the GCG Framework that would prevent the airport operator from implementing mitigation at the airport as soon as they are aware there is a risk of a Threshold or Limit being exceeded. Given the implications of a Level 2 Threshold or Limit being exceeded are significant, it is in the airport operator's interests to address any potential breaches as soon as possible to avoid ongoing constraints on growth.
Hitchin Forum RR-0565	Green Controlled Growth	• Para 1.2.5 of the Green Controlled Growth Framework states 'Note that while the Phase 1 is the point at which commercial throughput reaches 21.5 mppa,	As set out in ES **Chapter 5 Approach to Assessment [AS-075]**, the environmental impact assessment is required to assess a reasonable 'worst-case' scenario in order to

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		the value of the Limit for this phase is based on the faster growth case, which assumes a passenger throughput of 23 mppa and which represents a 'reasonable worst case'. That a 'reasonable worst case' is regarded as acceptable implies the relative priority given to growth compared to environmental damage. • Para 3.1.10 also demonstrates that this approach ensures that growth is prioritised and therefore impact will be maximised during each phase of development.	identify the likely significant environment effects. It is on the basis of the identified environmental effects (including proposed mitigation) reported in the ES that the application for development consent will be assessed against, and the DCO made or refused. By aligning the GCG Limits at levels consistent with the reasonable worst case scenario, this ensures that the forecast likely significant environmental effects will not be exceeded (once mitigation has been implemented). If the assumptions that form part of this reasonable worst case scenario do not materialise in practice (for example, a slower rate of passenger growth, allowing a greater percentage of the aircraft fleet to transition to quieter aircraft), then environmental effects would be lower. Notwithstanding this, it is recognised that there needs to be a mechanism in GCG to ensure that the opportunity to reduce environmental effects from aircraft noise below those associated with the reasonable worst-case scenario is available, where circumstances allow. This is why a mandatory review of the GCG noise Limits is specified to take place every 5 years within the GCG Framework

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			(from 2039 onwards), with a view to reducing them where reasonably practicable. This review process is set out in Section 3.3 of the **GCG Framework [APP-218]**.
Hitchin Forum RR-0565	Green Controlled Growth	• The relationship between limits and thresholds in table 3.1 is misleading. Note 3 explains that, rather than threshold 1 being 90% and threshold 2 being 95% of the limit (as might reasonably be assumed) the actual values are percentages of the differences between the areas of the 'do nothing' and 'do something' contours. Thus both threshold values are closer to 98% or even 99% of the limit, with little difference between the threshold and the limit. • These thresholds may therefore be so close to the limits that any actions triggered by exceeding them will already be too late to prevent a breach of the limit.	By including Level 1 and Level 2 Thresholds in the GCG Framework, growth will be required to be planned, and steps to be taken before a Limit is reached, with the ultimate intention that this early action avoids the Limit being exceeded. By taking this proactive approach, it will ensure that the plans for growth are adjusted in response to the prevailing circumstances at the time, rather than waiting for a problem to occur and then reacting. The approach to the setting of Thresholds has considered the need to ensure sufficient early warning will be given to prevent a breach of Limit, balanced with the need to ensure a proportionate approach to monitoring, reporting, and implementation of mitigation takes place when environmental effects increase. The thresholds represent an early warning for the operator, indicating that environmental impacts are significantly exceeding the expected operational levels and approaching the worst-case scenario level, which cannot be exceeded. For the

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			Thresholds to effectively indicate that a Limit may be breached (without preventative mitigation), they must represent a proportion of the difference between the expected operational impacts and the Limit. Lower thresholds would be less meaningful, where they would consistently be exceeded even when the airport was operating as forecast, or proportionally much closer to the forecast than the Limit. It is accepted that the Level 1 and Level 2 Thresholds are set close to the GCG noise Limits, but this is necessarily so, as the airport is forecast to be operating at a level where the difference (in absolute terms) between the expected environmental impact and the Limit is not as large as for other effects. The operator is aware of this decreased margin for error and a unique approach on noise is taken within the GCG Framework. Forward planning is key to avoiding breaches as much as the retrospective annual compliance monitoring and reporting required by GCG. To support this, once notice has been served to implement the Proposed Development under Article 43(1) of the DCO,

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			the airport operator will adopt the AEDT noise model used to prepare the Environmental Statement. This 'DCO noise model' will then be maintained and used 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'). Once notice has been served under Article 43(1), the airport operator will review, and as necessary update, the noise forecasts every five years, around the mid-point of each five-year period (e.g. 2027, 2032, 2037 etc). This will support preparation for the following five year-period and, as necessary, any Level 2 Plan or Mitigation Plan required by the GCG Framework. This is an additional, proactive step that must be taken even before any Thresholds or Limits have been exceeded, where additional processes then respond to the annual monitoring information reported in the Monitoring Report. By planning over a longer horizon, in line with the noise Limits set out in the GCG Framework Limits, the forecasts will support

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			the airport operator working with the airlines to plan their growth and fleet deployment at the airport in a way that would avoid breaching the Limits.
Hitchin Forum RR-0565	Green Controlled Growth	• Due to the retrospective nature of the necessary analysis and the publication of the annual report, it is likely that slots will have been allocated for the next year. Effectively, those living within the enlarged contours will have been subject to excessive noise for 2 years, even if growth is ultimately halted, which is not guaranteed. The time lag is admitted in para 2.3.9, which effectively contradicts the claim in Paragraph 1.4.13 quoted above 'Based on the availability of monitoring results, it is evident that performance against the Limits in one calendar year cannot inform the capacity declaration for the following year; rather the minimum lag is two summer seasons'. • There is potential for further delay in that the airport can appeal the process and contend that the breach is due to circumstances beyond its control.	The intent of the GCG Framework is to avoid any breaches of the Limits in the first-instance. The potential time-lag is acknowledged and accepted and is a function of the existing legislation and guidance related to slot allocation that the GCG Framework must fit within. It is also important to note that the timings provided in the **GCG Explanatory Note [APP-217]** are worst case and represent the latest possible point at which aspects of the GCG process need to be completed in order to influence the summer season capacity declaration for the following year. There is nothing within the GCG Framework that would prevent the airport operator from implementing mitigation at the airport as soon as they are aware there is a risk of a Threshold or Limit being exceeded. Given the implications of a Level 2 Threshold or Limit being exceeded are significant, it is in the airport operator's interests to address any potential breaches as

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			soon as possible to avoid ongoing constraints on growth.
Hitchin Forum RR-0565	Green Controlled Growth	3b. Scrutiny of the GCG process will lack independence and will therefore be insufficiently robust. Much depends on the effectiveness of the apparently independent Environmental Scrutiny Group. Luton Rising claims that this is not '..marking its own homework'. To extend the metaphor, we believe that Luton Rising and the airport operator intend to choose the examiners, write the mark scheme and determine the pass/fail borderline. They reserve the right to contest, and ignore, any recommended corrective actions which get in the way of growth.	The development of the GCG Framework has taken place through engagement with a range of stakeholders including local authorities impacted by the Proposed Development. The proposed approach to GCG was also set out as part of the 2022 Statutory Consultation, which included the proposed membership and functioning of the ESG. Changes have been made in response to this feedback, and the framework will be subject to further independent scrutiny throughout the DCO examination. Ultimately, the decision on whether to grant the DCO will be made independently of the airport, and the appropriateness of the GCG Framework in controlling the environmental effects of the Proposed Development will be a significant consideration in that decision. The airport operator does have a right to appeal, but only in circumstances where the ESG or Technical Panels are considered to have acted unreasonably, or outside the defined GCG processes. Paragraph 37 of

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			Schedule 2 of the **Draft Development Consent Order [AS-005]** sets out the proposed circumstances and process for appeals by the airport operator to the Secretary of State for Transport. Ignorance of corrective actions recommended by the ESG in their function of either providing commentary on a monitoring report or refusing a Mitigation Plan will have significant implications on the growth of the airport due to the GCG Framework. Ignorance of recommendations from monitoring report commentary may lead to a breach of a Limit or, where a Mitigation Plan has been submitted, will result in continued restriction of airport growth until such a point that a Mitigation Plan is accepted by ESG.
Hitchin Forum RR-0565	Noise Envelope	3b(i) Luton Rising has a history of seeking to limit consultation and to ignore stakeholder concerns. Luton Rising's approach to the work of consultation and independent groups is exemplified by the way in which it treated the proposals from the Noise Envelope Design Group (NEDG). The Operational Noise Management (Explanatory Note) Appendix B of Noise Appendix 16.2 provides examples of the	The Applicant has conducted three consultations, including two statutory consultations, about its proposals. The **Consultation Report [AS-048]** outlines how all consultation feedback has been analysed and carefully considered for the improvement of the project. The Noise Envelope proposals have been developed in consultation with the Noise

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		limitations of both the consultation on the NEDG's report and the way the airport treats community concerns expressed in such consultations. For example • It constrained public consultation on the NEDG's report by accepting comments on just part of a draft report which was only circulated to a limited number of possible respondents. The section of the report was described as 'confidential', effectively suppressing any discussion within a community group. • The focus of the consultation was unclear to the extent that respondents were unsure whether they were commenting on the Noise Envelope (NE) design process or on the Green Controlled Growth proposals. Luton Rising has decided to ignore stakeholder concerns by insisting on incorporating NE design into its GCG proposals.	Envelope Design Group (NEDG) and has taken regard of their recommendations. The Noise Envelope Design Group contains representatives from industry, community groups, local authorities and independent experts. The membership of the NEDG is described in Section 16.4 of **Chapter 16 Noise and vibration of the ES [AS-080]**. Engagement with the NEDG is also described in the NEDG Final Report (see Annex A of **Appendix 16.2 of the ES [APP-111]**). A total of 19 meetings have been held with the NEDG between 2019 and 2022. This engagement is summarised in Section 16.4 of **Chapter 16 Noise and vibration [AS-080] of the ES**. Throughout this process, community groups have been represented in the NEDG by the Luton and District Association for the Control of Aircraft Noise (LADACAN) representative and, whilst they were active, the London Luton Airport Town and Village Community Committee (LLATVCC, now disbanded). As part of the NEDG terms of reference, this representation was on behalf of all community groups. The NEDG worked with the LADACAN representative to enable draft proposals to be shared and commented on by other

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			established community groups. Documents were marked as confidential to as they were under development and were not intended to be distributed wider than as agreed with the NEDG. The Applicant is pleased to note that there are a large number of recommendations from the NEDG that have been accepted and adopted in the Noise Envelope proposals. Whilst the Applicant has carefully considered all of the recommendations from the NEDG, there are some recommendations which have not been adopted, and in such cases the Applicant has developed alternative proposals based upon relevant best practice, guidance and policy. A summary of the NEDG recommendations and the Applicant responses are provided in Annex B of **Appendix 16.2 of the ES [APP-111]**. As set out in **Appendix 16.2 of the ES [APP-111]**, the design and content of the Noise Envelope is not affected by its inclusion within the GCG Framework, and it is considered that the benefits of integration outweigh the additional 'visibility' of having a standalone Noise Envelope. The key advantages of

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			integrating the Noise Envelope within the GCG Framework are that the enforcement, control and reporting processes set out within GCG will automatically apply to the Noise Envelope, avoiding the need for duplication of processes and enforcement bodies and providing consistency across the four topics covered by the GCG Framework (noise, air quality, carbon and surface access). The GCG noise Technical Panel that would be formed under the GCG Framework allows for suitable independent technical expertise to be involved in the review and enforcement processes without the need for separate arrangements to those in GCG for a stand-alone Noise Envelope.
Hitchin Forum RR-0565	Noise Envelope	• Community groups argued for several metrics to define the NE. Luton Rising has chosen to ignore these concerns, weakening the NE design and leaving open the possibility that noise from increased flights outside the summer period will not be taken into account in assessing noise impact.	The Applicant worked closely with the NEDG and considered carefully all the recommendations made. As recorded in Annex B of **Appendix 16.2 of the Environmental Statement [APP-111],** NEDG recommendations have not been ignored and the majority have been accepted. Paragraph 1.3.14 of Annex B notes "…*all of the indicators recommended in the NEDG Interim Report are included in the GCG Framework, either as Thresholds and Limits or within the Aircraft Noise Monitoring Plan (Appendix C of the*

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			Green Controlled Growth Framework [TR020001/APP/7.08]) to inform community engagement and airport noise management". Paragraph 1.3.15 of Annex B of **Appendix 16.2 of the Environmental Statement [APP-111],** covers four indicators (three of which are annual' indicators) that NEDG has asked the Applicant to include in the setting Limits as part of the Noise Envelope. Paragraphs 1.3.16 to 1.3.27 of Annex B sets out why the Applicant has not included these four further indicators request by NEDG as Limits but have been included in the Aircraft Monitoring Plan. Of particular relevance are paragraphs 1.3.22 and 1.3.23 of Annex B of **Appendix 16.2 of the Environmental Statement [APP-111],** which note that research and guidance from the Civil Aviation Authority (Ref 12, Ref 13) which concludes that the $L_{Aeq,16h}$ and $L_{Aeq,8h}$ metrics are those that best correlate with noise and health effects. As such, these noise metrics have been used to define Limits in the Noise Envelope.
Hitchin Forum RR-0565	Noise and Vibration	• Luton Rising accepted the benefits of accelerated growth between 2014 and 2019 with no attempt to share them with	The Applicant is committed to sharing the benefits of future technological improvements (in terms of aircraft noise reduction) between

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		those adversely affected, and has no intention to address the issue retrospectively. It is unsurprising that community groups question its intention to share such benefits that accrue in the future, especially as any mechanism for doing so has not been explained	communities and industry. The benefit of the transition to 'new generation' aircraft (e.g. the Airbus 320Neo and 321Neo and the Boeing 737Max) in the early years of expansion (phase 1) will be shared with the community, with the Noise Envelope Limits to be set at commensurate levels to secure this. For the later years of expansion (phase 2 and onwards), The Noise Envelope includes a defined mechanism to share the noise reduction benefits of future technological improvements in aircraft between the airport and local communities. This would be controlled through a requirement to review the Limits and Thresholds in 5-year cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance known. See the **Green Controlled Growth Explanatory Note [APP-217]** for further information.
Hitchin Forum RR-0565	Noise and Vibration	• The insistence on the use of 2019 contour areas (achieved as a consequence of a breach of previously agreed planning controls) as a baseline is further evidence of Luton Rising's bad faith	As described in **Chapter 16 of the Environmental Statement [AS-080]**, the Applicant has undertaken an assessment of EIA likely significant effects by comparing the situation with the Proposed Development (the Do-Something scenario) to the situation without the Proposed Development (the Do-

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			Minimum scenario) in each assessment year. The future air noise baseline (the Do-Minimum) is compliant with the airport's current consented long term noise limits in each assessment year and therefore demonstrates a scenario where the airport is operating within its currently consented noise limits. Forecast noise exposure with the development is also compared to the 'current baseline' which is considered to be the actual noise levels in 2019, in line with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (which refers to the baseline scenario as "a description of the relevant aspects of the current state of the environment" in Schedule 4, paragraph 3). However, a sensitivity test using a '2019 Consented' baseline (derived for this purpose by adjusting the fleet mix that occurred in 2019 to reach a modelled noise impact that would sit within the existing 2019 short term Limits) is summarised in **Chapter 16 Noise and Vibration of the ES [AS-080]**. An assessment against both the 2019 Actuals and 2019 Consented baseline has therefore

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			been undertaken. The conclusions of residual significant effects remain the same for both assessments, as significant effects would be avoided through the provision of the full cost of noise insulation.
Hitchin Forum RR-0565	Noise Envelope	• Community groups pointed out that an obvious way in which Noise Envelope design could be tested is to assess whether it would have prevented the noise breaches during the period of 2017-2019. Luton Rising has not carried out such an assessment.	The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) has been designed to improve upon the existing noise control regime and to effectively prevent breaches from occurring. **Appendix 16.2 Operational Noise management (Explanatory Note) of the ES [APP-111]** sets out how the proposed Noise Envelope contains mechanisms that should have avoided the noise Limit breaches that occurred at the airport from 2017-2019. This is further elaborated on in the **Comparison of consented and proposed operational noise controls document [AS-121]** which provides a direct comparison between the current and proposed operational noise controls, noting that the Noise Envelope provides several enhancements to the current consented noise controls, such as independent scrutiny and oversight, increased transparency, adaptive mitigation and management plans and noise limit reviews.

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Hitchin Forum RR-0565	Green Controlled Growth	3b(ii) The Environmental Scrutiny Group (ESG) will not be independent and have a restricted remit. Paragraph numbers in this section refer to document 7.08 GCG FRAMEWORK APPENDIX A: DRAFT ESG – TERMS OF REFERENCE The following are some of the provisions which will result in the ESG being subject to pro-airport bias with only second-hand knowledge of the day-to-day impact of the development • Para A2.1.5 makes it clear that Luton Rising and the airport operator may attend the ESG and make representations. • Paras A2.1.7 to A2.1.12 specify how the chair of the ESG will be appointed. The airport operator / Luton Rising control the appointment. They provide the shortlist of suitably qualified candidates to the Secretary of State. If the latter fails to make a decision within 56 days, the airport operator / Luton Rising choose a candidate. They specify the term of office, and if the chair is unable to attend, any substitute must be acceptable to them • Para A2.1.1 In addition to the chair, an independent aviation specialist and a representative of an aviation industry body, representatives of a number of District and	Luton Rising and the airport operator would be permitted to attend meetings of the ESG solely in order to aid the functioning of the group, as the ESG members will not be familiar with the day-to-day operations at the airport. Crucially, the airport operator and Luton Rising are not proposed to be members of the ESG, and hence have no voting rights where decisions must be made. Whilst the airport operator will identify the proposed chairperson, ultimately the appointment of that Chairperson is decided by an independent third party (the Secretary of State). The provision relating to a decision being required within 56 days is solely to prevent undue delays to the establishment of the ESG, which requires a Chairperson to function. If approved, the DCO would authorise growth subject to the requirements and obligations imposed on the Applicant. Compliance with the GCG Framework would therefore be a technical matter, not a political one, to ensure the relevant requirements and obligations are being discharged. The representatives of local authorities are therefore required to be

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		Councils are mentioned. These representatives are to be unelected officers, thereby ensuring that the voices of those directly impacted will not be heard. • Para A2.3.3 enshrines the airport operator's right of appeal against decisions made by the ESG. • Para A3.2.2 The ESG must accept the principle of the growth consented at the airport under the DCO and their functions shall be limited to considering how such growth aligns with the Limits. In summary. The proposals will negatively impact Hitchin and its residents.	planning professionals on the basis they are discharging planning functions related to the implementation of the DCO. The views of local communities will be obtained through the public meetings mandated as part of the GCG Framework, and the ESG are required to account of this feedback where relevant when making decisions, as set out in Section A4.6 of the **Draft ESG Terms of Reference [APP-219]**.
Hitchin Forum RR-0565	Green Controlled Growth	They are unsustainable according to the commonly accepted definition of the term. Luton Rising seeks to use what it asserts is an innovative strategy – Green Controlled Growth (GCG) to control environmental impacts. We believe GCG will be ineffective because it is predicated on a predetermined plan to achieve maximum passenger and flight numbers as rapidly as possible. To this end its procedures will ensure that any remedial measures (such as reduction in flights) will lag the damage to the environment that they are apparently designed to prevent. Its oversight body, the Environmental Scrutiny Group, whilst	The determination of the application for development consent by the Secretary of State will need to weigh up the balance of socio-economic benefits derived from the Proposed Development, and (amongst other things) the environmental impacts associated with it. The GCG Framework has been developed to ensure that the identified environmental impacts will not be exceeded, while still delivering the socio-economic benefits associated with expanding the airport. The intent of the framework is one of prevention, to ensure that breaches do not occur in the first place, and it is accepted that there is a potential lag relating to the timing of

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		ostensibly independent, will allow little direct representation from those most directly affected by increased flights. Luton Rising will effectively have power of veto over the ESG's membership."	the airport's capacity declaration, which is fixed and cannot be modified by the DCO. There will be direct representation of those affected by increased flights as the ESG is proposed to include representatives of Central Bedfordshire, Council, Hertfordshire County Council, Luton Borough Council and North Hertfordshire District Council. Further to this, and specifically relating to noise, the GCG Noise Technical Panel would include representatives of Stevenage Borough Council and Dacorum Borough Council (who are not represented on ESG) due to the specific noise impacts they would experience. Section A4.6 of the **Draft ESG – Terms of Reference (Appendix A to the GCG Framework) [APP-219]** also outlines the procedure for the ESG to take account of public feedback. This includes the organisation of a public meeting, to be held at least 14 days in advance of submission of a Monitoring Report to the ESG, for each environmental topic in scope of GCG. A summary of the topics and issues raised at these meetings will be prepared by each Technical Panel within 7 days of the meeting and will form part of the

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			Monitoring Report subsequently submitted to the ESG by the airport operator. Furthermore, where the ESG is providing comments on a draft Level 2 Plan or draft Mitigation Plan, these comments must include detail on how public feedback on the relevant Monitoring Report (that shows an exceedance of a Level 2 Threshold or breach of a Limit) has been taken into account insofar as this is relevant to the Plan on which it is commenting.
Luton Friends of the Earth RR-0879	General	"FoE registration to object – summary Development Consent Order by Luton Council to expand from 18 to 32 million passengers during an accelerating Climate and Nature Emergency Luton Friends of the Earth's registration to object 20 Jun 2023 Your video says "the purpose of the NSIP process is to weigh local impacts against national need for such infrastructure, in a fair, open and impartial manner." It is our strong view that approving the application would have devastating adverse local impacts, and be against national (and international) need. It is incomprehensible to us that, following the inquiry in autumn 2022, this DCO has been accepted for yet further debate, when	The Proposed Development is being brought forward in the context of Government policy which supports airports making best use of their runways because of the economic benefits of air transport, as set out in the **Need Case [AS-125].** The airport is central to the local economy and is an important connectivity asset for the broader region it serves, including the Oxford-Cambridge Arc. It also supports regeneration and levelling up in Luton and neighbouring areas, where levels of deprivation are above average. To maintain its connectivity and significance across the economic region, the airport must address its capacity constraints. Without additional capacity the airport will not be able to accommodate any further growth in demand in

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		catastrophic impacts of expanding aviation (the fastest growing source of climate emissions) both locally and nationally have already been clearly demonstrated. The Govt Climate Change Committee, on IPCC scientific advice and amid many warnings from the UN, says there should be no expansion in UK aviation.	the future. This would limit its ability to support wider economic growth across the sub-region. The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport. As such, it has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the **GCG Explanatory Note [APP-217]** submitted as part of the application for development consent. Regarding environmental impacts associated with the Proposed Development, the ES submitted with the application for development consent, provides assessments of a wide range of environmental effects, including benefits and disbenefits. It will be for the Planning Inspectorate to consider the balance

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			between the costs and benefits of the Proposed Development in providing its recommendation to the Secretary of State, based on the evidence submitted with the application.
Luton Friends of the Earth RR-0879	Surface Access	We have no intention of "suggesting ways to shape the scheme, or to reduce impacts of extra traffic". There must be no scheme, and there must be no extra air or road traffic.	Noted.
Luton Friends of the Earth RR-0879	Cost	We attended the East Midlands & Milton Keynes Sub-Regional Strategy Inquiry in 2004. The Panel of inspectors strongly advised Luton Council "not to put all its eggs in the airport basket". This advice was not heeded. In 2022 government loaned Luton Council £80m due to Covid income losses, on condition that it reduce reliance on the airport. This was more than advice – but again, not only was it ignored, but the council and its company Luton Rising have in 2023 applied to radically expand airport passenger numbers.	The Applicant is not responsible for Luton Council's wider economic or commercial strategies. Therefore, it does not consider I it is appropriate to comment in detail on this point. The Applicant would only note that; its shareholder Luton Borough Council has a diverse and multi-faceted investment portfolio; and that in its role as a vital economic driver the airport contributes around ten per cent of Luton's economic activity, although not more than that; that Luton Rising's borrowing to secure the airport asset against the most serious impacts of the Covid pandemic were not unusual on either a national or sector level, and were aimed specifically at supporting the most timely and effective recovery to protect

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			the local and regional economy, employment and unique social impact investment.
Luton Friends of the Earth RR-0879	Health and Community	Luton FoE objected in 2014 when Luton Council voted to double passenger numbers from 9 to 18 million. A quarter of Luton's GPs signed our petition against this, concerned that it would affect patients' health, but the council voted for the increase.	Noted.
Luton Friends of the Earth RR-0879	Planning	By 2019 the 18m had been achieved, in 5 years instead of 15, with no mitigation, against promises, the Local Plan and the National Planning Framework, making Luton the most polluted town and fastest growing source of climate emissions in UK. That is totally unsustainable and unacceptable, and cannot be repeated.	The application for development consent is supported by a **Green Controlled Growth Framework [APP-218]** which will place controls on four key categories of environmental effect: air quality, greenhouse gas emissions, aircraft noise, and surface access. These topics have been selected as the areas where environmental effects will continue to change over time, as passenger numbers grow and technology improves. The key elements of the legally binding GCG Framework are therefore: a. limits on environmental effects in four key areas; b. a series of processes to be followed as environmental effects reach Thresholds

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			defined below these Limits; c. ongoing monitoring of the actual environmental effects of expansion and operations at the airport; d. independent oversight of environmental effects associated with the operation of the airport; and e. an explicit commitment to link environmental performance to growth at the airport.
Luton Friends of the Earth RR-0879	Climate change	The obvious conclusion is that demand must be managed to reduce, not expand, the number of flights from Luton. Covid was supposed to be a once-in-a-lifetime wake-up call to change our dangerous habits. But worryingly, flight numbers are climbing rapidly toward pre-Covid levels, and climate effects are accelerating.	The UK government has set a legally binding target, under section 1 of the Climate Change Act 2008, to achieve net-zero greenhouse gas emissions by the year 2050 and to meet their 5-yearly carbon budgets. The Government has been clear that climate change targets can be met without seeking to restrict demand. This was made clear in the Government's Response to the Committee on Climate Change's 2022 Annual Report published in March 2023 where it was stated that *"We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth*." (Ref 2).

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Luton Friends of the Earth RR-0879	Wigmore Valley Park	We founded residents' group Friends of Wigmore Park in 2017 when a threat from Luton Council was announced, and Stop Luton Airport Expansion In 2018 when the council admitted that the main threat to the park was not a business park or a dual carriageway through it, but major airport expansion, a second terminal and extensive car parks.	The Green Horizons Park (GHP) (formerly known as New Century Park (NCP)) Application gained planning permission in 2021. In 2018, the Applicant launched a consultation on its new proposals, this is a separate application for development consent seeking to increase the capacity at the airport, it replaces and amends parts of the GHP application while other aspects will still be delivered through that existing GHP permission, as described in ES **Chapter 2 [APP-030]**.
Luton Friends of the Earth RR-0879	19 mppa application	Luton Council had been planning this secretly since 2015. We were one of many groups and individuals objecting to the council's approval of the operator's application to expand from 18 to 19m, the subject of an Inquiry conducted by 3 inspectors in autumn 2022, which has yet to report. It is not clear, or fair on objectors, why the identical principles of expansion, while on a different scale, are overlapping. They are both overseen by the Planning Inspectorate. Many think the Inspectors should have rejected expansion above 18 or 19 million. It would have been helpful to view and digest the conclusions of the previous inquiry. Based on national policy	The 19 mppa planning application is being progressed by LLAOL and is separate to the application for development consent. The 19 mppa application is subject to a separate Public Inquiry, the outcome of which was unknown at the time the application for development consent was submitted.

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		and the number of objections, this should have given grounds for refusal of further expansion, pre-empting the need for a DCO process.	
Luton Friends of the Earth RR-0879	General	We now find ourselves registering to fight the council's Development Consent Order to government to expand from pre-Covid 18 million to 32 million passengers. At this first stage, we are asked for a summary of the main issues. We have not yet read, and may not had time to read, the many jargon-filled documents, which are likely to deter people from commenting. It was not even easy to find the registration form. We are mainly concerned not with details of the plans, but fundamentally oppose the key principle and impacts of expansion.	The Proposed Development is being brought forward in the context of Government policy which supports airports making best use of their runways because of the economic benefits of air transport, as set out in the **Need Case [AS-125]**. The airport is central to the local economy and is an important connectivity asset for the broader region it serves, including the Oxford-Cambridge Arc. It also supports regeneration and levelling up in Luton and neighbouring areas, where levels of deprivation are above average. To maintain its connectivity and significance across the economic region, the airport must address its capacity constraints. Without additional capacity the airport will not be able to accommodate any further growth in demand in the future. This would limit its ability to support wider economic growth across the sub-region. The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the

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			communities around the airport. As such, it has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the **GCG Explanatory Note [APP-217]** submitted as part of the application for development consent. Regarding environmental impacts associated with the Proposed Development, the ES submitted with the application for development consent, provides assessments of a wide range environmental effects, including benefits and disbenefits. The **Non-Technical Summary of the ES [APP-165]** provides a summary of the ES in non-technical language. It will be for the Planning Inspectorate to consider the balance between the costs and benefits of the Proposed Development in providing its recommendation to the Secretary

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			of State, based on the evidence submitted with the application.
Luton Friends of the Earth RR-0879	Climate Change	The national (and international) need is not for airport expansion, but for considerably less flying. The UN and many IPCC scientists have warned repeatedly, since a key report in 2018, that the Climate Emergency is the biggest threat to humanity, and we must do all we can to change behaviours radically in as short a time as possible. 7 years has been cited as all the time we have to act comprehensively to prevent irreversible climate damage. Aviation is the fastest growing source of climate emissions. Not to fly is the biggest single thing individuals and business employees can do to cut their carbon footprint.	The UK government has set a legally binding target, under section 1 of the Climate Change Act 2008, to achieve net-zero greenhouse gas emissions by the year 2050 and to meet their 5-yearly carbon budgets. The Government has been clear that climate change targets can be met without seeking to restrict demand. This was made clear in the Government's Response to the Committee on Climate Change's 2022 Annual Report published in March 2023 where it was stated that *"We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth."* (Ref 2).
Luton Friends of the Earth RR-0879	Climate Change	Grounds for objection 1 Climate Emergency	Noted. The UK government has set a legally binding target, under section 1 of the Climate Change Act 2008, to achieve net-zero greenhouse gas emissions by the year 2050 and to meet their 5-yearly carbon budgets. The Government has been clear that climate change targets can be met without seeking to

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			restrict demand. This was made clear in the Government's Response to the Committee on Climate Change's 2022 Annual Report published in March 2023 where it was stated that *"We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth."* (Ref 2)
Luton Friends of the Earth RR-0879	Ecology	2 Fatal Destruction of Nature, especially one of Luton's best wildlife habitats	Habitat creation is provided as part of the Proposed Development following a robust assessment of existing habitats and design of suitable mitigation through the provision of open space, habitats, and landscape restoration areas, which are larger than the size of the Wigmore Park County Wildlife Site lost. Further areas of Habitat Creation are also provided as additional mitigation. The **OLBMP (Appendix 8.2 of the ES [AS-029])** will ensure appropriate management of the habitats for 50 years with monitoring included to identify the need for adjustments to

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			the management as required.
Luton Friends of the Earth RR-0879	Wigmore Valley Park	3 Wigmore Valley Park – a major amenity for recreation	The design of the Proposed Development evolved to reduce the area of Wigmore Valley Park lost and provide replacement open space of 10% greater area and at least equal quality and accessibility. The northern part of the park, access and car park remain unchanged, improvements to this area in the northern part proposed as part of GHP will be implemented as described in that permission. The southern part of the park lost to this development would be re-provided to the east, in continuity with the remaining park, before work commences in the existing park. Further information is provided in the open space assessment provided as **Appendix C [APP-197]** to the **Planning Statement [AS-122]**.
Luton Friends of the Earth RR-0879	Air Quality	4 Pollution: More planes means millions more road vehicles	The air quality assessment (**Chapter 7 [APP-034]**) has provided an assessment of air quality in Luton following the methodology agreed with the local councils. No significant impacts are predicted to occur. The GCG Framework [APP-218] sets out the proposed approach to ensuring that air quality impacts do not increase in practice above the levels forecasts in the ES, on the basis of

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			ongoing monitoring at a range of locations defined with the **GCG Framework Appendix D – Air Quality Monitoring Plan [APP-222].** The application includes a commitment to increase the proportion of passengers by sustainable modes which should reduce the number of vehicles. Whilst there is a focus on growing the sustainable transport mode share, the growth of the Airport will lead to an overall increase in vehicle numbers. The application includes measures seek to mitigate congestion related effects associated with the increase in traffic.
Luton Friends of the Earth RR-0879	Need Case	5 Luton is the wrong place for a major airport	London Luton Airport is well placed to serve demand for air travel in its catchment area, located principally in the local area and drawing on the Thameslink corridor as set out in Section 5 of the **Need Case [AS-125].**
Luton Friends of the Earth RR-0879	Planning	6 New roads against local plan (2017)	Luton Local Plan Policy LLP31 - Sustainable Transport Strategy Part D states "*support for the continued economic success of London Luton Airport as a transport hub (policy LLP6) will be delivered through: measures to ensure there is capacity at strategically important junctions...*"

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			The **Transport Assessment [APP-203]** sets out the impacts of the highways and access related work as part of Proposed Development.
Luton Friends of the Earth RR-0879	Surface Access	7 Car spaces and travel would increase by over 50%	The proposed car parking numbers to support the Proposed Development have been calculated on the basis of the proposed mode share commitments which seek to reduce the reliance of private vehicle travel. Whilst there is a commitment to increase the proportion of trips by sustainable modes, the growth of the airport will still require additional car parking as reported in the **Transport Assessment [APP-203 to APP-206]**.
Luton Friends of the Earth RR-0879	Noise and Vibration Air Quality Health	8 Noise and dust would increase, cause stress and could have severe health effects	A full Environmental Impact Assessment has been undertaken and the findings are reported in the Environmental Statement submitted as part of the application for development consent; including **Chapter 7 Air Quality [AS-076]**, **Chapter 14 Landscape and Visual impacts [AS-079]** (which includes consideration of tranquillity), **Chapter 16 Noise and Vibration [AS-080]**, **Chapter 18 Traffic and Transport [AS-030]**, and **Chapter 13 Health and Community [AS-078]**. The impact of noise from the Proposed Development has been assessed and all

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			reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the Environmental Statement [AS-080]**. The air quality assessment (**Chapter 7 [AS-076]**) has provided an assessment of air quality in Luton following the methodology agreed with the local councils. No significant impacts are predicted to occur. ES **Chapter 13 Health and Community [AS-078]** reports the findings of the heath assessment which includes effects from noise and air quality.
Luton Friends of the Earth RR-0879	Economics and Employment Surface Access	9 Effect on Local Economy of airport-induced congestion	National, regional and sub-regional economic strategy is strongly focussed on building economic growth around linkages with the global economy. Build Back Better provides explicit direction for the future and identifies as a core pillar the Global Britain policy agenda, which requires enhanced international connectivity. This is reinforced by the Oxford-Cambridge Arc (the Arc) initiative, which is seeking to build on the world class academic and economic assets that are housed within it.

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			As the only major airport within the Arc, a growing London Luton Airport will be central to achieving these aspirations through its ability to facilitate trade, investment and tourism. The airport's role is also vital in the context of the 'levelling up' agenda. Stakeholders in the airport's surrounding areas have identified that, despite apparent high levels of prosperity, there remain substantial and persistent pockets of deprivation. Luton itself is identified as a highest priority area for the Levelling Up Fund and has recently been awarded £20m from the fund. The role of the airport in supporting regeneration in many of these areas is already recognised and future growth in line with Proposed Development will substantially increase this role. These wider economic impacts strongly support the aspirations of stakeholders across the airport's catchment area to drive the international economy to increase productivity, grow prosperity and, ultimately, improve quality of life for the population in Luton, the Three Counties, Six Counties and across the Arc.

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			The Transport-Related Monitoring and Mitigation Approach (TRIMMA), developed from the Outline TRIMMA (Appendix I to the Transport Assessment) (APP-202) will include detail on the required monitoring and reporting related to traffic flows and congestion, to inform the need to deliver the highway mitigation measures identified by the Transport Assessment. Traffic will be monitored at key locations, identified with key stakeholders, and mitigation measures put in place if the agreed limits are reached.
Luton Friends of the Earth RR-0879	Land contamination	10 Luton's largest Landfill Site to be dug up 'at high risk' – consultants	The historic landfill beneath Wigmore Valley Park is acknowledged, has been extensively characterised and assessed in the application documents, particularly ES **Chapter 17 [APP-043]** and associated appendices. Work on the landfill will be regulated under an Environmental Permit and undertaken as described in the **Outline Remediation Strategy [APP-125]**. The DCO requires that the full Remediation Strategy be developed and approved before works commence including measures to protect the environment. The proposed excavation, treatment, and reuse of suitable materials provides environment benefits such as reduced virgin material import, and reducing

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			the risk of groundwater contamination from waste deposited when standards were not as stringent as today.
Luton Friends of the Earth RR-0879	Surface Access	11 DART link from Luton Parkway station will not reduce road traffic	DART is considered a key aspect in meeting the desired mode shift from road to more sustainable modes of transport. It will provide a significant improvement to connectivity for those passengers accessing the airport via rail. DART usage will be monitored as part of the Travel Plan monitoring set out in the **Framework Travel Plan [AS-131]**, with each 5-yearly Travel Plan analysing the previous 5 years CAA mode share data.
Luton Friends of the Earth RR-0879	Mitigation and Management	12 Luton Rising website claims about mitigation are unproven greenwash	The GCG Framework means that growth at the airport will only be delivered where limits on aircraft noise, air quality, GHG emissions and surface access are respected. The Applicant is determined that the airport should play its role in decarbonising UK transport and the economy generally, and as such it is proposing that both emissions associated with airport operations and surface access will be controlled through GCG. The Applicant remains committed to supporting the industry to decarbonise. The

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			Sustainability Statement [APP-216] submitted as part of the application for development consent, sets out the steps taken both to embed measures to reduce GHG emissions, as well as to future-proof proposals to help support the future implementation of new technology.
Luton Friends of the Earth RR-0879	Need Case	13 Airport income not mainly for benefit of residents	Luton Rising is wholly owned by Luton Borough Council (LBC), it provides significant annual funds to LBC to help support front line services and additionally provides significant funds directly to charitable and voluntary organisations supporting local people. It does so at a contribution per passenger rate far greater than any other UK airport. The Community First proposals within the application for development consent seeks to further enhance the level of contributions to local charitable and voluntary organisations as well as to town and parish councils over a wider area than Luton Rising's current provision. In 2019, the last full year before the pandemic, a dividend of £19.5m was paid to LBC along with £9.2m to LBC into the Community Investment Programme to support frontline services.

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			The payment of dividend to LBC has been suspended in the short-term owing to the impact of Covid. It is expected this will be resumed in the medium term subject to a sustainable return to growth and future investment decisions considered by the LLAL Board. Donations into the Community Investment Programme have been prioritised for protection at £7.4m (full year 2022) and £8.3m (full year 2021) as prioritised in the Luton Rising's stabilisation plan, despite dramatically reduced incomes and operational challenges.
Luton Friends of the Earth RR-0879	Economic case and job creation	14 Jobs claims unlikely, poorly paid, and green jobs needed	The basis of the future employment estimates is set out in detail in **Appendix 11.1 to the Environmental Statement [APP-079]**. The employment estimates are considered robust. The **Employment and Training Strategy (ETS) [APP-215]** found that many jobs that are directly supported by the airport are well-paid. The average wage of workers in jobs directly supported by the airport was estimated at £41,100, which is 34% above the national average of £30,700, and 27% above the average for the Borough of Luton. The airport

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			supports jobs at various wage, skill and qualification levels. The airport operator has already implemented the Real Living Wage and they will support and encourage other businesses across the airport to adopt it. Green jobs will be supported, as set out in the **ETS [APP-215].** During construction, a Skills Foresight Leader (SFL) will be appointed as part of the Programme. This role will be held by the airport operator's existing Capex Director. They will set out requirements for construction skills to meet the sustainability objectives and construction innovation requirements set out through this DCO. During operation, as new technological solutions and ways of working emerge for more innovative and sustainable operations of the airport, the airport operator's Human Resources team will provide input into project-specific initiatives.
Luton Friends of the Earth RR-0879	Planning	15 Nationally Significant Infrastructure Project (NISP) - – in excess of thresholds	It is assumed that the query relates to thresholds under the Planning Act 2008. The Proposed Development does exceed necessary thresholds for airport development and is therefore categorised as an NSIP. As a result, the means of obtaining permission to construct and maintain the Proposed

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			Development is through a Development Consent Order under the Planning Act 2008.
Luton Friends of the Earth RR-0879	Planning	16 Conflict of interests and Lack of democracy	The ownership and operation of the airport is different to many other airports. Luton Rising (a trading name of London Luton Airport Limited), owns the airport and are the Applicant for the application for development consent for the Proposed Development under the Planning Act 2008. Luton Rising is wholly owned by LBC (100% shareholder), which means that the airport is effectively in public ownership. In 1998, the Applicant and LBC entered into a Concession Agreement with LLAOL for the management, operation, and development of the airport. This agreement, which lasts until 2032, means LLAOL has complete responsibility for, and control over, the day-to-day running of the existing airport. LBC and LLAOL are both key stakeholders to the Proposed Development and have been consulted extensively as part of the application process. LBC is neither the applicant nor the Planning Authority for the application so there is no prospect of any conflict of interest for LBC. LBC is instead a statutory consultee in the same way as other host local authorities.

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			LBC will consider the proposals and prepare a Local Impact Report in the same way that the other host authorities will. This will be considered by the Planning Inspectorate in its assessment of the proposals before making a recommendation to the Secretary of State for Transport who will make the final decision. For Deadline 1, the Applicant has provided a document setting out how the roles and responsibilities of LBC as a Host Local Authority and owners of the Airport are demarcated **[TR020001/APP/8.29]**.
Luton Friends of the Earth RR-0879	Need Case	17 Covid lessons not learned"	The meaning of this comment is not clear. There is strong evidence that air passenger demand levels have now recovered from the effects of the pandemic with the main UK airports reporting now traffic levels close to pre-pandemic levels. Further detail can be found in the **Need Case [AS-125]**.
National Trust RR-1078	Noise and Vibration	The National Trust therefore objects to the proposed DCO due to: • The impact of the noise pollution caused by the DCO proposals on the tranquillity of the many National Trust sites within the vicinity of the proposed airport expansion;	A full Environmental Impact Assessment has been undertaken and the findings are reported in the Environmental Statement submitted as part of the application for development consent; including **Chapter 14 on Landscape and Visual impacts [AS-079]** (which includes consideration of tranquillity), **Chapter 16 on Noise and Vibration [AS-080]** (which also

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			includes consideration of tranquillity), and **Chapter 10 on Cultural Heritage [AS-077]**. Each chapter described the study area, receptor, assessment, methodology and results. No significant effects have been identified on any National Trust sites.
National Trust RR-1078	Air Quality	The impact of the air pollution caused by the DCO proposals on the ecological condition of the ecologically important and designated sites owned and managed by the National Trust located within the vicinity of the proposed airport expansion.	The air quality impact assessment of impacts on ancient woodland and designated sites has been undertaken in accordance with published guidance including that from Natural England and the Design Manual for Roads and Bridges volume LA105. The assessment began with consideration of numerical exceedance thresholds such as whether the '1% of the critical load/level' initial screening threshold is exceeded and whether the DMRB 0.4 kgN/ha/yr threshold for effects on botanical species richness is exceeded. The assessment then also took account of the extent of the site that would be subject to nitrogen deposition due to the scheme, current nitrogen deposition exposure, and the limited role that further nitrogen deposition has when existing nitrogen deposition is already high, as reported in published research. Where

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			appropriate, consideration was also given to the removal of land from agricultural production to create the Habitat Creation Area, given the large role in atmospheric nitrogen deposition played by livestock. Natural England has concurred with the Habitats Regulations Assessment which concludes no significant air quality effect on Chilterns Beechwoods SAC which is located within the National Trust Ashridge Estate. Please refer to **Chapter 7 Air Quality [AS-076]** for further details.
National Trust RR-1078	Noise and Vibration	Through excluding the National Trust's sites in the assessment of the noise impact of the proposed development, we raise concerns that the existing noise impact will be exacerbated as a result of an increased number of planes using the flight path which passes over these sites at 7,000ft and below.	National Trust sites have not been excluded from the assessment if they are within the study area for each assessment as agreed through EIA scoping and engagement with technical specialists from relevant statutory consultees. Study areas are defined as areas within which potently significant effects may result and therefore need to be assessed; if sites are outside of the study areas no likely significant effects are identified.
National Trust RR-1078	Noise and Vibration	Noise monitoring has not been undertaken at the National Trust's sites however there is often audible air noise from planes within the National Trust sites and it is noted that	A full Environmental Impact Assessment has been undertaken to assess potentially significant effects on the environment. The impact of noise due to aircraft movements

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		the Examining Authority (Planning Inspectorate) undertook a number of unaccompanied site visits in late May to include visits to Ashridge Estate and Ivinghoe Beacon where air noise was noted. It is therefore considered that there is a need for noise monitoring at this location, and other National Trust sites which lie within the vicinity of the existing airport and on the flight path, to establish the impact of the expansion and identify any necessary mitigation required.	from the Proposed Development (which includes consideration of tranquillity) has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. No likely significant effects are identified for National Trust sites. Further details can be found in **Chapter 16 Noise and Vibration of the Environmental Statement [AS-080]**. **ES Chapter 14 Landscape and Visual [AS-079]** also considers tranquillity in that assessment of landscape effects and reports the conclusion of the assessment including effects on the Chilterns AONB from increased aircraft movements resulting from the Proposed Development. Whilst noise monitoring at national trust sites would not affect the assessment, the airport operator consider all requests for the positioning of portable noise monitors and requests can be made directly to the airport operator.
National Trust RR-1078	Noise and Vibration	With regards to the perceived impact of the development, there is already an existing impact from air noise and Luton Airport on the tranquillity of National Trust sites, which are important sites for recreation. There is therefore an expectation that the proposed development would increase that impact on tranquillity. The National Trust object to the	The impact of noise due to aircraft movements from the Proposed Development (which includes consideration of tranquillity) has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. No likely significant effects are identified for National Trust sites. Further details can be found in **Chapter 16 Noise and**

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		impact that the proposals would have upon tranquillity. Whilst reference is made to aeronautical technology advances, these are theoretical and an assessment of the proposals in respect of existing noise levels should be undertaken. Where an adverse impact is identified on National Trust sites, consideration should be made in respect of whether the proposals are appropriate and whether there is the need for mitigation.	**Vibration of the Environmental Statement [AS-080]**. **ES Chapter 14 Landscape and Visual [AS-079]** considers tranquillity in that assessment of landscape effects and reports the conclusion of the assessment including effects on the Chilterns AONB from increased aircraft movements resulting from the Proposed Development. The assessment considers aircraft movements up to 7,000 feet and does not account for any aeronautical technological advances.
National Trust RR-1078	Air Quality Traffic and Transport Biodiversity	Air Quality: The proposed development seeks to incorporate the use of the Airport Access Road (AAR) to provide routes for road traffic away from sensitive receptors in relation to the operation of the proposed airport expansion. Without assessing the full complement of sites to include the identified National Trust sites in relation to routes to the AAR, it is not clear what the impact of the proposed development would be and by excluding these sites, it may result in traffic being redirected towards routes in closer proximity to ecologically important designated sites which are sensitive to vehicle emissions, and this	The air quality assessment (**Chapter 7 [AS-076]**) has provided an assessment of air quality including any amendments to road layouts following the methodology agreed with the local councils. No significant impacts are predicted to occur. The air quality assessment has taken into account the impact of the development based on the strategic traffic modelling information from the CBLTM-LTN model and therefore the impacts of the development are included in the submitted assessment.

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		could have an adverse impact on these designations. Accordingly, we are of the view that this needs to be considered in respect of the impact that the development could have upon National Trust sites.	
National Trust RR-1078	Fleetmix	Whilst there have been assumptions made that aircrafts will become more efficient and result in low emission or zero emission planes, we consider that should the use of low emission or zero emission aircraft be delayed or be considered unviable, an assessment of the current level of emissions should be undertaken to take account of impact on ecologically sensitive sites, to include identified National Trust sites.	The assessments have been made based on the Government's assumptions as to the transition to low or zero emission aircraft as set out in the *Jet Zero Strategy*, as explained at paragraphs 6.6.49-6.6.52 of the **Need Case [AS-125]**. This has been adopted at the principal case for assessment in relation the Greenhouse Gases as explained in **Chapter 12 of the Environmental Statement [APP-038]**.
National Trust RR-1078	Biodiversity Air Quality	Whilst impact on ecological designations and biodiversity has been considered within the DCO, this does not include indirect impact by virtue of an increased use of the flight path across National Trust sites (specifically Ashridge Estates where planes frequently fly at an altitude of 7,000ft or below) and / or the use of the flight path by larger planes carrying greater numbers of passengers. The lack of assessment in this context is concerning with regards to any adverse impact that could be experienced	All National Trust sites lie greater than 5km from the Proposed Development, with most being greater than 10km. All lie greater than 200m from the Affected Road Network (ARN). The Zone of Influence (ZOI) for non-statutory sites and ancient woodland for air quality affects is 2km, and for statutory designated sites is 5km, as defined in **Chapter 8** of the Environmental Statement **[AS-027].** In accordance with International Civil Aviation Organization (ICAO) and Department for

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		on these ecologically important designations.	Transport guidance, emissions above 305m (1,000ft) will not give rise to a significant impact on local air quality and this has been demonstrated from the project modelling. The aircraft flying over Ashridge Estates will be above 305m (1,000ft). The Ashridge Estate falls beyond the ZOI for air quality related impacts for habitats present and designated status. The Ashridge Estate falls partly with Chilterns Beechwoods Special Area of Conservation (SAC), which as a Statutory Designated sites has a wider ZOI than non statutory designated sites or sensitive habitats such as ancient woodland, yet also does not fall within the relevant distance for a potential pathway for an effect in terms of Air Quality. As Chilterns Beechwoods SAC was raised in earlier Scoping and PEIR responses, it was included within the **Habitat Regulations Assessment (HRA) Appendix 8.3 [APP-171]** for consideration of potential air quality effects for completeness, despite being beyond the standard distance. Section 4.2 of the HRA details why there would be no likely significant effect on Chilterns Beachwood SAC, and the HRA has been accepted by Natural England, including the conclusion of

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			no significant impacts to the Chilterns Beechwood SAC, where the Ashridge Estate lies.

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New Economics Foundation RR-1087	Need Case	NEF does not support the expansion of Luton Airport. The economic benefits are overstated by the applicant, and the economic and environmental downsides are ignored and/or understated. When the relevant scheme costs, benefits, their balance of equity, and the long-term societal risks are taken into account, the scheme's overall balance is negative and entails unreasonable levels of risk to local, national and international wellbeing.	The Proposed Development has been subject to a full and extensive environmental impact assessment that considers the full range of potential impacts on society, the economy and the environment, both positive and negative. This is the appropriate 'test' in relation to a planning application and is essential to considering the planning balance, which is discussed in section 9 of the **Planning Statement [AS-122]**. The benefits and adverse impacts associated with the Proposed Development, including any environmental and social benefits/impacts, will be taken into account by the Examining Authority in making a recommendation to the Secretary of State who will make a decision in relation to the application for development consent.
New Economics Foundation RR-1087	Need Case	The benefit of the scheme to business travel and hence business productivity is grossly overstated. Nationally, business air passenger numbers peaked in 2006 and they are highly unlikely to return to that level for decades, if ever. The proportion of	The business productivity benefits have been assessed using a well-established methodology. This methodology was used at the recent Bristol Airport planning inquiry and was accepted and found to be robust and reasonable.

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		passengers travelling for business at Luton Airport fell from 22.0% in 2006 to 12.8% in 2019. National-level data suggests this will have fallen further since the pandemic. New airport capacity is not required to serve current, or future, levels of business travel demand. Any new business passengers at Luton Airport that arise from this scheme will likely be displaced from other airports and not newly created.	No evidence is presented to substantiate the statement about business travel taking decades to recover to 2006 levels. Figure 5.12 of the **Need Case [AS-125]** evidences growth in business passengers using London Luton Airport since 2016. It is not clear the source of NEF's data as it does not accord with the data contained in the Civil Aviation Authority's Annual Departing Passenger Survey Reports, which are based on larger sample sizes and considered more robust than the International Passenger Survey, which is the only other source of data of this type. The pattern of business travel at London Luton Airport tells little about the level of business travel in the airport's catchment area given its position in the overall London system and tells little about the likely level of business travel in the future at an expanded London Luton Airport, with a broader range of services and greater service frequency, operating in a more constrained overall London system. Aviation market intelligence suggests that the number of business passengers is rising again

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			as global travel has opened up post-pandemic. As can be seen in Table 6.1 of the **Need Case [AS-125]**, growth in business passengers is expects to be materially less elastic to underlying GDP growth than leisure travel. Despite that, the proportion of passengers at London Luton Airport travelling for business purposes in 2043 is expected to be similar to 2019 figures (more foreign, less UK) due to changes in the route network offering a greater range of business related air services over time.
New Economics Foundation RR-1087	Need Case	Luton Airport's primary service is the sending of UK residents overseas on leisure trips. The absence of any quantification of the impact of outbound and overseas travel and tourism spending, and the net balance of tourism impacts, is skewing the scheme's presentation. Assessing this net impact was identified in a report commissioned by the DfT in 2018 as one of three "key diagnostic tests" of an air transport intervention's merit. To exclude this function from detailed analysis flies against the fundamental principles of appraisal and skews the assessment of the	It is important to highlight that over half of the UK resident leisure trips from London Luton Airport in 2019 were travelling for the purpose of visiting friends and relatives (**Need Case [AS-125]** Figure 5.9). They were not purely discretionary outbound leisure trips as the respondent seeks to imply. It has been established through the planning process, for instance at the Bristol Airport 12 mppa planning inquiry and the Stansted Airport 35+ planning inquiry, that there is no evidence to suggest that outbound leisure travel from the UK is detrimental to the UK

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		scheme. Given the significant resource that has gone into the application it would have been possible to develop a far more sophisticated understanding of the implications of the Airport's net tourism balance and its wider ramifications.	economy and this is part of the basis for the UK Government's policy position in this regard. It should also be noted that the outbound tourism was scoped out of the environmental impact assessment as described and justified in **Chapter 11 of the of the Environmental Statement** (Section 11.3) **[APP-037]** and agreed with the Panning Inspectorate. Furthermore, this argument ignores the quality of life and economic welfare benefits associated with outbound leisure travel that are an essential part of making the UK and its cities an attractive place to live and work, which will increase GDP and employment. To seek to reduce the argument to a simple 'balance' between the numbers of people travelling in and out of an airport is to misunderstand the status of the UK as an advanced trading economy. Tourism is ultimately just a form of trade. The economic theory around gains from trade, both nationally and globally, are well established and accepted. Trade enables specialisation and the development of comparative advantage, thereby supporting productivity,

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			prosperity and growth amongst all trading parties. It is also worth noting NEF's previous comments in relation to the treatment of outbound tourism in relation to the Bristol Airport original planning application, where again outbound tourism was dealt with qualitatively as in the Need Case Section 8: "*Following this analysis, the Assessment moves on to consider the impact of outbound tourism. Generally, the discussion of this topic is robust and, while it understates any negative effects of outbound tourism, the Response correctly points out that the UK Government has made a judgement that outbound tourism is of sufficiently little negative consequence to not be considered when making plans to boost inbound tourism*." (Ref 15). It is unclear as to why NEF's position has changed.
New Economics Foundation RR-1087	Need Case	The equity dimensions of the scheme have not been presented by the applicant. The scheme will likely exacerbate inequity and run counter to the government's levelling-	There is no suggestion within Government policy around levelling-up that any area should be 'held back' to support growth elsewhere and hence comments about the Proposed

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		up agenda. Expanding the existing airport capacity is only likely to hurt the UK's held-back regional economies that consistently face a travel and tourism spending deficit while London sees a travel spending surplus. Furthermore, the question of ticket price savings (consumer surplus) should be considered not just in aggregate terms, but also with regard to which groups in society benefit versus which groups lose out from the scheme's wider costs (environmental and economic).	Development in this regard are considered to be without foundation. It should also be noted that Luton itself is identified as a highest priority area for the Levelling Up Fund and has recently been awarded £20m from the fund. An **Equality Impact Assessment [APP-227]** was submitted as part of the application**.**
New Economics Foundation RR-1087	Need Case	Job projections are optimistic. There has been no net national growth in air transport sector jobs since 2006. Air transport (and supporting services) jobs in Luton Unitary Authority peaked in 2005, and in the wider Bedfordshire and Hertfordshire area in 2007. Despite a doubling in the number of the passengers seen over the intervening period, jobs in air transport (and supporting services) were around 1,000 below their peak in both geographies in 2019. As evidenced at the 2022 planning inquiry, documentation submitted by Luton Airport associated with a previous expansion application in 2012 dramatically	It is not appropriate to consider only jobs classified within the air transport sector (as defined by the Office of National Statistics) as there are many other occupations, particularly related to retail and catering activity that are an intrinsic part of an airport's direct economic footprint. The relevance of the reference to the employment estimates made in 2012 is unclear. At that inquiry into London Luton Airport Operations Limited's application to increase the passenger cap at the Airport to 19 mppa, NEF made clear that it placed more reliance on the estimates of on-site

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		overestimated the scale of employment creation that would result.	employment presented as part of the DCO application (5 October a.m.) so it is unclear why it is now stated that the employment estimates are optimistic. An explanation for the difference in approach and why comparisons to past employment estimates are not valid is given in Appendix 1 to the Oxford Economics Report on the **Economic Impact of London Luton Airport (2022) [APP-079]**.
New Economics Foundation RR-1087	Need Case	The quality of the jobs created is also questionable. Wages paid to lower and middle earners in air transport have been declining rapidly in real-terms in recent years. Indeed the Air transport sub-sector has seen the fastest decline in real wages of any sector in the UK economy between 2008 and 2022. Luton Airport's own data shows that in 2019, pay levels experienced by residents of Luton and Bedfordshire employed by the airport were similar to the average for the county, providing no meaningful value add to worker wages.	It is clear in the Oxford Economics Report on the **Economic Impact of London Luton Airport (2022) [APP-079]** that average wages of airport direct employees were on average 12.5% higher than for all employees across the Three Counties area. The Applicant considers that this indicates the value of airport jobs in the local area.
New Economics Foundation RR-1087	Noise and Vibration	The detrimental social and economic impact of night flights appear to have been understated. A more holistic analysis is needed to understand how night flights	The impact of noise due to night flights has been assessed and all reasonably practicable measures have been explored to reduce noise

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		could impact on already-highly-deprived areas of Luton and the surrounding areas, including equity assessment and assessment of health impacts.	impacts and have not been understated as is claimed. Further details can be found in **Chapter 16 Noise and Vibration** of the ES **[AS-080]**. This assessment of noise has informed the health impacts reported in **Chapter 13 [AS-078]**. The implications of this analysis are carried forward into the **Equality Impact Assessment [APP-227]**.
New Economics Foundation RR-1087	Need Case	The applicant's cost-benefit analysis is selective and follows no standard methodology. Key scheme costs are missing, including monetised noise and air quality impacts, as well as non-CO2 impacts. The approach taken to consumer and producer surpluses is non-standard and hence may be flawed. Airport profits are included, but airline losses resulting from the reported air-fare savings are not. Scheme benefits are overstated, including the assessment of tax impacts which ignores a variety of potential tax losses that are likely to arise, particularly in lost VAT linked to lost spending in other sectors. The equity of impacts has not been considered when one notes that a wealthy few make	The high level Cost Benefit Analysis included in Section 8 of the **Need Case [AS-125]** follows the same broad methodology as that included in the Bristol Airport Public Inquiry. This methodology was accepted at that inquiry and is one which the Applicant believes that NEF endorsed as the appropriate approach at the Inquiry into London Luton Airport Operations Limited's application to increase the passenger cap at the Airport to 19 mppa (5 October a.m.). In relation to the equity of air travel, as prices rise in the event of airport constraint, it is lower earners that are more likely to be priced out of the market. Hence, ensuring that there is sufficient airport capacity to meet demand at

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		up a majority of the frequent flyers while the resulting climate costs are borne by society at large.	London Luton Airport is more likely to result in lower air fares than if capacity is constrained.
New Economics Foundation RR-1087	Need Case	Valuation of greenhouse gas impacts appears not to have been accurately performed in the scheme's economic assessment. NEF's initial calculations suggest that the applicant has significantly underestimated the scheme's greenhouse gas costs. Non-CO2 impacts have also not been quantified. These issues are skewing the results of the applicant's cost-benefit analysis.	The valuation of carbon uses the most up to date BEIS (now the Department for Energy Security and Net Zero) appraisal values and is based on the carbon assessment as set out in **Chapter 12** of the ES **[APP-038]**. The assessment of the carbon impacts of the development follows best practice. It is not clear the basis upon which NEF has made its initial calculations, which is claimed show that the Applicant has significantly underestimated the greenhouse gas costs.
New Economics Foundation RR-1087	Greenhouse Gases	The risks of the scheme to the environment are significant, and approval would run counter to the precautionary principle. The applicant assumes that it will be possible to utilise speculative, un-proven technologies to reduce future greenhouse gas emissions, and to capture residual emissions from air travel. The risk that such technologies will not materialise at scale, or will not be affordable is great and should count against the scheme. Furthermore, issues such as the competition between	The application is in accordance with the Jet Zero Strategy (Ref 1), which makes clear that Government is taking action to address these matters and that they are not barriers to airport growth. The GHG assessment set out in **Chapter 12** of the ES **[APP-038]** assumes that the UK Government will deliver on the mitigation measures described in the High Ambition scenario of the Jet Zero Strategy (Ref 1). This scenario represents committed targets in

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		sectors for such technologies, and their optimal use are not addressed. Use of nascent carbon capture capacity to re-capture air transport emissions made from further, non-essential air travel, predominantly taken by wealthy frequent flyers, represents an inefficient use of capacity and should count against the scheme.	current government policy, so it is reasonable to embed these assumptions into the assessment. As described in the ES chapter, there are market-based measures including CORSIA and the UK ETS that will act as controls on aviation emissions should these mitigation measures not be delivered as projected by the UK Government. Ultimately, it is the responsibility of the government to implement policies that will achieve the UK's legally-binding net zero target for 2050 and the limits set by the carbon budgets that have been ratified by parliament.
New Economics Foundation RR-1087	Greenhouse Gases	Furthermore, recent research has evidenced the substantial impact that air travel has on the climate via non-CO2 emissions. These impacts are unmitigated and unresolved in government policy and given the risks involved should count heavily against the scheme.	Non-CO_2 emissions are discussed within Section 12.12 of **Chapter 12** of the ES **[APP-038]**. There remains significant scientific uncertainty around the overall warming effect of non-CO_2 impacts. Furthermore, there is no recognised benchmark against which to compare the emissions of non-CO_2 impacts. They are not within the Nationally Determined Contributions declared pursuant to the 2015 Paris Agreement or the carbon budgets set pursuant to the UK Climate Change Act, and are not included in the Aviation emissions trajectory

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			for the Jet Zero Strategy (Ref 1) High Ambition scenario that this assessment uses as a comparator for Aviation emissions. For these reasons, while it is important to acknowledge the presence and warming effect of these non-CO_2 impacts, this assessment has not sought to quantify non-CO_2 impacts, consistent with current Government and Committee on Climate Change advice. Ongoing GHG reporting by the Airport will follow all government policy as it evolves on this issue. This approach is supported by recent case law, particularly R (on the application of Friends of the Earth Ltd and others) v Heathrow Airport Ltd [2020] UKSC 52. In the Jet Zero Strategy (Ref 1) – one year on report of July 2023 (page 33), the Department of Transport has made clear that further work is required to understand the impact of aviation's non-CO_2 emissions on climate change. It indicates that consideration is being given to how such impacts could in future be captured within the UK Emissions Trading Scheme.

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New Economics Foundation RR-1087	Greenhouse Gases	NEF does not accept the applicant's position that greenhouse gas emissions impacts are out of scope of this appraisal and its cost benefit analysis. NEF does not regard this position to be aligned to government policy. The Making Best Use of Existing Runways policy clearly mandates planning authorities to take account of "all relevant considerations, particularly economic and environmental impacts". Furthermore, irrespective of whether cumulative warming is ultimately limited to 1.5oC or 3oC, all additional greenhouse gas emissions worsen climate breakdown and all emissions make it harder for government to achieve its legislated Net Zero target. All emissions should therefore count against any scheme in the balance of its appraisal.	The Climate Change Act 2008 commits the UK government by law to reduce greenhouse gas emissions. The Act was amended through the Climate Change Act (2050 Target Amendment) Order 2019, to commit government to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. The Act also requires government to set legally binding, five year carbon budgets providing a trajectory to net zero. Previous decisions in favour of airport development such as that at Bristol Airport, have been supported by the document 'Making Best Use (MBU) of Existing Runways', where government has made it clear that the matter of aviation emission reduction should sit at a national level rather than with any individual airport. MBU, Paragraph 1.12, under sub heading 'The role of national policy', states "we (government) shall be using the Aviation Strategy to progress our wider policy towards tackling aviation carbon". MBU, paragraph 1.12 states, "We (government) shall be using the Aviation

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			Strategy to progress our wider policy towards tackling aviation carbon. However, to ensure that our policy is compatible with the UK's climate change commitments we have used the DfT aviation model4 to look at the impact of allowing all airports to make best use of their existing runway capacity". MBU, paragraph 1.14 goes on to reference the Aviation Strategy stating, "As explained in Chapter 6 of the Aviation Strategy Next Steps document , we have made significant steps in developing international measures for addressing aviation carbon dioxide (CO_2) emissions, including reaching agreement at the International Civil Aviation Organisation (ICAO) in October 2016 on a global offsetting scheme for international aviation, known as the Carbon Offsetting and Reduction Scheme for International Aviation, or CORSIA". The Bristol Airport decision is clear that carbon emissions from aircraft are a matter for national government and not a relevant issue for a planning application on a specific scheme for airport development. This was confirmed following judicial review and similarly in relation to Southampton Airport. The

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			emissions identified via the carbon assessment are not a net impact on UK carbon emissions and, consequently, it is not appropriate to include them within the assessment. This is not withstanding the point that the great majority of aircraft emissions at London Luton Airport will be covered by the Emissions Trading Scheme or CORSIA and, hence, the costs associated with these are already internalised within the price of travel. Given that the costs of carbon or its abatement based on the BEIS (DESNZ) appraisal values, this has already been accounted for in developing the demand forecasts for the Proposed Development as made clear at paragraph 6.3.9 b) of the Need Case [AS-125].
New Economics Foundation RR-1087	Need Case	Robust appraisal practice has not been adhered to by the applicant. Core sections of the application, such as the Cost-Benefit Analysis presented in the Need Case, diverge from best practice in ways which inflate the attractiveness of the scheme. Running throughout the application is a reluctance to address potential negative impacts of the scheme in a fair and robust manner. The decisions to downplay non-CO2 impacts and the implications of the balance of inbound and outbound tourism,	The Proposed Development has been subject to a detailed environmental impact assessment. To suggest that a robust appraisal practice has not been adhered to by the Applicant which implies that the Applicant has not considered the full range of potential impacts is unfounded and wrong. The Cost Benefit Analysis set out in Section 8 of the **Need Case [AS-125]** is consistent with that presented at the Bristol Airport Inquiry and accepted by the Inspectors.

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		two of the primary impacts of the scheme, do not align with the high level principles of government impact assessment guidance. Guidance (TAG) clearly states that "as many of the impacts of a scheme or option as possible" should be presented in monetary terms in the cost-benefit analysis. Where this is not possible "supplementary techniques should be used to weigh up non-monetised impacts".	NEF also advocated this as the approach that should be followed at the inquiry into London Luton Airport Operations Limited's application to increase the passenger cap at the Airport to 19 mppa (5 October a.m.).
New Economics Foundation RR-1087	Need Case	At critical junctures in the Applicant's documentation there are an array of serious misrepresentations of data. For example, the executive summary of the Need Case (PDF pg.8 points a. to d.), makes a claim regarding "additional GDP" which is created "across the UK" by the scheme. The applicant's own economic assessment in fact shows that the figures cited in the Need Case are gross, and not net, and as such are incorrectly identified as "additional". As presented, the figures are highly misleading.	The figures as presented are not considered misleading and accord with standard practice for airport economic impact assessments. It is made clear at paragraph 8.3.5 of the **Need Case [AS-125]** that the impacts are first of all presented in gross terms. The extent to which there would be displacement is then considered in the following paragraphs in the document.
New Economics Foundation RR-1087	Need Case	Insufficient sensitivity testing has been performed. A wide array of key model parameters, elasticities, and multipliers, have not been tested. The decision to	The Applicant does not agree with the statement that insufficient sensitivity testing has been performed.

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		focus only on faster and slower growth scenarios misses the point of sensitivity testing. The testing of core model input parameters will provide users with far more information regarding the robustness of the Airport's assumptions."	The demand projections were developed using a 'monte carlo' model which considered a large range of potential assumptions and their combinations as set out in Section 6 of the **Need Case [AS-125]**. It was determined that the 20th, 50th and 80th percentiles represented a reasonable range to form the basis of assessment. The implications of these different potential rates of growth have been considered throughout the Environmental Statement to ensure that the sensitivity of the impacts to potential different assumptions as to growth are clearly set out.
England's Economic Heartland RR-0443	Need Case	Luton Airport is the only major airport located within our region's boundaries. It is a significant asset: as a key international gateway, a major regional employer and a key contributor to the economy. As one of the top five busiest airports in the UK, it is a focus for European services and a key hub for private business aviation services.	Noted.
England's Economic Heartland	Need Case	EEH's Transport Strategy, published in 2021, sets out the strategic ambition for the region. This includes a commitment to	Noted.

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RR-0443		support net zero transport by 2050; improve quality of life and wellbeing through a safe and inclusive transport system accessible to all; support the regional economy by connecting people and businesses to markets and opportunities; and ensure the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways, in a way which lessens its environmental impact. The strategy states that, 'as one of the world's leading economic regions our continued success is dependent upon being connected globally'. Emissions from aviation were not considered to be in the scope of the transport strategy and we acknowledge that our local authority partners may wish to make their own representations, for example around the impact of expansion on flight paths.	
England's Economic Heartland RR-0443	Surface Access	The EEH transport strategy actively encourages investment in improved, decarbonised surface access connectivity that addresses and reduces the environmental impact of international gateways. We are pleased that the	Noted.

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		proposal includes a surface access strategy. Delivery of the Direct Air Rapid Transit (DART) has improved connectivity between Luton Airport Parkway Station and the airport. Improving travel opportunities via national rail services stopping at Luton Airport Parkway is key to reducing the need to travel to the airport by private car. EEH believes that the proposal to expand Luton Airport should be viewed through the lens of the strategic ambition for the region, as well as within the context of national targets, including those in relation to decarbonisation of the transport system.	
England's Economic Heartland RR-0443	Surface Access	To support the transport strategy EEH is currently developing connectivity studies that show what the most effective connectivity solutions are for key corridors across the region, including those that cover Luton Airport. The evidence captured will be used to shape investment proposals going forward, through EEH or in support of individual local authorities' priorities. They are guided by the policies set out in the EEH transport strategy and steered by our local authority partners. The package of interventions identified will form a key part of our investment pipeline for the region.	Noted.

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		We believe the outputs from the connectivity studies, will provide useful evidence regarding future opportunities to improve surface access to the airport.	
England's Economic Heartland RR-0443	Need Case	EEH recognises the economic significance of the United Kingdom's aviation network. The ability to connect regions economically has enabled trade links to be established both domestically and internationally. Such linkages support economic activity across the region and beyond, and bring significant benefits to our businesses and residents. The proposed expansion of the airport will create opportunities to generate benefits for the local economy and residents, especially in the use of a local airport, thereby providing relief to other parts of the wider South East airport system. However, the implications of the proposed expansion, including its environmental implications need to be carefully considered and appropriate measures put in place to ensure that the proposal is consistent with the wider strategic ambition for the region.	This response confirms the significant economic contribution of the Airport within the region and the potential opportunities that will be created within the EEH region with the Proposed Development.

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England's Economic Heartland RR-0443	Surface Access Strategy	We are pleased is a strategic surface access plan is included in the proposal. This must ensure the airport is accessible for workers, travellers, services and freight by more sustainable modes, and alternative fuels with a focus on decarbonisation to move away from dependence of combustion-engine vehicles for accessibility.	Noted. The **Surface Access Strategy [APP-228]** covers a 20-year period and therefore it is strategic in nature, helping to shape and guide the long-term growth of the airport. The vision and objectives of the SAS will be realised through the preparation of future Travel Plans (TP), produced every five years, which will set out the specific interventions and Targets for surface access during that shorter time period. The **Framework Travel Plan [AS-131]** sets of a longlist of possible interventions and measures that could be deployed post-consent when the first Future Travel Plan is produced. These cover the six priority areas of (1) Luton DART and Rail, (2) Vehicle Access, Parking, Private hire Vehicles and Taxis, (3) Walking and Cycling, (4) Bus and Coach, (5) Highway Interventions, (6) Technology and Communication.
England's Economic Heartland RR-0443	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: Investment in the delivery of measures that improve local connectivity between the airport and the immediate surrounding area – those measures to be supported by proposals that actively engage airport employees (both existing and future) and	Whilst the public transport mode share for passengers did reduce substantially as a result of the pandemic and the restrictions on social mixing, 2022 Civil Aviation Authority (CAA) data shows that there has been a significant recovery, with 35% of passengers using public transport. This is approaching the level of public transport use recorded in 2019,

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		encourage them to use active travel modes. The targets as a minimum should be to achieve pre-pandemic levels. It is noted that the current access is very vehicle focused with no cycling access and the walking route is up a hill and under the existing runway.	when 38% of passengers used public transport. The opening of the Luton DART provides further opportunities for sustainable access to the airport. Cycling improvements are included in the toolbox of measures set out in the **Framework Travel Plan [AS-131]**.
England's Economic Heartland RR-0443	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: Investment in the delivery of public transport infrastructure including coaches and rail to provide an enhanced travel options for those accessing the airport from all areas of the EEH region. It should be noted that there are several areas close to Luton that have no direct public transport access to Luton airport. Connectivity east and west will be key to providing workers and passengers more sustainable travel options.	Engagement with bus operators to improve the existing routes and create new and extended routes, better connecting the airport to more places (especially east-west) and in particular urban areas and transport hubs is included in the toolbox of measures set out in the **Framework Travel Plan [AS-131]**. The Applicant and Operator are currently developing a suitable and effective funding mechanism that best responds to the vision and objectives of the **Surface Access Strategy [APP-228]** and realising Sustainable Transport Opportunities. Further details will be shared during the course of the examination, following further consultation with relevant stakeholders on the details of the Sustainable Transport Fund.
England's Economic Heartland	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: There should be ambitious targets for	The Applicant has taken a pragmatic view on mode share targets given the airport's location, staff and passenger catchments, and is supportive of sustainable transport, including

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RR-0443		modal split both for workers and passengers that as a minimum are above pre-pandemic levels – with stretch targets to achieve more ambitious future modal split.	tripling the number of coach and bus bays as part of the expansion and extending the Luton DART to Terminal 2. The mode share targets in the **Framework Travel Plan [APP-229]** are considered to be more ambitious than those set out in the **GCG Framework [APP-218]**, which correspond with the 'reasonable worst case' assumptions of the **Transport Assessment [APP-203 to APP-206, AS-123]**. This reflects the additional level of ambition of the Applicant and the operator as the airport grows.
England's Economic Heartland RR-0443	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: Funding should be provided to ensure that transport infrastructure and revenue funding is provided to meet modal shift targets to support alternative modes of travel to all parts of the region - not just the local Luton area.	The Applicant and Operator are currently developing a suitable and effective funding mechanism that best responds to the vision and objectives of the **Surface Access Strategy [APP-228]** and realising Sustainable Transport Opportunities. Further details will be shared during the course of the examination, following further consultation with relevant stakeholders on the details of the Sustainable Transport Fund.
England's Economic Heartland RR-0443	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: Car parking – significant increases in car parking are proposed but increases to on-	The proposed car parking numbers to support the Proposed Development have been calculated taking into account increasing sustainable transport the mode share as set

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		site car parking should only be considered once opportunities to improve local connectivity and public transport infrastructure and services have been fully exploited.	out in the **Section 9** of the **Transport Assessment [APP-201]**.
England's Economic Heartland RR-0443	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: Investment in improved highway infrastructure should prioritise improvements that support local connectivity and public transport infrastructure and services.	The Transport-Related Monitoring and Mitigation Approach (TRIMMA), developed from the Outline TRIMMA (Appendix I to the **Transport Assessment**) **[APP-202]** also includes detail on the required monitoring and reporting related to traffic flows and congestion, focused on the localised impacts and required mitigation identified by the Transport Assessment. The Applicant and Operator are currently developing a suitable and effective funding mechanism that best responds to the vision and objectives of the **Surface Access Strategy [APP-228]** and deliver on selected interventions and measures outlined in the **Framework Travel Plan [AS-131]**. Further details will be shared during the course of the examination, following further consultation with relevant stakeholders on the details of the Sustainable Transport Fund.

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England's Economic Heartland RR-0443	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: Midland Main Line – the applicant should discuss with the East Midlands Railway franchisee the level of service required to enable Luton Airport Parkway station to serve as a gateway to the airport: the significance of rail will increase further as a result of the proposed expansion, and this must be reflected in the level of service provided with seamless connectivity with the DART.	The completion of DART and extension to the new terminal area should make access by rail more attractive and the Applicant and airport operator will work with train operating companies to maximise the opportunities for trains to call at Luton Parkway Station. In the future, the Operator will work closely with rail and bus service operators through the Airport Transport Forum and development of future Travel Plans, which will set out measures improve services in order to meet future mode share Targets. The Governance of this process is set out in Chapter 8 of the **Surface Access Strategy [APP-228]**.
England's Economic Heartland RR-0443	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: There should be safeguarded links with future East West Rail and in particular identify what additional services might be required in order to offer additional travel opportunities through effective interchange between Midland Main Line services and East West Rail.	The East West Rail Western Section has been included in the modelling from 2027 as 'Near Certain'. Please refer to Table 3.3 in Appendix F of the **Transport Assessment [APP-201]**. Improvements to the public transport network require discussion and negotiation with third parties. In the future, the airport operator will work closely with bus and rail service operators through the Airport Transport Forum and development of future Travel Plans, which will set out measures to improve services in order to meet future mode share Targets. The Governance of this process is set out in

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			Chapter 8 of the **Surface Access Strategy [APP-228]**.
England's Economic Heartland RR-0443	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: Bus and Coach Provision – the proposal to establish a new coach station and a new bus station is welcomed. However there is a need for the applicant to work with service providers to identify the level of services required in order that this is realised and should be supported by sufficient funding to increase existing service frequencies and the range of destinations served by buses and coaches, especially east and west connectivity.	The Applicant is supportive of measures to improve active and sustainable travel modes and will work with local authorities and bus and coach service providers to implement any improvements wherever reasonably practicable. Further detail on interventions and funding will be provided in future Travel Plans, as outlined in the **Framework Travel Plan [AS-131]**.
England's Economic Heartland RR-0443	Surface Access Strategy	The surface access strategy should be underpinned by the following principles: The applicant proposes a range of different mitigation approaches to offset the impact of the airport expansion at surface level on the environment. Whilst these are welcome, there is a need for the applicant to quantify how they will ensure the proposal are consistent with the national targets to bring greenhouse gas emissions to net-zero by 2050. This is pertinent, not only for surface access to the airport but	Greenhouse gas emissions have been assessed and reported in **Chapter 12 Greenhouse Gases [APP-038]**. Carbon emissions for surface access, airport ground operations, construction, and aircraft emissions are calculated and reported, with measures to minimise emissions, in line with the Airports National Policy Statement and assessed against the national carbon reduction targets. Aviation emissions in the ES are modelled on the Jet Zero Strategy (Ref 1) High Ambition scenario that represents current

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		also given the need for the aviation sector to make its own contribution towards achieving the net zero carbon target for the UK by 2050. The Applicant should be consider its own and airside operations and how these can contribute to net zero.	UK Government policy on aviation including the sector budgets and targets.
England's Economic Heartland RR-0443	Need Case	Given the strategic significance of the airport as an international gateway and focus for economic opportunities with the wider EEH region, we therefore, are registering as an interested party to ensure that the expansion of Luton Airport provides positive wider benefits to the region and that the surface access strategy ensures connectivity with the rest of the region.	Noted.
North Herts & Stevenage Friends of the Earth RR-1120	Greenhouse Gases	We oppose the proposed development because we believe the expansion of passenger capacity at Luton Airport will have very significant adverse environmental impacts, locally and nationally (due to the consequent increase in greenhouse gas emissions from aircraft using the airport).	A lifecycle GHG impact assessment has been undertaken in line with the principles for environmental impact assessment and compliance in the Airports National Policy Statement, as presented in **Chapter 12 Greenhouse Gases** of the ES **[APP-038]**. Government policy as set out in the Jet Zero Strategy (Ref 1) is that there is no need to restrict growth in air transport demand to enable the Government's climate change targets to be met, albeit there will be higher

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			costs associated with decarbonisation. These costs are taken into account in the demand forecasts for the Proposed Development as set out in the **Need Case [AS-125]**. Carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy (Ref 1) High Ambition scenario that represents current UK Government policy on aviation. Ultimately the greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK Emissions Trading Scheme (UK ETS) within the European Economic Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050. The benefits and adverse impacts associated with the Proposed Development, including any environmental and social benefits/impacts, will be taken into account by the Examining Authority in making a recommendation to the Secretary of State who will make a decision in

Interested Party and Examination Library Reference	Topic	Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response
			relation to the application for development consent.
North Herts & Stevenage Friends of the Earth RR-1120	Greenhouse Gases	Aspects of the DCO proposal on which we may wish to submit comments include the following: - the level of additional greenhouse gas emissions arising from the projected increase in flights, and whether this increase is compatible with meeting the UK's 2050 "net zero" target (and taking account of growth plans put forward by multiple regional and national airports);	The UK government has set a legally binding target, under section 1 of the Climate Change Act 2008, to achieve net-zero greenhouse gas emissions by the year 2050 and to meet their 5-yearly carbon budgets. Carbon emissions for aviation in the **Chapter 12 Greenhouse Gases** of the ES **[APP-038]** are modelled on the Jet Zero Strategy (Ref 1) High Ambition scenario that represents current UK Government policy on aviation. The modelling behind the Jet Zero Strategy (Ref 1) (and the update) incorporated growth at other airports and at Luton at the same level as that proposed by the application. The Government has introduced the UK Emissions Trading Scheme (UK ETS) and the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) as tools to control carbon emissions. Ultimately the greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK ETS within the European Economic Area, and the global CORSIA.

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			The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050.
North Herts & Stevenage Friends of the Earth RR-1120	Greenhouse Gases	Aspects of the DCO proposal on which we may wish to submit comments include the following:… - questionable assumptions made by the applicant about near-term developments in aircraft technology (e.g. "zero emission aircraft");	Assumptions regarding the timing and extent to which zero emission aircraft might enter the airline fleets are consistent with the assumptions made by the Government in the Jet Zero Strategy (Ref 1).
North Herts & Stevenage Friends of the Earth RR-1120	Greenhouse Gases	Aspects of the DCO proposal on which we may wish to submit comments include the following: … - factors which may mitigate anticipated increases in demand for flying over the next 20 years (e.g. impacts of climate change, changing public awareness of environmental risk, shifts in government policy);	There is currently no indication that climate concerns are materially slowing the demand for air travel. Nonetheless, the demand forecasts as set out in the **Need Case [AS-125]** do consider that costs associated with carbon, such as carbon permits or carbon abatement measures, will increase over time, impacting the cost of air travel and, hence, the level of demand. The demand forecasts allow for the full costs of carbon and/or its abatement to be passed through to passengers in terms of the air fares. Hence, the forecasts of demand are already lower than would be the case if the costs associated

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			with decarbonisation were not already factored in.
North Herts & Stevenage Friends of the Earth RR-1120	Noise and Vibration	Aspects of the DCO proposal on which we may wish to submit comments include the following: … - the adverse impact of aircraft noise on local communities, and the adequacy of proposed mitigation measures;	The impact of noise due to increased aircraft movements from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration** of the ES **[AS-080]**.
North Herts & Stevenage Friends of the Earth RR-1120	Air Quality	Aspects of the DCO proposal on which we may wish to submit comments include the following: … - increased congestion and emissions arising from additional road traffic generated by projected growth in passenger numbers.	The air quality assessment in **Chapter 7** of the ES **[APP-034]** has provided an assessment of air quality taking into account highway works included in the Proposed Development following the methodology agreed with the local councils. No significant impacts are predicted to occur in any location within the air quality study area. Stevenage lies outside the air quality study area. Any effects outside the study area are not predicted to be significant.
PAIN (People Against Intrusive Noise) RR-1133	General Environment	PAIN opposes the Luton Rising DCO application on grounds that substantial expansion of Luton airport would create substantial overall harms which outweigh its claimed benefits. PAIN's concerns are summarised below in the format requested, and information to substantiate these points will be provided in Written Representations.	A full Environmental Impact Assessment has been undertaken and reported in the Environmental Statement submitted with the application for development consent, in accordance with the applicable EIA Regulations.

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		We respectfully urge the Examining Authority to ensure that all of these issues are thoroughly assessed.	This allows the Examining Authority (ExA), appointed by the Planning Inspectorate, to consider environmental effects, both adverse and beneficial, during the examination of the application for development consent. This will help the ExA arrive at its recommendation on the application. Ultimately these issues will be considered by the Secretary of State, who will make the final decision.
PAIN (People Against Intrusive Noise) RR-1133	Noise and Vibration	PAIN believes that any benefits arising from the airport expansion are more than outweighed by the increased levels of noise. Increased aircraft noise will affect both people living close to the airport and further away. The adverse effects include adverse health effects, increased annoyance, reduced amenity, and reduced house prices.	The impact of noise due to increased aircraft movements from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration [AS-080]** of the ES. The effects of the Proposed Development on the health and wellbeing of the local population have been assessed and all reasonably practicable measures have been explored to reduce adverse effects and improve health outcomes. The embedded mitigation, assessment of effects and additional mitigation measures are described in **Chapter 13 Health and Community [AS-078]** of the ES.

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			The effects of the Proposed Development on house prices will be countered through the offer of noise mitigation works set out in the **Draft Compensation Policies, Measures and Community First [AS-050]**. Homeowners are further able to claim for diminution in value of their property due to the physical factors emanating from the new public works. This is set out in Part I of the Land Compensation Act 1973 (Ref 16).
PAIN (People Against Intrusive Noise) RR-1133	Noise and Vibration	• The noise levels presented by the Applicant to support the proposed Development Consent Order (DCO) and in ES Chapter 16 form a crucial part of the evaluation of the noise impact of the airport expansion. The noise levels are predicted using a theoretical noise model (AEDT). A validation exercise was undertaken by the Applicant which showed i) that there are unexplained systematic noise level differences for some aircraft types, and ii) after correcting for the said differences, the measured noise levels at some noise monitor locations agreed well with the predicted levels, whereas others do not.	The noise model has been extensively validated using radar track data and noise measurements, exceeding the requirements for noise model validation set by the Civil Aviation Authority (Ref 11). See Section 6 of **Appendix 16.1** of the Environmental Statement **[AS-096]** for full details of the aircraft noise validation which includes explanations of where there are differences between measured and modelled noise levels and how this has been accounted for in the validation exercise.

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		• No satisfactory explanation has been given for the above differences. It appears that data from those noise monitor stations where agreement was not obtained were removed from subsequent data analysis, with "justifications" that are questionable. Until this matter is resolved PAIN has little confidence in the predicted noise levels, and the findings obtained using those predictions.	
PAIN (People Against Intrusive Noise) RR-1133	Noise Envelope	• There are concerns about the Noise Envelope approach that is being proposed by the Applicant. The proposed approach is not consistent with the recommendations given by the NEDG (which contained local representation).	The Noise Envelope proposals have been developed in consultation with the Noise Envelope Design Group (NEDG) and has taken regard of their recommendations. The Noise Envelope Design Group contains representatives from industry, community groups, local authorities and independent experts. The membership of the NEDG is described in Section 16.4 of **Chapter 16 Noise and vibration of the ES [AS-080]**. Engagement with the NEDG is also described in the NEDG Final Report (see Annex A of **Appendix 16.2 of the ES [APP-111]**). A total of 19 meetings have been held with the NEDG between 2019 and 2022. This engagement is summarised in Section 16.4 of **Chapter 16**

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			Noise and vibration [AS-080] of the ES. Throughout this process, community groups have been represented in the NEDG by the Luton and District Association for the Control of Aircraft Noise (LADACAN) representative and, whilst they were active, the London Luton Airport Town and Village Community Committee (LLATVCC, now disbanded). As part of the NEDG terms of reference, this representation was on behalf of all community groups. The NEDG worked with the LADACAN representative to enable draft proposals to be shared and commented on by other established community groups. The Applicant is pleased to note that there are a large number of recommendations from the NEDG that have been accepted and adopted in the Noise Envelope proposals. Whilst the Applicant has carefully considered all of the recommendations from the NEDG, there are some recommendations which have not been adopted, and in such cases the Applicant has developed alternative proposals based upon relevant best practice, guidance and policy. A summary of the NEDG recommendations and the Applicant responses are provided in Annex B of **Appendix 16.2 of the ES [APP-111]**.

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PAIN (People Against Intrusive Noise) RR-1133	Green Controlled Growth / Noise Envelope	• There are further concerns about the general thrust of the GCG approach, in particular that there is a lack of timely control to be able to halt inappropriate airport expansion, and the process favours industry and the airport operator in almost all respects. For example, the "sharing" of benefits seems to have been interpreted by the airport operator to allow using quieter aircraft as a mechanism simply to enable additional aircraft movements.	The intent of the GCG Framework is to avoid any breaches of the Limits in the first-instance. The potential time-lag is acknowledged and accepted and is a function of the existing legislation and guidance related to slot allocation that the GCG Framework must fit within. It is also important to note that the timings provided in the **GCG Explanatory Note [APP-217]** are worst case and represent the latest possible point at which aspects of the GCG process need to be completed in order to influence the summer season capacity declaration for the following year. There is nothing within the GCG Framework that would prevent the airport operator from implementing mitigation at the airport as soon as they are aware there is a risk of a Threshold or Limit being exceeded. Given the implications of a Level 2 Threshold or Limit being exceeded are significant, it is in the airport operator's interests to address any potential breaches as soon as possible to avoid ongoing constraints on growth.

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			The Noise Envelope includes a defined mechanism to share the noise reduction benefits of future technological improvements in aircraft between the airport and local communities (see Section 3.2 of **GCG Explanatory Note [APP-217]**). This would be controlled through a requirement to review the Limits and Thresholds in 5-year cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance known.
PAIN (People Against Intrusive Noise) RR-1133	Noise and Vibration	• Several of the Applicant's approaches appear to be contrary to local planning Policies, and aviation Policies.	The impact of noise due to increased aircraft movements from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration** of the ES **[AS-080]**. The Proposed Development complies with local policy and national aviation noise policy as set out in the **Planning Statement [AS-122]**.
PAIN (People Against Intrusive Noise) RR-1133	Noise and Vibration	• With regards to ES Chapter 16, PAIN believes that a material omission has been identified from Section 16.12. That is, increasing temperatures caused by global warming will cause a reduction of air density that reduces proportionally engine	Experiencing less lift due to hot weather means that take-off distance (for the same aircraft weight) is increased. Due to the constrained runway length at the airport, it may not be possible to increase take-off distance. As such, aircraft would need to

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		thrust, and lift. To create the same rate of aircraft climb (to minimise the ground level noise at any given point) requires increased engine power, which will result in increased noise levels. Such increased noise levels will inevitably occur near to the airport runway, and also further afield as the aircraft climbs. • The Applicant uses predicted noise levels to justify Luton airport's growth (ES Chapter 16 and Appendix 16.1). Since the above physical mechanism increases those levels, PAIN believes this concern needs to be considered and addressed by the Applicant."	operate under different weight restrictions. However, it should be noted that, hot weather conditions result in increased atmospheric noise attenuation, so increased temperatures are more likely to reduce noise contour size. In any event, the noise impacts would be controlled by the Noise Envelope (see **GCG Explanatory Note [APP-217]**), which would require additional mitigation or noise control to be introduced in the event that noise levels were to increase above the noise contour area Limits.
Paul Spelzini on behalf of South Herts User group RR-1160	Surface Access	We generally support plans to expand Luton airport with one notable exception: Bus connections from Hertfordshire are NON EXISTENT and need to improve drastically to handle proposed traffic levels from the populous Lea Valley towns in particular and provide a direct link to TFL rail and bus services. This should be a planning condition for any consent. We attach a suggested map and timetable to address this shortfall, before the cut off	The Applicant is supportive of measures to improve active and sustainable travel modes and will work with local authorities and bus and coach service providers to implement any improvements wherever reasonably practicable. Further detail on interventions will be provided in future Travel Plans, as outlined in the **Framework Travel Plan [APP-229]**.

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		date of June 30th. We also attach a historic timetable as this was tried back in the 1980s albeit when the airport was much smaller.	The Applicant and Operator are currently developing a suitable and effective funding mechanism that best responds to the vision and objectives of the **Surface Access Strategy [APP-228]** and deliver on selected interventions and measures outlined in the **Framework Travel Plan [AS-131]**. Further details will be shared during the course of the examination, following further consultation with relevant stakeholders on the details of the Sustainable Transport Fund. Improvements to the public transport network require discussion and negotiation with third parties. In the future, the airport operator will work closely with rail and bus service operators through the Airport Transport Forum and development of future Travel Plans, which will set out measures improve services in order to meet future mode share Targets.

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LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	General	We strongly oppose the Luton Rising DCO application. Substantial expansion of the Airport and its capacity is completely out of keeping with its location and the nature of the surrounding area. It would create such significant overall harms that the claimed benefits are outweighed by the social costs and the risk of blight.	A full Environmental Impact Assessment (EIA) has been undertaken and reported in the Environmental Statement submitted with the application for development consent, in accordance with the Infrastructure Planning (EIA) Regulations 2017 (Ref 17). This will allow the Examining Authority and Secretary of State to consider environmental effects, both adverse and beneficial, in its recommendation and decision on the application. The Applicant considers that overall, the benefits of the Proposed Development outweigh the potential harms.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Surface Access	Expansion on this scale would create an unsupportable additional surface transport load around an airport which is poorly sited on a hill with its runway closest to the centre of its town anywhere in the UK other than the two City airports. The closest overflown homes are within just 1.2km of the runway, and much of the housing in South Luton predates the Airport.	A detailed **Transport Assessment [APP-203 to APP-206]** has been produced to support the application for development consent. This assessment has carefully and robustly assessed the forecast impact and effects of surface access related travel to and from the airport and, where relevant and necessary, has proposed measures including AAR, enhanced sustainable transport infrastructure and junction improvements to mitigate against any significant impacts that are forecast to occur. A **Framework Travel Plan (FTP) [AS-131]** has also been prepared, which sets out the structure and approach for Travel Plans (TPs) that will be produced in accordance with the requirements of the **Draft Development Consent Order (DCO) [AS-005]**, to deliver upon the vision and

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			objectives for surface access as the airport expands. This will seek to maximise the opportunities for people to travel to and from the airport by non-car, sustainable means. Whilst the **Surface Access Strategy (SAS) [APP-228]** covers a 20-year period and guides the long-term growth of the airport, the TPs are the 'implementation' of this strategy. TPs will be produced every five years, with specific time-bound Targets for surface access during that shorter time period, supported by a package of interventions and measures to achieve them. The **Green Controlled Growth (GCG) Framework [APP-218]** has been established to make sure that airport growth takes place within defined environmental Limits. The GCG proposals will be legally binding, overseen by an independent body called the Environmental Scrutiny Group (ESG). This GCG Framework was submitted in support of the application for development consent and sets out the necessary processes required for the functioning of the GCG approach and the values of the Limits and Thresholds. GCG will place controls on four key categories of environmental effect: air quality, greenhouse gas emissions, aircraft noise, and surface access. These topics have been selected as the areas where environmental effects will continue to change over time, as passenger

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			numbers grow, and technology improves. Limits have been established for each of the four categories of environmental effects, including surface access, and will be regularly monitored against. If monitoring were to indicate at any point that a Limit was in danger of being breached, then plans must be produced by the airport operator to set out how that breach will be avoided. If any one of the environmental Limits were breached (unless for reasons outside the airport operator's control), further growth will be stopped, mitigation will need to be implemented if required, and ultimately, airport capacity would be constrained until environmental performance returned below the Limits.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Planning	The concessionaire has not since 2014 delivered in a balanced way the growth and mitigation it committed to in an expansion project which has not yet completed, and both the Applicant and Luton Borough Council were complicit in this. The expansion of night flights has already been on an unacceptable scale since 2014, yet the Application now proposes to increase that by a further 70%.	This application for development consent seeks to expand the airport to 32 mppa in line with the Government policy of making best use of existing runways (Ref 6). This application for development consent has been made by the airport owner, Luton Rising, to central Government, it is therefore not appropriate to compare it to historic commitments made in planning applications by the operator. Additionally, the DCO is a Statutory Instrument and as a result the Requirements (planning conditions) set within it will be enshrined in legislation. The proposed **Green Controlled Growth (GCG) Framework [APP-218]** will ensure that the airport

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			operates within particular "Limits". Limits will be set in respect of air quality, noise, surface access and carbon emissions. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the **GCG Framework [APP-218]** submitted as part of this application for development consent. However, one of the GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	General	LADACAN has engaged with the DCO consultations, and participated in the Noise Envelope Design Group on behalf of impacted communities. The message from people living in communities all around the Airport has been clear and consistent: further expansion of Luton Airport is rejected due to its environmental harms. This message has also been strongly endorsed by local authorities such as Hertfordshire County Council and Dacorum Borough Council.	The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, which unless controlled and managed, can impact on surrounding communities. As such, it has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be allowed where Limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the **GCG Framework [APP-218]** and **GCG Explanatory Note [APP-217]** submitted as part of the application for development consent.

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			Regarding environmental impacts associated with the Proposed Development, the Environmental Statement submitted with the application for development consent, provides assessments of a wide range of environmental effects, including benefits and disbenefits. It will be for the Examining Authority to consider the balance between the costs and benefits of the Proposed Development in providing its recommendation to the Secretary of State, based on the evidence submitted with the application and through the Examination process.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Planning	From 2014 to 2019 LLA was not managed responsibly or in the manner required by aviation policy. • Permission was agreed in 2013 for expansion from 9 to 18 million passengers per annum (mppa). • The expansion was to have occurred over a 15-year period sufficient to achieve fleet modernisation. • The Applicant and Luton Borough Council targeted and incentivised accelerated growth from 2014.	These comments are noted and responded to; below; where appropriate. LADACAN further expanded on some of these issues at the Open Floor Hearings. The ExA requested parties, that made submissions at the Open Floor Hearings, to submit a written statement of their comments. The Applicant will respond further to those written submissions at Deadline 2. The **Green Controlled Growth Framework [APP-218]** which will place controls on four key categories of environmental effect: air quality, greenhouse gas emissions, aircraft noise, and surface access will be secured through the Development Consent Order (DCO). Aircraft noise has been selected as one of the four topics where environmental effects will continue to change over time, as passenger numbers grow and technology

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		• Noise contours designed to protect residential amenity were breached in 2017, 2018 and 2019. • Up to 30 flights per day and 13 at night were operated in 2019 in breach of planning consent. • The salami-slicing attempt to legitimise those breaches and create inflated noise baselines ahead of this Application, resulted in a decision which was called-in for an Inquiry in Autumn 2022. • LLA's noise and carbon emissions, and associated staff and passenger surface transport emissions, were at increased levels between 2014 and 2019 as a result of the accelerated growth. • The long-term noise contour reduction strategy required by current expansion planning conditions has not yet been finalised and/or signed off despite being due by 2021.	improves. As part of this, there will be a new, independent, body called the Environmental Scrutiny Group (ESG) to oversee Green Controlled Growth and make sure that it works in practice. If monitoring were to indicate at any point that a Limit was in danger of being breached, then plans must be produced by the airport operator to set out how that breach will be avoided, for approval by the ESG. If any one of the environmental Limits were breached (unless for reasons outside the airport operator's control), further growth will be stopped, mitigation will need to be implemented if required, and ultimately, airport capacity would be constrained until environmental performance returned below the Limits. The Applicant is committed to sharing the benefits of future technological improvements (in terms of aircraft noise reduction) between communities and industry. The benefit of the transition to 'new generation' aircraft (e.g. the Airbus 320Neo and 321Neo and the Boeing 737Max) in the early years of expansion will be shared with the community, with the Noise Envelope Limits to be set at commensurate levels to secure this. The separate planning permission obtained by the Applicant, for Green Horizons Park which is assumed to be the subject of the reference to 'facilitating permissions', is

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		• Industry took the benefits of the accelerated growth in commercial revenues yet LLA failed to install noise insulation at a rate commensurate with its accelerated growth trajectory. • The Applicant has used the commercial benefits of that accelerated growth to fund this Application as well as its associated capital works (DART). • The Planning Department at Luton Borough Council has already granted facilitating permissions (such as the long-term lease of Wigmore Park to the Applicant) to pave the way for this Application.	nothing of the sort. All of the relevant permissions and powers required for the proposed expansion to 32 mppa are contained within this application for development consent. The Green Horizons Park permission is quite separate and, in a no-DCO scenario, is capable of being fully delivered in its own right.
LADACAN (Luton and District Association for the Control of Aircraft Noise)	Noise and Vibration	Noise the annoyance and disturbance it causes cannot adequately be characterised by a single metric, and the use of LAeq contours is but one measure. N-above metrics are equally important. The ExA is	The L_{Aeq} metric is used as the primary assessment metric in line with aviation noise policy (Ref 18) and guidance from the Civil Aviation Authority which states that "evidence based decisions should continue to use $L_{Aeq,16h}$" for daytime (Ref 12) and "there is insufficient evidence to change from the current practice of using average summer night $L_{Aeq,8h}$ noise exposure for UK assessments" for night-time (Ref 13).

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RR-0817		asked to have regard to this in assessing the impacts.	Notwithstanding this, supplementary noise metrics including N-above metrics have been included in the noise assessment presented in **Chapter 16 Noise and Vibration of the Environmental Statement [AS-080]**.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise and Vibration	As site visits have shown, the noise of LLA's flights immediately impacts South Luton and otherwise peaceful rural towns and villages in Hertfordshire and Bedfordshire.	The impact of noise due to aircraft movements from the Proposed Development has been assessed and all practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the Environmental Statement [AS-080]**.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise and Vibration	There is no respite for South Luton, Breachwood Green and St Paul's Walden which are overflown every day of the year either by departures or by arrivals.	The impact of noise due to aircraft movements from the Proposed Development has been assessed and all practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the Environmental Statement [AS-080]**.

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LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Flightpath	Runway alignment means that Stevenage to the East and Whipsnade / Kensworth / Caddington to the West are unavoidably overflown by LLA's arrivals.	This comment is noted. For safety reasons the arrival track necessarily aligns with the runway for the final part of the approach in both an easterly and westerly direction.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Flightpath	Out of date and inefficient airspace design means flights can be held low at 4,000 or 5,000ft for up to 20 miles, so arrivals air noise up to 5,000ft affects people as far away as Biggleswade; departure noise up to 5,000ft affects people as far away as Tring, Hitchin, Letchworth, Welwyn and Hatfield.	The Government is committed to airspace modernisation and is providing funding to support the process (see page 23 of the *Jet Zero Strategy One Year On* report of July 2023 from the Department for Transport). It is intended that this programme will improve the efficiency of airspace management, allowing aircraft to climb more freely, to reduce the impact on the population on the ground. However, the airspace change process is independent of the DCO and, for that reason, the noise implications of the Proposed Development have been assessed based on the current flightpaths and constraints to ensure that the assessment is conservative and reflects a reasonable worst case (absent of airspace modernisation).

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LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise and Vibration	LAeq contours do not indicate (for example) that Caddington experiences peak arrivals noise levels the same as those in Breachwood Green, and so Caddington is disqualified for noise insulation.	In line with Government noise policy (Ref **Error! Bookmark not defined.**), eligibility for the noise insulation schemes is determined based on L_{Aeq} noise exposure. There is no "disqualification" from noise insulation; eligibility is determined by noise exposure. The proposed noise insulation scheme goes over and above noise policy expectations, and extends the insulation scheme substantially further than the current policy operated by the airport. The financial contributions have also been substantially increased. The noise exposure in Breachwood Green and Caddington differs because of the way aircraft fly over these communities to a different extent when on easterly or westerly operations. As shown in Figure A1.1 to A1.3 of **Draft Compensation Policies, Measures and Community First - Appendix A [AS-126]**, the forecast noise insulation eligibility contours do extend over parts of Caddington.
LADACAN (Luton and District Association for the Control of Aircraft Noise)	Noise and Vibration	People are already being forced to move away from communities they otherwise love because of the aircraft noise, and there is a real risk of further expansion creating blight around Luton Airport. The debilitating effects on health and quality of life of noisy flights	The impact of noise due to aircraft movements from the Proposed Development has been assessed and all practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the Environmental Statement [AS-080]**.

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RR-0817		every 90 seconds during waves of early morning departures and late-night arrivals by low-cost airlines is already very keenly felt.	
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise and Vibration	The proposed "busy day" timetable indicating some 554 flights per day by 2043 is significantly more than the 2019 busiest day of 444 (corrected for unconsented movements), and would include larger aircraft than are currently flown, for which local arrivals and departure noise data is not available.	The noise model has been extensively validated using radar track data and local noise measurement data. See **Appendix 16.1 of the Environmental Statement [AS-096]** for full details of the aircraft noise validation. The appendix sets out how local noise data has been used to validate the model for key aircraft types that make up over 75% of the total noise energy at the airport, exceeding the requirements for noise model validation set by the Civil Aviation Authority (Ref 11).
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise and Vibration	We contend that the Application fails to provide effective mitigation of LLA's substantial noise impacts, merely adding window-dressing to what has thus far been operated like a tick-box noise-tax scheme.	The impact of noise (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the Environmental Statement [AS-080]**. The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) contains legally binding daytime and night-time noise contour area Limits and the Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 –

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			06:00) which will be secured through Requirement 27 of the **Draft Development Consent Order [AS-067]**. The Applicant has also substantially extended its noise insulation scheme, including the addition of schemes which will provide the full cost of insulation for habitable rooms in eligible properties exposed above the daytime and night-time Significant Observed Adverse Effect Level (SOAEL). See **Draft Compensation Policies Measures and Community First [AS-128]** for further details.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise and Vibration	Noise insulation is only a form of compensation, not comprehensive aircraft noise mitigation. Noise insulation is ineffective if people open their windows at night in summer, or use a balcony, or are in the garden, or wish to peaceably enjoy a park or outdoor public space affected by overflights.	It is acknowledged that noise insulation is compensatory mitigation, but it is equally important to note that it is only one aspect (and the last to be employed) in the mitigation hierarchy. The noise management and mitigation hierarchy as described in **Appendix 16.2 of the Environmental Statement [APP-111]** is defined to meet the aims of Government noise policy (Ref 19), and to generally minimise noise as far as reasonably practicable. The hierarchy therefore starts with mitigation at source (such as the Noise Envelope) and mitigation by intervention (such as airport boundary screening). These aspects of the mitigation hierarchy benefit both indoor spaces (whether windows are opened or closed) and outdoor spaces (e.g. gardens, balconies and public spaces). Only once these mitigations have been employed is mitigation by compensation (noise insulation) provided to avoid any residual significant effects.

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LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise Insulation Scheme	People have reported numerous failings in the existing noise insulation scheme, and although the Application proposes an "improved" scheme it makes no provision to retro-fit improvements to the properties previously insulated to a lower standard.	The proposed noise insultation scheme does not specifically exclude properties that have been insulated under previous schemes from eligibility. The Applicant will however take into account noise insulation works that have already been carried out to a property when making an assessment of suitability for the noise insulation on offer under the new policy.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise Insulation Scheme	Eligibility for noise insulation is limited and based on LAeq contours rather than on need or on the likely health impacts, informed by latest WHO guidelines and other research.	In line with Government noise policy (Ref **Error! Bookmark not defined.**), eligibility for the noise insulation schemes is determined based on L_{Aeq} noise exposure. UK specific research from the Civil Aviation Authority (Ref 12, Ref 13) shows that there is no evidence to suggest that any noise indicators correlate better with the principal health effects from aircraft noise (daytime annoyance and night-time sleep disturbance) than the L_{Aeq} metric.
LADACAN (Luton and District Association for the Control of	Noise Insulation Scheme	Parked mobile homes such as those near Pepperstock particularly need to be protected by noise insulation because internal noise levels are high, but are not eligible under the proposed scheme.	There is no exclusion in the proposed compensation policy for park homes. All properties within the qualifying contour, wishing to be considered under the noise compensation schemes would be surveyed to see what insulation would be effective. Park homes are equally as eligible for the insulation schemes as other forms of residential property provided that they meet the eligibility criteria outlined in

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Aircraft Noise) RR-0817			**Draft Compensation Policies Measures and Community First [AS-128]**. It is likely that the properties referred to would also be eligible to claim compensation for diminution in value caused by noise from the proposed development. This can be claimed under Part 1 Land Compensation Act 1973.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise and Vibration	Policy requires that industry both reduces and mitigates noise and shares the benefits only as noise levels fall, assessing the noise problem and taking steps to reduce noise where possible, with a particular focus on night noise.	The Noise Envelope includes a defined mechanism to share the noise reduction benefits of future technological improvements in aircraft between the airport and local communities (see **Green Controlled Growth Explanatory Note [APP-217]**). This would be controlled through a requirement to review the Limits and Thresholds in 5-year cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance known.
LADACAN (Luton and District Association for the Control of Aircraft Noise)	Noise and Vibration	There are ways in which noise impacts from LLA could be reduced, which have not been explored to create a more comprehensive mitigation plan, to be implemented ahead of any capacity increase.	All reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration of the Environmental Statement [AS-080]**. The Applicant would welcome further detail of the mitigation measures that LADACAN believes have not been explored.

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RR-0817			
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise and Vibration	The Application has not assessed the benefits of reducing night flights rather than increasing them to an unacceptable degree.	A degree of flying at night is an inherent part of the operations of low fares airlines that are expected to continue to account for a substantial proportion of demand at London Luton Airport. The reasons for this are set out at paragraph 6.6.33 of the **Need Case [AS-125]**. The impact of noise due to night flights has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. This includes the commitment (secured through Requirement 27 of the **Draft DCO [AS-067]**) that the annual number of flights within the night quota period (23:30 – 06:00) will not increase from the current consented limit of 9,650. Further details can be found in **Chapter 16 Noise and Vibration of the Environmental Statement [AS-080]**.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Planning	The concessionaire has not yet completed the fleet modernisation, site works and noise mitigations required under its existing planning permission for capacity expansion to 18mppa.	This application for development consent has been made by the airport owner, Luton Rising, to central Government, it is not appropriate to compare whether or not historic commitments made in separate planning applications by the operator have yet been fully implemented.

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LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Climate Change	Luton Borough Council declared a climate emergency and its website embraces the 2020 Climate Assembly, which concluded that growth in aviation capacity should be restricted to 25-50% by 2050.	Luton Borough Council (LBC) has confirmed its in principle support for the application and the **Planning Statement [AS-122]** provides a summary of how the Proposed Development complies with relevant LBC planning policy. Government policy as set out in the Jet Zero Strategy (Ref 1) is also that there is no need to restrict growth in air transport demand to enable the Government's climate change targets to be met.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise Baseline	Assessments of development impacts can only be relied on if they are sufficiently accurately modelled and calculated with respect to correctly selected baselines. ….. In 2019 the Airport was being operated for the third year running in a non-consented manner, and it makes a mockery of the planning system to default to 2019 baselines in calculating environmental impacts of the current Application, regardless of the decision of the 2022 Inquiry.	The Applicant has undertaken an assessment of likely significant effects in Environmental Impact Assessment (EIA) terms by comparing the situation with the Proposed Development (the Do-Something scenario) to the situation without the Proposed Development (the Do-Minimum scenario or future noise baseline) in each assessment year. The future air noise baseline is compliant with the airport's current consented long term noise limits in each assessment year and therefore demonstrates a scenario where the airport is operating within its consented noise limits. Forecast noise exposure with the development is also compared to the 'current baseline' which is considered to be the actual noise levels in 2019, in line with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref 17) which refers to

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			the baseline scenario as "a description of the relevant aspects of the current state of the environment" in Schedule 4, paragraph 3. However, a sensitivity test using a '2019 Consented' baseline (derived for this purpose by adjusting the fleet mix that occurred in 2019 to reach a modelled noise impact that would sit within the existing 2019 short term Limits) is summarised in **Chapter 16 Noise and Vibration of the ES [AS-080]**. An assessment against both the 2019 Actuals and 2019 Consented baseline has therefore been undertaken. The conclusions of residual significant effects remain the same for both assessments, as significant effects would be avoided through the provision of the full cost of noise insulation.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise Baseline	An estimated 2019 noise baseline has been modelled by substituting less noisy aircraft into the fleet which is an incorrect approach since it does not remove the unconsented excess movements.	The passenger limit was not breached in 2019 so it is considered appropriate to adjust the aircraft fleet mix, rather than the aircraft numbers, to derive the theoretical baseline in which the current consented noise contour area limits were not breached. Adjusting the fleet mix or reducing the number of movements would have a similar outcome as both would result in a noise contour area that was just within the consented noise contour area limits, they would just be derived using different approaches.

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LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise Assessment	Noise modelling has been based on flawed noise measurements by the Applicant's agents coupled with data from the concessionaire with was shown at the 2022 Inquiry to be flawed also.	The noise model has been extensively validated using radar track data and noise measurements, exceeding the requirements for noise model validation set by the Civil Aviation Authority (Ref 11). See Section 6 of **Appendix 16.1 of the Environmental Statement [AS-096]** for full details of the aircraft noise validation. It is not agreed that the data was shown to be flawed at the 2022 inquiry.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise Assessment	The Application identifies one disparity between modelled and measured spot noise values and we have identified others, suggesting that the model is not a sufficiently accurate noise predictor to be relied on for the size and extent of contours nor the numbers of people in LOAEL and SOAEL bands.	The noise model has been extensively validated using radar track data and noise measurements, exceeding the requirements for noise model validation set by the Civil Aviation Authority (Ref 11). See Section 6 of **Appendix 16.1 of the Environmental Statement [AS-096]** for full details of the aircraft noise validation which includes explanations of where there are differences between measured and modelled noise levels and how this has been accounted for in the validation exercise.
LADACAN (Luton and District Association for the Control of	Fleetmix	Next generation aircraft are likelier to be more noisy, not less noisy, than neo counterparts.	There is currently no evidence to suggest that next generation aircraft will get noisier on average. Information in the International Civil Aviation Organization report on Environmental Trends in Aviation to 2050 (Ref 20) suggests that aircraft will continue to get quieter over time as they have done since the 1970s, and predicts a

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Aircraft Noise) RR-0817			decrease in ranging from 0.1 To 0.3 EPNdB per year as a result of next generation aircraft. See Section 12.6 of **Appendix 16.1 of the Environmental Statement [AS-096]** for further information.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Fleetmix	The A321neo creates more noise than expected, and despite references to engine variants Wizz Air (the dominant user of this type at Luton) has not announced plans to re-engine its fleet, but has committed to its Luton fleet being 100% A321neo aircraft by 2025.	The position regarding some variants of the A321Neo is noted. Through discussions with the airport operator and airline operators, it has become apparent that the poor performance is restricted to a particular engine variant of the A321Neo and other engine variants perform as would be expected from noise certification testing. Measured noise data was used to predict A321Neo (assessment Phase 1) noise in the 2027 scenario; however, it is assumed that, by 2039, any issues with the A321Neo performance would be resolved through fleet transition to equivalent aircraft that are no worse than the expected performance from noise certification testing. Consequently, A321Neo predictions for the 2039 and 2043 scenarios were modelled based on the modelling methodology referenced from the Air Noise and Performance (ANP) database (Ref 21). See **Appendix 16.1 of the Environmental Statement [AS-096]** for further information.
LADACAN (Luton and District	Noise Assessment	Contours and corresponding assessments of populations affected will need to be re-run	The noise model has been extensively validated using radar track data and noise measurements, exceeding the

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Association for the Control of Aircraft Noise) RR-0817		following corrections to noise modelling assumptions and data.	requirements for noise model validation set by the Civil Aviation Authority (Ref 11). See Section 6 of **Appendix 16.1 of the Environmental Statement [AS-096]** for full details of the aircraft noise validation. It is not agreed that corrections need to be made and assessments redone.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Cost	Luton Rising is wholly owned by Luton Borough Council and the concession revenues and loans it has used to fund this Application are public money. A monetised WebTAG analysis of the social harms associated with the proposals is therefore appropriate but has not been provided.	A WebTAG analysis is normally associated with assessing the overall value to society of a public sector investment. As the Proposed Development will be a private sector investment funded from airport profits, a full WebTAG appraisal is not required. However, a societal cost/benefit analysis has been presented in Section 8 of the **Need Case [AS-125]**.
LADACAN (Luton and District Association for the Control of Aircraft Noise)	Noise Envelope	The NEDG discussed noise parameters and thresholds, and initial calibration of the AEDT model. Its work was curtailed before completing other tasks necessary to give confidence to the stakeholders. As a result, the NEDG Final Report amounts to little more	It is not agreed that the work of the Noise Envelope Design Group (NEDG) was curtailed and the NEDG issued their Final Report in December 2022. A total of 19 meetings were held with the NEDG between 2019 and 2022. This engagement is summarised in Section 16.4 of **Chapter 16 Noise and vibration of the Environmental Statement [AS-080]**.

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RR-0817		than a description of ways in which noise impacts can be characterised and how early warning triggers could avoid a limit being exceeded. Significant concerns expressed by community groups about the Noise Envelope Design process are documented in Appendix B of APP-111. We assume the envelope limits given in the Application were produced by modelling the forecasts and timescales which the Applicant wishes to achieve: this is not a Noise Envelope footprint agreed in consultation with stakeholders.	Throughout this process, community groups have been represented in the NEDG by the LADACAN representative and, whilst they were active, the London Luton Airport Town and Village Community Committee (LLATVCC, now disbanded). As part of the NEDG terms of reference, this representation was on behalf of all community groups. The NEDG worked with the LADACAN representative to enable draft proposals to be shared and commented on by other established community groups. In response to engagement with the Applicant, and the Applicant's proposals for the Noise Envelope, the NEDG produced an Interim Report (in August 2020) and a Final Report (in December 2022), containing their recommendations for the Noise Envelope and their views on the Applicant's Noise Envelope proposals. These reports are provided in Annex A of **Appendix 16.2 of the Environmental Statement [APP-111]**. The Applicant's response to the NEDG Final report is presented in Annex B of **Appendix 16.2 of the Environmental Statement [APP-111]**. As well as engagement with the NEDG, the Noise Envelope proposals have been widely consulted on through two statutory public consultations.

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			The consultation was open to the public and all community groups. The **Consultation Report [APP-173]** contains a full account of the previous statutory consultation process and issues raised in feedback relating to the Noise Envelope proposals, as well as responses to feedback and how relevant feedback has been addressed in the Noise Envelope proposals. The proposals for the GCG Framework and the Noise Envelope included in the application for development consent are a refinement and improvement of the proposals presented as part of the statutory consultation, taking account of responses to the statutory consultation and recommendations from the NEDG.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Noise Envelope	The Applicant has fundamentally altered the "early warning" Thresholds, which the NEDG agreed should be 85-90% of corresponding Limits, leaving no opportunity for effective corrective action.	It is not agreed that the Green Controlled Growth (GCG) Thresholds leave no opportunity for effective corrective action. It is accepted the Level 1 and Level 2 Thresholds are set close to the GCG noise Limits, but this is necessarily so, as the noise forecasts show that initially the airport would be operating close to (but not in breach of the Limits), if the DCO is approved and the reasonable worst-case assumptions for growth materialise. In setting the Thresholds, the Applicant has sought to balance the need for sufficient 'early-warning' that environmental effects are increasing, and creating a

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			proportionate process for the airport operator and Environmental Scrutiny Group members.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	General	There is widespread concern that the Applicant interfered in the management of the Airport by its targeting and financial incentives whilst not qualified under the Airports Act 1986 to do so.	This is a reference to section 17 of that Act given LADACAN's subsequent submission for **Procedural Deadline A [PDA-008]**. The management of the airport is conducted by London Luton Airport Operations Ltd (LLAOL) under a concession agreement entered into in 1998 and the Secretary of State has directed that section 17(1) does not apply to Luton Rising and hence does not govern the relationship between Luton Rising and LLAOL.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Green Controlled Growth	The recent history militates against Luton Borough Council being the final arbiter in regulating any future growth with balancing limits designed to protect residential amenity and the environment.	This is not proposed to be the case. At present, the airport is operating under a planning consent granted under the Town and Country Planning Act 1990 (TCPA), with planning reference 12/01400/FUL, as amended by 15/00950/VARCON. Under the TCPA, only the local planning authority can bring enforcement action against the airport operator for breach of a condition in planning permission and there are limited requirements for transparency around the enforcement process.

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			As set out in Section 2.4 of the **Green Controlled Growth (GCG) Explanatory Note [APP-217]** it is proposed that governance of GCG will be through a new body established through the DCO, the Environmental Scrutiny Group (ESG). Section 2.4 sets out the proposed functions and membership of the ESG, enshrined through Terms of Reference included at Appendix A of the **Green Controlled Growth Framework [APP-219].** The ESG will be chaired independently, include independent experts, and include representation from Central Bedfordshire Council, Hertfordshire County Council, Luton Borough Council and North Hertfordshire District Council. The GCG process is designed to be self-enforcing in respect of mitigating environmental effects above Limits, with the process designed to require action by the airport operator to address any exceedances of the Limits. However, it is acknowledged that circumstances where the processes set out in the GCG Framework are not followed also need to be considered, and this is set out in Section 2.7 of the **Green Controlled Growth Explanatory Note**. In addition to the GCG process and as outlined in Section 2.7, the statutory enforcement regime for DCOs is set out in the Planning Act 2008. This defines the 'relevant planning authority' for the purposes of enforcement action as the planning authority for the area in which the development is situated. This means the 'relevant planning

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			authority' for most of the Proposed Development must be Luton Borough Council. However, Section 2.7 also sets out ways in which other local authorities could bring action under the Planning Act 2008. In summary therefore, the Green Controlled Growth proposals are considered to include independent, transparent, oversight and scrutiny and represent a significant improvement over current processes.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Green Controlled Growth	The CGC process would be reviewed by the concessionaire rather than by an independent body.	As set out in Section 2.2 of the **Green Controlled Growth Explanatory Note [APP-217]**, Green Controlled Growth (GCG) includes both a requirement for a periodic review of the GCG process, as well as reviews of the environmental Limits and Thresholds at defined intervals (for example, a five-yearly review of noise limits). This is considered an improvement on the current situation where, for example, there is no requirement for periodic review (and if possible, reduction) of the noise limits. It is considered appropriate that this review is undertaken by the airport operator as the body responsible for collecting, processing and reporting environmental monitoring data, as well as producing (where required) Level 2 Plans and Mitigation Plans. Notwithstanding this, any review carried out will be submitted to the ESG for independent oversight and

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			comment, and where the airport operator seeks to modify aspects of the GCG process pursuant to a review, this can only be done with the agreement of the ESG. There will be no ability to change any of the Level 1, Level 2 Thresholds or Limits to permit materially worse environmental effects than those identified in the Environmental Statement. This ensures that GCG can operate effectively over time and the reasonable worst case environmental effects forecast through the Environmental Impact Assessment process will not be exceeded.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Green Controlled Growth	In the case of breach, the concessionaire would suggest a mitigation plan, yet the concessionaire is responsible for operating the Airport without breach.	In the unlikely scenario that a Limit is exceeded, it is considered appropriate for the airport operator to prepare a Mitigation Plan in a way that they consider will be most effective at managing the relevant environmental impact. Notwithstanding this, the Green Controlled Growth (GCG) process includes a requirement for the Environmental Scrutiny Group (ESG) to scrutinise and ultimately approve or reject a Mitigation Plan. The ESG will have the ability to reject a Mitigation Plan where they do not believe that this will result in environmental effect reducing below Limit as soon as is reasonably practicable. In this way, the GCG proposals include a mechanism for mitigation to be proposed and agreed via an independent scrutiny process.

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LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Green Controlled Growth	The ESG chair and chairs of Technical Panels should be nominated by the Joint Host Authorities.	The process for appointing the independent chair of the Environmental Scrutiny Group (ESG) is set out in the ESG Terms of Reference included at Appendix A of the **Green Controlled Growth Framework [APP-219],** and the independent technical experts on Technical Panels in the **Technical Panels Terms of Reference** included at Appendix B **[APP-220].** With respect to the ESG, Paragraph A2.1.11 of the Terms of Reference sets out that unless otherwise agreed, the independent chair should be appointed for a maximum of two 3-year terms. This means that the process for their appointment needs to be replicated periodically. Paragraph A2.1.9 states that the airport operator should consult with the other members of the ESG prior to recommending an independent chair to the Secretary of State. In this way, the view of local authorities on the ESG on an appointment can be captured and reflected in the recommendation. However, for an initial appointment the ESG will not yet be established and so this consultation step cannot take place. At all times, it is proposed that the ultimate responsibility for the appointment of the chair of the ESG will sit with the Secretary of State to ensure independent oversight of the process.

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			For the Technical Panels, Paragraph B2.1.1 of their Terms of Reference states that independent experts will be appointed by the independent chair of ESG. In this way, the Technical Panels will be directly answerable to the ESG rather than being appointed by the airport operator. In both cases, although the airport operator will not directly appoint the chair or technical expert, they will provide funding for their appointment.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Green Controlled Growth	Reporting by Technical Panels to the ESG is only proposed to be annually, and remediation of any noise breach is subject to further delays due to the slot issuing and slots rights process.	The timings provided in the **Green Controlled Growth (GCG) Explanatory Note [APP-217]** are worst case and represent the latest possible point at which aspects of the GCG process needs to be completed in order to influence the summer season capacity declaration for the following year. The timing of the airport's capacity declaration is fixed and cannot be amended by the Proposed Development through the Draft DCO. The GCG timings have, therefore, been established to balance this deadline with the time needed for the airport operator to collect, process and report on monitoring data and the need to allow time for scrutiny of monitoring results (including by the public).This is also no different from the potential lag associated with a breach of the existing planning conditions (i.e. summertime noise contours), for

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			which noise monitoring data covering the whole summer season is similarly not available to inform the following summer season's capacity declaration. Nevertheless, Appendix B to the **Green Controlled Growth Framework** (ESG Technical Panels Draft Terms of Reference) **[APP-220]** sets out that monitoring data should be submitted to the relevant Technical Panels as soon as reasonably practicable. Similarly, there is nothing within the GCG Framework that would prevent the airport operator from implementing mitigation at the airport as soon as they become aware there is a risk of a Threshold or Limit being exceeded. Given the implications of a Level 2 Threshold or Limit being exceeded are significant, it is in the airport operator's interests to address any potential breaches as soon as possible to avoid ongoing constraints on growth.
LADACAN (Luton and District Association for the Control of Aircraft Noise)	Surface Access	Motorists familiar with the area know that the M1 in the regions of J9-J11 is prone to slow running, queues and logjams, with effects that quickly spill over to clog local rural roads also.	The change in traffic flows as a result of the Proposed Development were reviewed for the road links in the strategic model, including those in the vicinity of M1 J10, to identify those links that met the Environmental Impact Assessment (EIA) magnitude of impact thresholds. The impacts on road links in areas surrounding M1 J10 did not meet the thresholds that triggered consideration of significant effects.

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LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Surface Access	The Airport is known to have poor east/west road links, with access often via rural roads and local rat-runs, and fly-parking in the surrounding area is a significant problem.	The Applicant is of the view that local planning authorities have a key role to play in monitoring and managing the impact of off-site car parks, especially in ensuring that a proportionate split between on-site and off-site parking remains and does not result in uncontrolled or unmitigated environmental effects which could undermine the ability of the Applicant to meet Green Controlled Growth Limits.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Surface Access	The north/south rail link is already crowded, and if future rail capacity proves to be inadequate the predicted modal shift from private cars would not materialise.	Please see the rail assessment summaries in section 11.3 of the **Transport Assessment [APP-206]** which shows the impact of increased passenger demand on rail corridors. As noted in Section 11.3 changes in travel behaviour due to the pandemic showed that whilst rail demand is recovering levels of demand remain below pre-pandemic levels. This included season ticket sales remaining at only a third of pre-pandemic levels reflecting changes in demand whereby regular five-day commuting patterns are greatly reduced resulting in greater available capacity**.**
LADACAN (Luton and District	Design	The ground slopes away at either end of the runway, necessitating major earthworks	The Proposed Development will require significant earthworks activities to tie into current levels within the airport.

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Association for the Control of Aircraft Noise) RR-0817		to develop the site, reducing cost-effectiveness and increasing noise, emissions and disturbance caused by works.	The intention is to 'win' this material from areas within the Applicant's land ownership and to avoid, as far as possible, the importation of new fill material reducing noise, emissions and disturbance beyond the Order Limits associated with earthwork activities. This is explained within the **Design and Access Statement Vol II [AS-049]** and the **Construction Method Statement and Programme Report [APP-048]**.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Wigmore Valley Park	Wigmore Valley Park sits on a toxic landfill site, but has matured into a County Wildlife Site and is an important green space in Luton, containing flora including wild orchids.	The Applicant is fully aware of the importance of Wigmore Valley Park and the presence of the historic landfill. Both have been extensively surveyed and characterised and the potential impacts on them assessed, mitigated, and reported in the Environmental Statement Chapter 17 on Soils and Geology including the landfill **[APP-043]** and Chapter 8 on Biodiversity **[AS-027]** The replacement open space and extensive habitat creation is provided to achieve at least 10% biodiversity net gain. Both the open space and habitat will be placed in a new community trust and managed in perpetuity as described in the **Outline Landscape and Biodiversity Management Plan [AS-029]**.

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LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Wigmore Valley Park	The Park was designated as a green buffer between the housing of Wigmore and the Airport.	The design has evolved since initial proposals were presented at consultation and the loss of the park has been minimised in part reflecting responses received as part of the consultation exercise The northern part of the park remains in place between Wigmore and the Proposed Development and will still be improved by proposals permitted under the Green Horizons Park planning permission.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Wigmore Valley Park	The removal of agricultural land to create a substitute Park some distance away reduces residential amenity, and reduces the UK's available agricultural land at a time when food costs are rising	The replacement open space provided as part of the Proposed Development is immediately adjacent to the remaining northern part of the park to the east, rather than the south, and is appropriately designed. The access and car park remains as existing; therefore, access is not affected and residential amenity will be improved by including proper paths to make the whole of the park accessible to those currently unable to access areas, due to limited mobility for example. The effects on agriculture are reported in **Chapter 6 of the Environmental Statement [APP-033]** and can be considered as part of the examination.
LADACAN (Luton and District Association	Need Case	The New Economics Foundation (NEF) finds that alleged economic and jobs benefits are overstated in the Application,	A separate response has been made to the detailed submission from NEF **[RR-1087]** made independently from LADACAN.

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for the Control of Aircraft Noise) RR-0817		while economic downsides and the harms are understated.	
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Need Case	NEF has assessed the 2021 York Aviation report on the "Economic impact of night flying in the UK" and found it failed to consider critical economic impacts. York Aviation advises the Applicant.	The Applicant does not consider this report relevant to the application for development consent. In any event, the environmental impacts of the Proposed Development have been assessed in full in the **Environmental Statement,** with Economics and Employment effects reported in **Chapter 11 [APP-037]**-.
LADACAN (Luton and District Association for the Control of Aircraft Noise)	Health and Community	A holistic assessment is required of the likely heath impacts and consequent social harms of such a substantial increase in night flights (23:00 to 07:00).	Health impacts have been assessed in line with methodologies agreed through EIA Scoping and engagement with local authorities and UKHSA and the findings reported in the **Chapter 13 Health and Community [APP-039] of the Environmental Statement**. This includes the health impacts of aircraft noise which is assumed to be the issue referred to regarding night flights.

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RR-0817			
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Greenhouse Gas Assessment	GHG emissions associated with Application are now forecast as around 50% lower than in the PEIR without explanation or evidence justifying why	The change in outcome of the greenhouse gas (GHG) emissions assessment is due to the publication of the UK Government's Jet Zero Strategy (Ref **Error! Bookmark not defined.**), which occurred after the publication of the Preliminary Environmental Information Report (PEIR) and provided a more detailed understanding of mitigation measures to be included within the subsequent GHG emissions assessment. The PEIR was published in early 2022, before the publication of the *Jet Zero Strategy* in July 2022. As the Jet Zero Strategy High Ambition scenario represents current UK Government policy on aviation, the mitigation measures assumed within this scenario as part of the Strategy were taken into account for the GHG emissions assessment subsequently undertaken in the **Environmental Statement Chapter 12 Greenhouse Gases [APP-038]**. Inclusion of the mitigation measures within the calculations lead to the overall GHG impact being lower in the Environmental Statement compared to the PEIR.
LADACAN (Luton and District	Greenhouse Gas Assessment	If the Applicant is confident in the new GHG modelling then a	The greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK Emissions Trading Scheme (UK ETS) within the European Economic

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Association for the Control of Aircraft Noise) RR-0817		condition to adhere to it should be proposed.	Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the Sixth Carbon Budget and later Carbon Budgets to net zero in 2050.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Greenhouse Gas Assessment	The Jet Zero Strategy is inappropriately treated as a set of policies that can be relied on to reduce aviation emissions, and the Applicant has not modelled alternative pathways.	Carbon emissions for aviation in the Environmental Statement are modelled on the Jet Zero Strategy (Ref **Error! Bookmark not defined.**) High Ambition scenario that does represent current UK Government policy on aviation. The greenhouse gas emissions from departures to destinations within the European Economic Area will be managed and capped by the UK Emissions Trading Scheme (UK ETS). The UK ETS emissions cap applies to a majority of flights departing from London Luton Airport. The global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) applies to all international aviation, and requires aircraft operators to offset their emissions above a baseline level. The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the Sixth Carbon Budget and later Carbon

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			Budgets to net zero in 2050. As the Jet Zero Strategy represents current UK government policy, it was not deemed appropriate to model alternative pathways as part of this assessment.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Greenhouse Gas Assessment	The reliance on carbon pricing policies as a fallback mechanism depends on future policy decisions.	Noted. Current UK Government policy on aviation has been applied to this assessment.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Greenhouse Gas Assessment	The decision not to model non-CO2 impacts is not well justified: these impacts should be modelled and presented for consideration.	Noted. Non-CO2 emissions are discussed within Section 12.12 of **Chapter 12 of the ES [APP-038]**. There remains significant scientific uncertainty around the overall warming effect of non-CO2 impacts. Furthermore, there is no recognised benchmark against which to compare the emissions of non-CO2 impacts. They are not within the Nationally Determined Contributions declared pursuant to the 2015 Paris Agreement or the Carbon Budgets set pursuant to the UK Climate Change Act 2008 (Ref 5), and are not included in

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			the Aviation emissions trajectory for the Jet Zero Strategy (Ref 1) High Ambition scenario that this assessment uses as a comparator for Aviation emissions. For these reasons, this assessment has not sought to quantify non-CO2 impacts, consistent with current Government and Committee on Climate Change advice. Ongoing greenhouse gas emission reporting by the airport will follow all government policy as it evolves on this issue. In the Jet Zero Strategy – one year on report of July 2023 (page 33) (Ref 22), the Department of Transport has made clear that further work is required to understand the impact of aviation's non-CO_2 emissions on climate change. It indicates that consideration is being given to how such impacts could in future be captured within the UK Emissions Trading Scheme.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Funding Statement	The Application is unclear how the £2.7 billion development costs would be funded.	As explained in Section 4.1.1 of the **Funding Statement [TR020001/APP/3.03]** *"The Estimated Total Project Cost is capable of being funded from the net revenues achieved by the airport based on the long-term passenger demand and revenue forecasts after consideration of the anticipated project costs. However, as it will take time for passenger numbers to grow and net revenue surpluses to be realised, finance will be raised to pay for the initial costs of construction at each of the proposed Phases which will be repayable over time."* Sections 4.2 and 4.3 go on to

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			explain the potential approaches for financing Phase 1 and Phases 2a and 2b.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Funding Statement	The Applicant has issued qualified accounts for the last two years, and its auditors resigned in 2021.	The Applicant has published its statutory accounts for year end 31 March 2021 and 31 March 2022 and these are available on the Companies House website. These accounts are presented in accordance with accounting standards and relevant regulation. It is evidenced, from the independent auditors opinion that the Applicant does not have a qualification on its statutory accounts, but rather a qualification or difference of opinion specifically on the valuation of the airport asset for each of the reporting periods. The Applicant has sought independent advice from a top tier real estate valuation team (Deloitte LLP) to value the airport based on a clear valuation methodology. This methodology is agreed in principle by both the Applicant and its auditors. The difference of opinion in valuation is largely driven by the perception of market risk (i.e. discount rate). The Applicant's Board is of the opinion that the airport valuation at the time of reporting is accurate and reflects a true and fair view.

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			The Applicant's Board is entitled and permitted under law to have a difference of opinion from its auditors on matters of materiality. The narrative is well informed on this matter in both sets of statutory accounts. Further to the point relating to the appointment of new auditors. This was an internal decision made by the Applicant's Board to consider the appointment of new statutory auditors. This decision was made on the basis of good corporate governance and professional best practice. The newly appointed statutory auditors, Azets, replaced PwC who were the appointed auditors for many years. The Applicant followed a clear and transparent procurement process. The replacement of auditors is a common practice, as is the resignation of the incumbent upon the appointment of new auditors.
LADACAN (Luton and District Association for the Control of Aircraft Noise)	Funding Statement	Luton Borough Council's auditors have not signed off its accounts since 2018, and its Audit Results Report in 2018 is qualified in respect of financial decision-making on airport-related projects.	The Council's 2018/19 accounts are with the auditors for their final review and the Council's auditors have informed the Audit Committee that they intend to sign the accounts by the end of September 2023. Later audits cannot be finalised until the 2018/19 audit is complete. The Government has acknowledged that there are a significant number of accounts in England which have yet to be audited and the whole local government audit regime

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RR-0817			requires a reset with new deadlines for completion of audit. The Department for Levelling Up, Housing and Communities is expected to bring changes to the law in order to address this issue. The Council is in discussion with its auditors in order to ensure that the accounts are audited. This was discussed at the Council's Audit Committee and they are working with their auditors to resolve this issue. The audit results report in 2018 is not qualified in respect of the financial decision-making on airport-related projects. The Applicant's auditors agree with the company that the cost of the DCO should not be impaired. However, LBC's auditors are of a different view which is not in accordance with the Applicant's advisors auditors. Hence, it has been agreed with the Council's auditors to put a "limitation of scope" paragraph in their audit report. Both the Council and the Applicant are regarded as going concerns and neither set of auditors has raised any issues which put in question the financial resilience of either the Council or the Applicant
LADACAN (Luton and District Association for the	Funding Statement	There is a lack of clarity over future "financial arrangements" referred to by the concessionaire in its qualified Letter of Support.	The Letter of Support from the concessionaire on pages 25 and 26 of Appendix A of the Introduction to the Application **[AS-065]** states that "*LLAOL recognises that in seeking approval for the DCO it is important for the Applicant to demonstrate adequate financial resources are*

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Control of Aircraft Noise) RR-0817			*in place, both in relation to any land acquisition proposed and the wider implementation of the project. Subject to approval being obtained and subject to suitable commercial arrangements being agreed with the Applicant, LLAOL is committed to the development and growth of the airport. Negotiations are ongoing to reach a suitable commercial agreement with The Applicant, which need to be in place prior to development commencing*." This remains the case. It is expected that commercial arrangements are finalised before the DCO is consented, however there is no legal or planning` requirement to do so and it is to be expected that negotiations are ongoing at this stage of the DCO process. Financial agreements will be settled based on market conditions at the relevant time.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Funding Statement	The Applicant has continued to invest heavily in airport-related capital and growth projects despite DLUHC instruction in December 2021 to reduce financial dependency on airport revenue.	The Government instruction referred to was in fact a recommendation to Luton Borough Council. The Applicant is Luton Rising which has continued to invest in projects that were under way at the time in order to bring them to completion. Luton Borough Council's medium-term financial plan has removed dependence on dividend income from its airport subsidiary in accordance with the recommendation from

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			the Department for Levelling Up, Housing and Communities.
LADACAN (Luton and District Association for the Control of Aircraft Noise) RR-0817	Planning	Concerns were raised at the 2022 Inquiry about an overall deficiency in governance particularly in respect of the unresolved conflicts of interest inherent in the ownership of the Airport.	The separation between The Applicant and Luton Borough Council is set out in **Role and Responsibilities of Luton Borough Council [TR020001/APP/8.29]**.

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St. Albans Quieter Skies (STAQS) RR-1416	Planning	STAQS was formed following the previous expansion of the airport from 9.6 million passengers per annum (mppa) to 18mppa in the period to 2019. Whilst passenger numbers dropped in 2021 to 2022 we anticipate that passenger numbers will reach 18 mppa in 2024 if not before. It should be noted that when planning permission was given to expand to 18mppa the application was for 18mppa to be reached in 2028 and not 2019. The rapid increase in passenger numbers and therefore flights in 2013 to 2019 had a significant adverse impact on residents.	This comment does not relate to the Proposed Development subject to this application for development consent.
St. Albans Quieter Skies (STAQS) RR-1416	Noise and Vibration	Although outside of the contour area classified "significantly affected", many of our members are significantly impacted by noise from aircraft departing Luton Airport. We regularly receive reports of night departures waking members from their sleep. Sleep is often cut short by the 6 a.m. rush to depart the airport and maximise the length of the working day for the aircraft. The tranquillity of our gardens is lost from the roar from above. Conversations are put	The impact of noise due to increased aircraft movements during day and night periods from the Proposed Development has been assessed. Further details can be found in **Chapter 16 Noise and Vibration [AS-080]** of the Environmental Statement (ES). The approach to the assessment of noise and tranquillity in line with the National Planning Policy Framework (Ref 7) is set out in Section 16.5 of **Chapter 16 of the Environmental Statement (ES) [AS-080]**.

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		on hold. Even an evening watching television is blighted by noise interruptions. Flight paths to and from Luton Airport impact communities often many miles from the airport. Currently there are no respite routes in operation.	The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) contains legally binding night-time noise Limits and the Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the **Draft Development Consent Order [AS-067]**. The assessment methodology and criteria have been developed following relevant best practice guidance, legislation, and policy, see Section 16.2 and Section 16.5 of **Chapter 16 Noise and Vibration [AS-080]**. Potential adverse likely significant effects can be identified when noise exposure exceeds the Lowest Observed Adverse Effect Level (LOAEL). Planning Practice Guidance: Noise (Ref 23) notes that below the LOAEL no observed adverse effects on health and quality of life occur and states that at this noise exposure: "*Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life*".

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St. Albans Quieter Skies (STAQS) RR-1416	Fleetmix	Further expansion of the airport with increased flight numbers from larger aircraft will make the situation even more frustrating.	The new generation aircraft that carry slightly more passengers than the types they replace are also quieter than the types they replace. Over time, the proportion of the fleet made up of these new generation quieter types is expected to increase as set out in **Table 6.14** of the **Need Case [AS-125]**.
St. Albans Quieter Skies (STAQS) RR-1416	Noise and Vibration	Mitigation LLA proposes mitigation in the form of noise insulation to those living closest to the ends of the runway. We will leave it to others to explore the effectiveness and desirability of this mitigation, which requires residents to live indoors and with windows closed. Many more, who live beyond the contours will be affected by overflights, including schools, businesses, care homes, and residential properties will suffer significant noise increases impacting health and quality of life.	The impact of noise due to increased aircraft movements during day and night periods from the Proposed Development has been assessed. Further details can be found in **Chapter 16 Noise and Vibration [AS-080]** of the Environmental Statement (ES). Noise insulation is the last resort in the mitigation hierarchy, as set out in Section 2 of **Appendix 16.2 Operational Noise Management (Explanatory Note) [APP-111] of the Environmental Statement (ES)**. The hierarchy therefore starts with mitigation at source and mitigation by intervention (which benefit both indoor and outdoor exposure) before mitigation by compensation (noise insulation) is provided. The noise insulation packages will include suitable ventilation if required to allow windows to be kept closed.

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			The Applicant is putting forward an industry-leading scheme to help deal with the implications of aircraft noise that would arise from delivery of the proposals set out in its application. The Draft **Compensation Policies Measures and Community First [AS-128]** provides information on the noise insulation eligibility criteria. Properties that are eligible include residential properties, nursing homes, schools, libraries, and places of worship (should they meet the eligibility criteria set out in the document).
St. Albans Quieter Skies (STAQS) RR-1416	Fleet mix	Fleet Mix and Modernisation The assumptions relating to noise are reliant on the modernisation and changes to the fleet of aircraft using the Airport. This is outwith the control of the airport and neither the fleet mix, nor the timescale for delivery can be relied upon.	The assumptions underpinning the transition to the new generation quieter fleet of aircraft are based on airline orders for replacement aircraft and informed by discussions with airlines as set out in **Section 6** of the **Need Case [AS-125]**. In any event, the **Green Controlled Growth Framework [APP-218]** means that if these new generation aircraft do not operate at the Airport as expected, the airport will be prevented from growing beyond the established noise Limits.
St. Albans Quieter Skies (STAQS)	Fleet mix	In terms of the claims of newer aircraft being less noisy, there is evidence that the A321Neo has not performed as expected	The noise implications of the Proposed Development have been assessed based on the actual noise performance of the A321neo

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RR-1416		when flying out of Luton Airport. Across this area, local Community Noise Reports show that A321neo is no quieter than the A321ceo model that it supersedes.	fleet at London Luton Airport but account has been taken of the likelihood that Wizz Air will be replacing its fleet again on an approximately 14 year cycle (as is common for low fare airlines) and that replacement aircraft would have an improved noise performance. This is explained in **Chapter 16 Noise and Vibration [AS-080]** of the Environmental Statement.
St. Albans Quieter Skies (STAQS) RR-1416	Fleet mix	The assumption that larger aircraft will be carrying more passengers and thus will reduce the overall number of flights is also unreliable and may be likely to lead to more noise with a greater size and load.	It is not assumed that larger aircraft will result in fewer flights, but rather will allow for passenger growth. The noise implications of the expected changed to the fleet of aircraft have been taken into account in modelling the noise effects as set out in **Chapter 16 Noise and Vibration [AS-080]** of the Environmental Statement.
St. Albans Quieter Skies (STAQS) RR-1416	Noise Modelling	Noise Modelling STAQS has concerns about the reliability of the noise modelling and the assumptions made. Previous noise modelling has not been accurate and there is a risk that the breaches of noise contours in three consecutive years (prior to Covid) may well be repeated.	The noise model has been extensively validated using radar track data and noise measurements, exceeding the requirements for noise model validation set by the Civil Aviation Authority (Ref 11). See Section 6 of **Appendix 16.1 of the Environmental Statement [AS-096]** for full details of the aircraft noise validation.

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			The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) has been designed to improve upon the existing noise control regime and to effectively prevent breaches from occurring. **Appendix 16.2 Operational Noise Management (Explanatory Note) of the Environmental Statement [APP-111]** sets out how the proposed Noise Envelope contains mechanisms that should have avoided the noise Limit breaches that occurred at the airport from 2017-2019. This is further elaborated on in the **Comparison of consented and proposed operational noise controls document [AS-121]** which provides a direct comparison between the current and proposed operational noise controls, noting that the Noise Envelope provides several enhancements to the current consented noise controls that are designed to prevent breaches before they occur, such as independent scrutiny and oversight, increased transparency, adaptive mitigation and management plans and noise Limit reviews.
St. Albans Quieter Skies (STAQS)	Noise Envelope	STAQS was a signatory to the community group feedback on the Noise Envelope Design Group (NEDG) report, which is included as an appendix to that report in	The Noise Envelope proposals have been developed in consultation with the Noise Envelope Design Group (NEDG) and has taken regard of their recommendations. The

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RR-1416		document TR020001/APP/5.02 As set out in the following paragraphs in that response STAQS and other community groups consider that: 12) Community stakeholders have significant reservations about whether the current and limited exercise meets the necessary standard for consultation on a noise envelope design.	Noise Envelope Design Group contains representatives from industry, community groups, local authorities and independent experts. The membership of the NEDG is described in Section 16.4 of **Chapter 16 Noise and vibration of the ES [AS-080]**. Engagement with the NEDG is also described in the NEDG Final Report (see Annex A of **Appendix 16.2 of the ES [APP-111]**). A total of 19 meetings have been held with the NEDG between 2019 and 2022. This engagement is summarised in Section 16.4 of **Chapter 16 Noise and vibration [AS-080]** of the ES. Throughout this process, community groups have been represented in the NEDG by the Luton and District Association for the Control of Aircraft Noise (LADACAN) representative and, whilst they were active, the London Luton Airport Town and Village Community Committee (LLATVCC, now disbanded). As part of the NEDG terms of reference, this representation was on behalf of all community groups. The NEDG worked with the LADACAN representative to enable draft proposals to be shared and commented on by other established community groups.

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			The Applicant is pleased to note that there are a large number of recommendations from the NEDG that have been accepted and adopted in the Noise Envelope proposals. Whilst the Applicant has carefully considered all of the recommendations from the NEDG, there are some recommendations which have not been adopted, and in such cases the Applicant has developed alternative proposals based upon relevant best practice, guidance and policy. A summary of the NEDG recommendations and the Applicant responses are provided in Annex B of **Appendix 16.2 of the ES [APP-111]**.
St. Albans Quieter Skies (STAQS) RR-1416	Noise Envelope	13) Most groups consider it unhelpful to blur the boundary between the noise envelope process and limits, and the separate topic of so-called Green Controlled Growth, and want to see the parameters and the controls for the Noise Envelope clearly defined in isolation.	First it is important to note that the design and content of the Noise Envelope is not affected by its inclusion within the **Green Controlled Growth (GCG) Framework [APP-218]**, and it is considered that the benefits of integration outweigh the additional 'visibility' of having a standalone Noise Envelope. The key advantages of integrating the Noise Envelope within the GCG Framework are that the enforcement, control and reporting processes set out within GCG will automatically apply to the Noise Envelope, avoiding the need for duplication of processes

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			and enforcement bodies and providing consistency across the four topics covered by the GCG Framework (noise, air quality, carbon and surface access). The GCG noise Technical Panel that would be formed under the GCG Framework allows for suitable independent technical expertise to be involved in the review and enforcement processes without the need for separate arrangements to those in GCG for a stand-alone Noise Envelope.
St. Albans Quieter Skies (STAQS) RR-1416	Noise Modelling	14) Community stakeholders have little confidence that noise modelling will be accurate due to deficiencies in noise monitoring and modelling at Luton Airport (one already identified by Luton Rising) and a lack of transparency over the calibration of the AEDT model using the data from INM and from the Airport.	The noise model has been extensively validated using radar track data and noise measurements, exceeding the requirements for noise model validation set by the Civil Aviation Authority (Ref **Error! Bookmark not defined.**). See Section 6 of **Appendix 16.1 of the Environmental Statement [AS-096]** for full details of the aircraft noise validation. To date, the airport operator have produced their noise contours with the Integrated Noise Model (INM) software, which was replaced by AEDT in 2015. Both software packages were produced by the US Federal Aviation Administration (FAA). INM is no longer supported by the FAA and is considered to be

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			a legacy software package. Therefore, AEDT was used to produce noise contours for pre-application assessments and in **Chapter 16 of the Environmental Statement [AS-080]**. Details on the differences between INM and AEDT are provided in Section 6 of **Appendix 16.1 of the Environmental Statement [AS-096]**.
St. Albans Quieter Skies (STAQS) RR-1416	Noise and Vibration	15) Community stakeholders have little confidence in forecast noise reductions because no information is provided about how the use of quieter aircraft will be incentivised; and next generation aircraft are not likely to be noise-reduced.	The average lifespan of budget airline aircraft ranges from approximately 10 to 15 years, so quieter aircraft come into service through natural fleet transition. This fleet transition has been observed in 2023 where, to date, approximately 31% of the fleet are made up of new generation aircraft. Information from the International Civil Aviation Organization suggests that next-generation aircraft will continue to show reduction in noise (Ref 20), see Section 12.6 of **Appendix 16.1 of the Environmental Statement [AS-096]** for further information. However, as a reasonable worst case the noise assessment in **Chapter 16 of the Environmental Statement [AS-080]** assumes that next-generation aircraft will be no quieter than the new-generation aircraft that they replace.

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St. Albans Quieter Skies (STAQS) RR-1416	Noise and Vibration	16) Community stakeholders note that in the period 2014-2019, the Airport took the commercial benefits of growth without delivering sufficient noise mitigation through introduction of less noisy aircraft, and that this deficit needs to be made good before Luton Airport is entitled to share in any future benefits as noise reductions occur through new technology.	The Applicant is committed to sharing the benefits of future technological improvements (in terms of aircraft noise reduction) between communities and industry. The benefit of the transition to 'new generation' aircraft (e.g. the Airbus 320Neo and 321Neo and the Boeing 737Max) in the early years of expansion (phase 1) will be shared with the community, with the Noise Envelope Limits to be set at commensurate levels to secure this. For the later years of expansion (phase 2 and onwards), the Noise Envelope includes a defined mechanism to share the noise reduction benefits of future technological improvements in aircraft between the airport and local communities. This would be controlled through a requirement to review the Limits and Thresholds in 5-year cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance known.
St. Albans Quieter Skies (STAQS) RR-1416	Noise Envelope	17) Community stakeholders strongly disagree with the unilateral decision of Luton Rising to depart from the Noise Envelope design put forward in the NEDG interim report – particularly in light of information from the Airport Operator that	The Applicant is pleased to note that there are a large number of recommendations from the NEDG that have been accepted and adopted in the Noise Envelope proposals. Whilst the Applicant has carefully considered all of the recommendations from the NEDG, there are some recommendations which have not been

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		more flights are likely to occur outside the 92-day summer period.	adopted, and in such cases the Applicant has developed alternative proposals based upon relevant best practice, guidance and policy. A summary of the NEDG recommendations and the Applicant responses are provided in Annex B of **Appendix 16.2 of the ES [APP-111]**.
St. Albans Quieter Skies (STAQS) RR-1416	Planning	18) Community stakeholders are firmly of the view that effective and independent oversight and scrutiny is required given the recent planning history, and recommend that community representation is included.	The **Green Controlled Growth Framework [APP-218]** will place controls on four key categories of environmental effect: air quality, greenhouse gas emissions, aircraft noise, and surface access will be secured through the Development Consent Order (DCO). As part of GCG there will be a new independent body called the Environmental Scrutiny Group (ESG) to oversee GCG and make sure that it works in practice.
St. Albans Quieter Skies (STAQS) RR-1416		19) Community stakeholders recommend an initial review after just three years.	In order to ensure that the Green Controlled Growth framework remains relevant over time, Paragraph 25 of Schedule 2 of the **Draft Development Consent Order [AS-067]** sets out that the GCG process should be reviewed periodically by the airport operator. The first such review should be undertaken within 12 months of the end of the Transition Period, and then on a five-yearly basis from this point.

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St. Albans Quieter Skies (STAQS) RR-1416	Planning	20) Community stakeholders do not believe that the approach taken to this 'consultation' engenders trust. Balanced Approach The UK Government accepts the principle of the "balanced approach" advocated by the ICAO – that the introduction of quieter aircraft can be used to enable growth in aviation while maintaining a balance on the noise impact on communities overflown. The 2013 planning permission recognised this balance and forecast growth linked to the introduction of what were at that time known as "next generation" aircraft. Within weeks of planning permission being obtained, Luton Borough Council entered into a Growth Incentive Scheme to compensate the Airport Operator for accelerating growth by discounting fees to airlines, with the intention of achieving the permitted passenger cap of 18M passengers per annum by 2020. This scheme was successful in achieved the 18M passenger throughput in 2019, a full 9 years ahead of forecast and before the modernisation of the aircraft fleet that would be necessary to remain within the noise contour limits in the planning	The Applicant is committed to sharing the benefits of future technological improvements (in terms of aircraft noise reduction) between communities and industry as stated in **Chapter 16 Noise and Vibration [APP-042]** of the Environmental Statement (ES). The benefit of the transition to 'new generation' aircraft (e.g. the Airbus 320Neo and 321Neo and the Boeing 737Max) in the early years of expansion will be shared with the community, with the Noise Envelope Limits to be set at commensurate levels to secure this. The Noise Envelope also contains a mechanism for the Limit to be reduced in future years (beyond the 2030s) if 'next generation' aircraft are quieter than existing 'new generation' types, or an airspace change is implemented that would enable lower noise levels to be achieved than that forecast in the reasonable worst-case assessment reported in the ES. This would be controlled through a requirement to review the Limits and Thresholds in 5-year cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance known.

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		permission, based on growth forecasts to 2028. In consequence, the night noise contour planning condition was exceeded in 2017, 2018 and 2019, with the day noise contour being equalled in 2019. Luton Borough Council chose to take no enforcement action following these breaches. Having totally disregarded any attempt to deliver "balance", the Airport Operator was invited to apply for increases in the capacity limit and the noise area contours to permit further expansion – at a time when the original permission had indicated that noise reductions could and should be delivered. Luton Borough Councils approval of a further increase was not surprising, but even before the Government has determined the outcome of the Inquiry by the Planning Inspectorate into that decision, we have this further application for a new terminal and a further near doubling of passenger capacity.	The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) has been designed to improve upon the existing noise control regime and to effectively prevent breaches from occurring. **Appendix 16.2 Operational Noise Management (Explanatory Note) of the Environmental Statement [APP-111]** sets out how the proposed Noise Envelope contains mechanisms that should have avoided the noise Limit breaches that occurred at the airport from 2017-2019. This is further elaborated on in the **Comparison of consented and proposed operational noise controls document [AS-121]** which provides a direct comparison between the current and proposed operational noise controls, noting that the Noise Envelope provides several enhancements to the current consented noise controls that are designed to prevent breaches before they occur, such as independent scrutiny and oversight, increased transparency, adaptive mitigation and management plans and noise Limit reviews.

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St. Albans Quieter Skies (STAQS) RR-1416	Planning	As owners of the airport, and also the local planning authority, Luton Borough Council has demonstrated that they have no intention of maintaining a "balanced approach".	This is outside of the Applicant's control and we cannot comment on it. Luton Borough Council is not the decision maker in this application. GCG introduces more collaborative and transparent decision making involving several neighbouring planning authorities as well as independent expert advice.
St. Albans Quieter Skies (STAQS) RR-1416	Need Case	The impact on the wider population continues to be downplayed and the economic benefits overstated.	The environmental implications of the Proposed Development are fully set out in the Environmental Statement and it is considered that the assessment of the economic benefits is robust.
St. Albans Quieter Skies (STAQS) RR-1416	Noise and Vibration	Capacity increases are being justified on the basis of the noise impacts being "imperceptible" to the human ear, because of the logarithmic nature of the decibel metric. They hide the fact that that many additional flights can be flown (each causing annoyance) without the noise impact being what the noise experts classify as "perceptible".	The impact of noise due to increased aircraft movements during day and night periods from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration [APP-042]** of the Environmental Statement (ES). The air noise assessment was undertaken following national policy requirements to define effects on health and quality of life in terms of the $L_{Aeq,T}$ metric over the 16-hour daytime period and the 8-hour night period. Supplementary metrics (N-above, overflights

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			and probability of sleep disturbance) have been used to expand the assessment of likely significant air noise effects and provide context for the non-technical reader. The assessment of supplementary noise metrics do not alter that identification of likely significant effects based on the $L_{Aeq,T}$ metric.
St. Albans Quieter Skies (STAQS) RR-1416	Noise and Vibration	Legislation and Policy In respect of noise impact overall, this proposal is contrary to National Planning Policy Framework, and the Aviation Noise Policy Framework for England, which aim to reduce the number of people significantly affected by the adverse impacts of noise. It is also contrary to Luton Local Plan policies and the Luton Airport Noise Action Plan 2019-2023 which variously states that LLAOL will, with respect to the night-time contour "Limit and where possible reduce the population within the contour over the course of the action plan" and will "operate within our agreed contour limits" and will "develop a noise contour reduction strategy to define methods to reduce the area of the noise contours".	The applicant considers that the Proposed Development is fully compliant with UK aviation noise policy and emerging policy, as set out in the **Planning Statement [AS-122]**. The Noise Envelope includes a defined mechanism to share the noise reduction benefits of future technological improvements in aircraft between the airport and local communities (see **Green Controlled Growth Explanatory Note [APP-217]**). This would be controlled through a requirement to review the Limits and Thresholds in 5-year cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance known.

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St. Albans Quieter Skies (STAQS) RR-1416	General	For the above reasons, STAQS objects strongly to the proposed expansion of the airport.	The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport. As such, it has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the **GCG Explanatory Note [APP-217]** submitted as part of this application for development consent. The Environmental Statement provides assessment for a wide range of environmental effects. Further details can be found in **Chapter 16 Noise and Vibration [APP - 042]** of the ES.
The Institution of Engineering and Technology	Land Acquisition	The IET assumes that it is a category 3 person for the purposes of section 56(2)(d) of the Planning Act 2008. The IET understands that none of its land or	The assumption made is accurate. IET is a category 3 person for the purposes of section 56(2)(d). This is confirmed in Part 2 of the Book of Reference [APP-011].

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RR-1510		interests in land is required for the Proposed Development and that the Applicant is not proposing to use compulsory acquisition powers to acquire its property.	
The Institution of Engineering and Technology RR-1510	Surface Access	The IET's Head Office is located at King's Way, Stevenage. The office accommodates approximately 480 staff. Staff commute to the office from a number of locations, including West Midlands and Northamptonshire utilising major traffic routes which include the A1(M) and the A602. 3. Summary of IET's main issues and impacts 3.1 The IET's Head Office is located in close proximity to and accessed via the A1(M) and A602. The town of Stevenage is located approximately 6 miles south of Hitchin. 3.2 Whilst the IET does not object to the principle of the Proposed Development, it requires a better understanding of the likely impacts of the Proposed Development on its property and business, in particular, as a result of construction as well as operational traffic arising from the scheme.	The Applicant considers impacts of construction traffic on the highway network in **Appendix 4.2 Code of Construction Practice (CoCP) [APP-049]** of the ES, and includes detail on construction traffic, construction routes and closures and any impact on emergency service vehicles. Most works are located off the highway network and detailed construction management plans would be developed once the DCO is granted. In advance of construction, the Applicant will continue to consult with highway authorities and key stakeholders.

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The Institution of Engineering and Technology RR-1510	Surface Access	3.3 Chapter 18, paragraph 18.9.8 of the Environmental Statement provides as follows: "It is possible that some construction traffic may use the A505/A602 route to connect with the A1 corridor, but this would be limited by the CTMP which will discourage any construction traffic, other than that which would have an unrealistic diversion, from using the route.' 3.4 Noting the proximity of its Head Office to the A602 and A1(M), the IET wishes to understand what construction routes are proposed by the Proposed Development, alongside the likely impacts of the construction traffic associated with Proposed Development on its business.	Information on predicted levels of construction traffic is provided in Chapter 18 of the ES [AS-030]. Estimates of construction traffic over the three construction phases 1, 2a, and 2b are set out in Table 18.5. An expected distribution on the highway network by time of day is shown on Insets 18.6, 18.10 and 18.14 for those same assessment phases. Over the periods when construction is taking place, the average number of daily construction movements, that is the sum of vehicles arriving at the construction sites and leaving them, is predicted to be around two hundred which is spread over a twelve hour period but with just under three quarters expected to occur between 10:00 and 16:00 which is outside of the typical commuter peaks. During the three month period with the highest level of construction vehicle activity, the daily rate could increase to around 450 vehicle movements with a peak hour flow of construction traffic of around 70 vehicles occurring in the middle of the day. It is expected that the most attractive route for the great majority of construction traffic will be the M1 which is conveniently connected to the airport by the A1081 New Airport Way which provides a dual carriageway connection

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			between the motorway and the airport. The Outline Construction Traffic Management Plan [APP-130] sets out in Section 4.2 the principles to be adopted for the designation of routes to be used by construction traffic with a principal consideration being the minimisation of travel along any road that does not form part of the Primary Route Network (PRN). In paragraph 4.2.3. the A505/A602 corridor that forms part of the Primary Route Network and provides a link between the A1(M) and the airport is recognised as a route that may be used by construction traffic to a limited extent. In considering the specific point regarding the impacts of the construction traffic associated with Proposed Development on the business of the Institution of Engineering and Technology it is useful to consider the level of construction traffic that might be involved. As mentioned above, during the busiest quarter year period, the highest predicted hourly flow, that includes construction traffic both going to and from the airport, is around seventy vehicles of which 45 would be heavy goods vehicles (HGV). Only a small proportion of these would be travelling along the A505/A602 corridor. In a typical hour it is likely that the number of construction vehicles travelling in

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			either direction along the corridor could be counted in single figures. The effect within Stevenage would be negligible.
The Institution of Engineering and Technology RR-1510	CTMP	It also wishes to have assurances that the A505/A602 route will not be used during construction.	The A505/A602 corridor forms part of the Primary Road Network and as such there will not be a blanket ban on construction traffic using it. However those operators wishing to use the corridor will have to demonstrate that there is a sound reason for its use.
The Institution of Engineering and Technology RR-1510	CTMP	3.5 In addition, paragraph 4.2.3 of Appendix 18.3 of the Environmental Statement (the outline Construction Traffic Management Plan ("CTMP")) indicates that there will be some use of roads around Stevenage (as well as Hitchin, Letchworth and Baldock). For the same reason set out in paragraph 3.4 above, the IET wishes to understand precisely which roads are proposed to be used within Stevenage and how impacts on its business are proposed to be mitigated and managed by the Applicant.	As indicated in an earlier response the construction traffic flows on roads around these towns will be very small and the only traffic that will be permitted to use roads that do not form part of the PRN will be at the beginning or end of a journey when the origin or destination is not on the PRN.
The Institution of Engineering and Technology RR-1510	Surface Access	3.6 The IET is also concerned about the impacts of increased traffic in and around Stevenage following operation of the Proposed Development.	The Applicant reviewed the change in traffic flows as a result of the Proposed Development for the road links in the strategic model, including those in the vicinity of Stevenage, to identify those links that met the EIA magnitude

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			of impact thresholds. The impacts on road links in areas surrounding Stevenage did not meet the thresholds that triggered consideration of significant effects.
The Institution of Engineering and Technology RR-1510	Surface Access	The IET is concerned about construction traffic associated with the Proposed Development, as well as increased traffic during operation.	The Applicant expects that the majority of construction vehicles would be routed via the A1081 and M1 but there may be some construction traffic that arrives via local routes. However, supplier locations are not known at the planning stage. The CTMP would be agreed with the relevant highway authorities at the delivery stage and prior to construction commencement. The change in traffic flows as a result of the Proposed Development were reviewed for the road links in the strategic model, including those in the vicinity of Stevenage, to identify those links that met the EIA magnitude of impact thresholds. The impacts on road links in areas surrounding Stevenage did not meet the thresholds that triggered consideration of significant effects.
The Institution of Engineering and Technology	General	The IET would be interested to participate during Examination in relation to any transport assessment review, discussions relating to the CTMP, local impact reports	Noted.

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RR-1510		and written traffic related topics and discussions. 4.3 Please note that further issues may also need to be raised during the Examination and the IET respectfully reserves the right to appear at any associated issue-specific or open-floor hearing.	

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Surrey Street Primary School RR-1458	Noise & Vibration	I am not convinced by the statement "The effects on these schools are therefore considered to be not significant. Surrey St Primary and the Avenue Centre for Education are within the 63dBLAeq,16h contour and will therefore be eligible for noise insulation which will improve the internal acoustic conditions within the school." Also, internal acoustic conditions	Noise insulation is the last resort in the mitigation hierarchy, as set out in Section 2 of **Appendix 16.2 Operational Noise Management (Explanatory Note) [APP-111] of the Environmental Statement (ES)**. The hierarchy therefore starts with mitigation at source and mitigation by intervention (which benefit both indoor and outdoor acoustic conditions) before mitigation by compensation

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		does not help when the children are outside, or on warm sunny days, when there is a need to open windows to cool down or put in air-conditions units that would increase energy usage.	(noise insulation) is provided. The noise insulation packages will include suitable ventilation if required to allow windows to be kept closed.
Surrey Street Primary School RR-1458	Air Quality	Also the school backs onto Airport Way which would have greater traffic usage and therefore increased population [pollution], Luton has three Declared Air Quality Management Areas, will this become number four if the expansion goes ahead?"	The air quality assessment **Chapter 7 [APP-034]** has provided an assessment of air quality in Luton following the methodology agreed with the local councils, including an assessment of Air Quality Management Areas along the modelled road network. The Surrey Street Primary School buildings where children would spend the majority of their time are located approximately 250m from Airport Way, and the playing fields are located 20m from Airport Way. Modelled air pollutant concentrations at the closest modelled receptor (receptor H142, situated 34m from the southern carriageway of Airport Way) which is located in the area near Surrey Street Primary School are well below the relevant air quality objectives in all assessment years, and no significant impacts are predicted to occur. Air quality monitoring has been undertaken at Surrey Street Primary school since March 2023 by the applicant. Preliminary results indicate that NO_2 concentrations are well below the air quality

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			objective at this location (non-bias adjusted and non-annualised measurements). Therefore, no additional Air Quality Management Areas are likely to be implemented as a result of the project.
Sustainable St Albans RR-1483	Climate Change	There is a climate and environmental crisis, caused by emissions of so called greenhouse gases, principally arising from the exploration for and the burning of fossil fuels, such as aviation fuel. Climate change is already causing and significantly exacerbating floods, drought, wild fires, crop failure and hurricane damage across the globe, with devastating losses of life and huge impoverishment of the quality of life of those worst affected. The only meaningful (and highly practical) way to mitigate these effects is to reduce and then eliminate the burning of fossil fuels, including by aeroplanes. We acknowledge that the UK government's climate committee carbon budget envisages modest increases in aviation, but you must equally acknowledge that there is currently sufficient airport capacity in the UK to absorb that budget without any airport expansion.	The Government has been clear that climate change targets can be met without seeking to restrict demand. This was made clear in the Government's Response to the Committee on Climate Change's 2022 Annual Report published in March 2023 where it was stated that *"We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth."* (Ref 2) A lifecycle GHG impact assessment has been undertaken in line with the principles for environmental impact assessment and compliance with the Airports National Policy Statement, as presented in **Chapter 12 Greenhouse Gases** of the ES **[APP-038]**, including mitigation measures to reduce the impact of GHG emissions.

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		The only responsible course of action available to Luton Airport is to continually reduce the number of aeroplane movements, and to make a well publicised virtue of such a plan. We oppose any expansion of Luton Airport.	Carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy (Ref 1) High Ambition scenario that represents current UK Government policy on aviation. Ultimately the greenhouse gas emissions from aviation at London Luton Airport will be managed and capped by the UK Emissions Trading Scheme (UK ETS) within the European Economic Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050.
The Harpenden Society RR-1506	Noise and Vibration	The Harpenden Society is a membership organisation of about 900 members. Growth a Luton Airport will significantly impact our community, villages nearby and our members directly, most notably through increased noise and congestion on the roads and railways and indirectly through increased greenhouse gases.	The impact of noise due to increased vehicular and aircraft movements (day and night) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in **Chapter 16 Noise and Vibration [AS-080]** of the ES. The Noise Envelope (see **Green Controlled Growth Explanatory Note [APP-217]**) contains legally binding daytime and night-time noise contour area Limits and the Applicant has committed to retaining the

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			current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the **Draft Development Consent Order [AS-067]**. **Chapter 12 Greenhouse Gases** of the ES **[APP-038]** details the impacts of GHG emission from the Proposed Development and mitigation measures to reduce any impacts.
The Harpenden Society RR-1506	Need Case	Furthermore, the applicant, Luton Rising, has failed to articulate a reasonable balance between the economic benefits of growth and the clear and substantial environmental costs. In addition, Luton Rising does not have either the management skills or access to funding to achieve the applications proposals and there are considerable doubts as to the support of either the existing concessionaire or a different concessionaire to achieving the applications goals, not least because there is little evidence of the demand the application assumes, other London airports are planning to grow in geographic areas where Luton Airport needs to capture customers and there is considerable	The planning balance between the benefits and environmental costs of the Proposed Development is set out in the **Planning Statement [APP-194]**. A full Environmental Impact Assessment has been undertaken and reported in the Environmental Statement submitted with the application for development consent, in accordance with the applicable EIA Regulations. This allows the Examining Authority to consider environmental effects, both adverse and beneficial, in planning decisions. The airport is professionally operated by London Luton Airport Operations Ltd through a concession agreement with Luton Rising. Development of the airport would be undertaken by the airport operator. The

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		uncertainty as to whether the government's Jet Zero targets can be achieved without demand management being introduced.	**Funding Statement [APP-012]** sets out a number of options for funding the development, all of which are viable. In relation to the demand forecasts, as explained in Section 6 of the **Need Case [AS-125]**, the demand forecasts have been prepared taking into account prospective growth at other airports and the forecasts are fully consistent with the Government's Jet Zero Strategy (Ref 1).
The Harpenden Society RR-1506	Noise & Vibration	Specifically: On noise, Luton Rising is essentially proposing that noise levels remain fairly consistent with noise levels that exceeded the extant planning consent limits in 2019, despite the fact the planning consent limits are scheduled to fall substantially until 2028 under the existing planning permission (and under the 19mppa planning application subject to call-in by two Secretary's of State), thus the noise proposals fail to meet either the government's policy aims of minimising and reducing noise levels or sharing the benefits of (noise reduction) technology between the aviation industry and communities affected by noise.	The Applicant has undertaken an assessment of likely significant effects in Environmental Impact Assessment (EIA) terms by comparing the situation with the proposed development (the Do-Something scenario) to the situation without the Proposed Development (the Do-Minimum scenario) in each assessment year. The future Do-Minimum air noise baseline scenarios are compliant with the airport's current consented long-term noise limits that are applicable from 2028. For aircraft air and ground noise the assessment also compares the Do-Something scenario in each year to the 2019 Actuals baseline (or the 2019 Consented baseline in the sensitivity test). This comparison is to demonstrate how noise impacts will reduce

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			over time, in line with the government policy objective to limit, and where possible reduce, the total adverse impacts on health and quality of life from aviation noise. The Airports National Policy Statement (ANPS, Ref 24) provides clarity that this objective should be tested in relation to a historic baseline: "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." (paragraph 5.58) The Applicant considers that the Proposed Development is fully compliant with UK aviation noise policy and emerging policy, as set out in the **Planning Statement [AS-122]**. In line with policy, the Noise Envelope includes a defined mechanism to share the noise reduction benefits of future technological improvements in aircraft between the airport and local communities (see **Green Controlled Growth Explanatory Note [APP-217]**).
The Harpenden Society	Surface Access	So far as congestion on the roads and railways are concerned, the key access	A **Transport Assessment [APP-203 to APP-206]** has been produced to support the

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RR-1506		roads, the M1 and A1 and local roads such as the A1081 and A515, are already subject to severe delay during the morning and evening peaks but the application's proposals for improving the road network are extremely limited (and makes assumptions about future motorway use may not be achieved given concern about smart motorways). On the railways, the story is similar, during the morning and evening peaks Thameslink trains are overcrowded between Harpenden and St Pancras and there is little or no scope for increasing the frequency of trains (especially if the rail freight depot at Radlett opens).	application for development consent. This assessment has carefully and robustly assessed the forecasted impact and effects of surface access related travel to and from the airport and where relevant and necessary has proposed measures to mitigate against any significant impacts that are forecasted to occur. A **Framework Travel Plan (FTP) [AS-131]** has also been prepared, which sets out the structure and approach for Travel Plans (TPs) that will be produced in accordance with the requirements of the **Draft Development Consent Order (DCO) [AS-067]**, to deliver upon the vision and objectives for surface access as the airport expands. This will seek to maximise the opportunities for people to travel to and from the airport by non-car, sustainable means. Whilst the **Surface Access Strategy (SAS) [APP-228]** covers a 20-year period and guides the long-term growth of the airport, the TPs are the 'implementation' of this strategy. TPs will be produced every five years, with specific time-bound Targets for surface access during that shorter time period, supported by a

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			package of interventions and measures to achieve them.
The Harpenden Society RR-1506	Green Controlled Growth	We do not believe that Green Controlled Growth is an effective way of ensuring environmental conditions aren't breached. Luton Rising is the trading name for London Luton Airport Limited (LLAL). None of the directors, nor any of the senior employees assigned to the company (but actually employees of Luton Borough Council), have any aviation experience.	The development of the GCG Framework has included working closely with the existing airport operator, London Luton Airport Operations Limited (LLAOL), as well as engaging with relevant stakeholders, including (but not limited to) the Department for Transport, Civil Aviation Authority (CAA), airlines operating at Luton, as well as the International Air Transport Association (IATA) and Airport Coordination Limited (ACL). The purpose of this engagement was to develop an approach that can be practically implemented, comply with the relevant legislation and guidance relating to the management and operation of airports, (including the Slot Allocation Regulations 2006 and associated IATA international guidance), and that still meets the objectives of Luton Rising for managing environmental impacts. The proposed independent oversight and scrutiny body within GCG – the Environmental Scrutiny Group (ESG) – is proposed to include an independent aviation expert.

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			The **Draft ESG Terms of Reference [APP-219]** also currently propose a representative of an airline industry body. However, the Applicant is planning to amend this wording in a forthcoming amendment to the Terms of Reference to be more specific, instead proposing "a representative of a body involved in the publication of, or an individual with suitable knowledge, skills and experience related to the implementation of the Worldwide Airport Slot Guidelines (WASG), or any successor document to establish best practice for the allocation of airport slots." This is due to the need for the GCG Framework and decisions made as part of it to comply with existing legislation and guidance relating to the declaration of airport capacity and the slot allocation process, which are the intended mechanisms by which growth at the airport could be controlled if required. The amended wording will better safeguard the availability of the necessary expertise in this field for the ESG to draw upon. For clarity, Luton Rising is not proposed to be a member of the ESG, in recognition of the need for decisions to be made independently

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			of the airport owner (in addition to the operator).
The Harpenden Society RR-1506	Funding Statement	Furthermore, LLAL is financially challenged. It will not be able to undertake the development itself and will instead rely on the current concessionaire or another (post 2032). The current concessionaire, who pointedly is not the applicant, says it supports the application but this is subject to the "commercial arrangements" and the planning permission granted (if any). This is not a ringing endorsement of the proposals but more importantly it is clear that the commercial arrangements may be very different to the proposals being put forward by Luton Rising in support of its application.	Sections 4.2 and 4.3 of the **Funding Statement [APP-012]** explain potential approaches for financing Phase 1 and Phases 2a and 2b. These remain the case, with the final financial agreements being settled based on market conditions at the relevant times.
The Harpenden Society RR-1506	Planning	The uncertainty that is inherent in this application as a result of the inability of the applicant to make it happen and the reservations of the existing operator, subject to a future commercial agreement, suggest that the already highly speculative and cherry-picked benefits of the proposal are unlikely to materialise and the past willingness of Luton Borough Council (LLAL's owner) to allow persistent breaches of existing planning conditions emphasise that the environmental costs	The Planning Balance within the **Planning Statement [APP-194]** sets out the implications of the Proposed Development and weighs the benefits of the proposals against its disbenefits. The **Green Controlled Growth Framework [APP-218],** which will place controls on four key categories of environmental effect: air quality, greenhouse gas emissions, aircraft noise, and surface access, will be secured

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		will, in contrast, be felt fully, probably to a greater extent than those proposed and earlier than the phasing suggests will be the case (we note that the phasing is only for assessment purposes only which means there's no certainty as to the timing of any development and communities will be faced with uncertainty for years to come). We believe the application should be declined. We will submit evidence to support our concerns by the appropriate deadlines set by the Examining Authority.	through the Development Consent Order (DCO). As part of GCG there will be a new independent body called the Environmental Scrutiny Group (ESG) to oversee GCG and make sure that it works in practice. If monitoring were to indicate at any point that a Limit was in danger of being breached, then plans must be produced by the airport operator to set out how that breach will be avoided, for approval by the ESG. If any one of the environmental Limits were breached (unless for reasons outside the airport operator's control), further growth will be stopped, mitigation will need to be implemented if required, and ultimately, airport capacity would be constrained until environmental performance returned below the Limits. The values associated with the GCG Limits are aligned with the assumptions/forecasts for the respective environmental topics within the ES, which are based on an assessment of a reasonable 'worst-case' scenario. Were growth at the airport to occur faster than this assessed scenario, it could only take place if the resultant environmental effects were no worse than those associated with the forecast

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			rate of growth. GCG would therefore prevent the stated scenario from ever occurring. In summary, GCG provides far greater control on environmental impacts compared to the existing planning controls.

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Stop Low Flights from Luton RR-1448	Noise and vibration	There has previously been a lack of enforcement of planning conditions. Independent noise monitoring and effective control is now vital.	The Green Controlled Growth Framework **[APP-218]** defines a Noise Envelope for the proposed expansion including preventative processes using a Threshold to avoid Limits being exceed and oversight by the Environmental Scrutiny Group and a Noise Technical Panel. The Framework is supported by a number of appendices, including Terms of Reference for the proposed Environmental Scrutiny Group (ESG) **[APP-219]** and Technical Panels **[APP-220]** as well as by Monitoring Plans for each of the environmental topics in scope **[APP-221, APP-222, APP-223 and APP-224].**
Stop Low Flights from Luton RR-1448	Noise Envelope	There was only very limited chance for the general public to provide commentary and views during the previous Noise Envelope Design process. The overall process is so complex with such a heavy weight of material so as to make it impenetrable for anyone other than those with highly expert and extensively resourced teams with substantial financial resources.	**Appendix 16.2 Operational Noise management (Explanatory Note) of the ES [APP-111]** sets out how the Noise Envelope was designed in line with policy and guidance, informed by the Noise Envelope Design Group and was included in public consultation. The Noise Envelope Design Group membership included public representation from community groups Luton and District Association for Control of Aircraft Noise and London Luton Airport Town and Village Community Committee (now disbanded). As part of the NEDG terms of reference, this representation was on behalf of all community groups. The

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			NEDG worked with the LADACAN representative to enable draft proposals to be shared and commented on by other established community groups.
Stop Low Flights from Luton RR-1448	Community benefits	Luton Airport took the benefits of accelerated growth between 2014 and 2019. These benefits were not shared with local communities, particularly those in the South Harpenden area which have suffered very significantly from the airport's growth.	It is not true that the Harpenden area does not benefit from the operation of the Airport. As shown in Appendices 4 and 5 of **Appendix 11.1 to the Environmental Statement [APP-079]**, the airport provided employment for around 600 people in the St Albans District in 2019, with supply chain activities contributing around £9 million to GDP.
Stop Low Flights from Luton RR-1448	General	Luton Rising, as a well capitalised PR function, made unilateral changes and inappropriately marketed the supposed benefits from the expansion of Luton Airport.	The DCO application provides evidence and balanced information on the proposed development, which meets the requirements of relevant legislation, policy and guidance.
Stop Low Flights from Luton RR-1448	Noise Envelope	The Noise Envelope Design process has now been in operation for three years. It is extremely important that the effectiveness of this process is reviewed, with community stakeholder input.	As part of the Green Controlled Growth (GCG) Framework, it is recognised that there must be a role for local communities to input into the GCG process, as it is the local communities who experience the greatest environmental effects associated with the airport. GCG and the Noise Envelope has been designed so that community views are taken into account. See Section 2.5 of the **GCG Framework Explanatory Note [APP-217]** for further

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			information. The Explanatory Note also sets out, from paragraph 2.2.48 onwards, how the GCG process should be reviewed periodically by the airport operator.
Stop Low Flights from Luton RR-1448	Noise Envelope	One way of testing the NED is to revisit whether it would have prevented Luton Airport's consistent and flagrant noise breaches between 2017 and 2019.	**Appendix 16.2 Operational Noise management (Explanatory Note) of the ES [APP-111]** sets out how the proposed Noise Envelope contains mechanisms that should have avoided the noise Limit breaches that occurred at the airport from 2017-2019. This is further elaborated on in the **Comparison of consented and proposed operational noise controls document [APP-5.12]** which provides a direct comparison between the current and proposed operational noise controls, noting that the Noise Envelope provides several enhancements to the current consented noise controls, such as independent scrutiny and oversight, increased transparency, adaptive mitigation and management plans and noise limit reviews.
Stop Low Flights from Luton RR-1448	Noise and vibration	Previous errors in noise monitoring and modelling mean that an improved standard of monitoring / modelling is now required.	The noise model that has been used to set the Noise Envelope limits and that shall be adopted for the purposes of monitoring and modelling compliance with the Noise Envelope has been extensively validated using radar track data and noise measurements,

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			exceeding the requirements for noise model validation set by the Civil Aviation Authority (Ref 11). See Section 6 of **Appendix 16.1 of the Environmental Statement [AS-096]** for full details of the aircraft noise validation. The Applicant considers this to a robust approach.
Stop Low Flights from Luton RR-1448	Noise and vibration	The noise from aircraft departures for communities outside the defined contours continues to be horrendous. One, well understood, factor here is that departing aircraft are deliberately held low due to the hugely overcrowded airspace. Luton Rising, which has evidence from the NED to this effect has, however, conveniently and unilaterally chosen to de-emphasise, if not effectively ignore, the extent of this issue.	As set out in the **Environmental Statement Chapter 16 Noise and Vibration [AS-080]** the noise assessment of the Proposed Development has been undertaken based on current operational procedures, including the fact that aircraft are held down currently to avoid conflicts with flightpaths to and from other airports. This is to ensure that the assessment represents a reasonable worst case as it is expected that the future modernisation of airspace across the South East of England will lead to a deconfliction of some or all of these flightpaths enabling aircraft to climb more freely, so reducing the noise impact in future. As the effect of these future changes is not known, it was considered appropriate to assess the effects on a conservative basis, i.e. without accounting for any potential improvement. Changes to airspace and flightpaths are therefore outside the scope of the Proposed Development. Any changes to future flight

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			paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course.
Stop Luton Airport Expansion RR-1448	General	As a volunteer I represent the group Stop Luton Airport Expansion (SLAE) and as the name suggests the group are opposed to the airport's DCO application for expansion. For clarity, we are not opposed to the airport operating at up to 18 million passengers and we do not oppose the airport 'as it currently is' but we oppose any expansion that takes away the current Wigmore Valley Park footprint. Our group was founded to save the park following a meeting when representatives from Luton Borough Council told members of our group that the park would not be built over for airport expansion. Two months later they then announced their expansion plans and that has created mistrust. We have attended the Century Park, the airport operator's passenger expansion to 19 million applications, the non-statutory and the two statutory consultations and throughout our message has been the same, no expansion.	The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport. As such, it has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the **GCG Explanatory Note [APP-217]** submitted as part of this application for development consent. Regarding environmental impacts associated with the Proposed Development, the Environmental Statement submitted with this application for development consent, provides

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			assessments of a wide range environmental effects, including benefits and disbenefits. It will be for the Planning Inspectorate to consider the balance between the costs and benefits of the Proposed Development in providing its recommendation to the Secretary of State, based on the evidence submitted with the application. The Applicant is fully aware importance of Wigmore Valley Park and the development of the design has minimised the area lost. The park has been extensively surveyed and characterised regarding its biodiversity as reported in **Appendix 8.1 Ecology Baseline Report [AS-033 and AS-034]**. The Proposed Development includes replacement open space of 10% greater area, and at least equal quality and greater accessibility and accords with applicable policy. In addition to biodiversity provision in the replacement open space, extensive habitat creation is provided to achieve at least 10% biodiversity new gain. Both open space and habitat will be placed in trust and managed as described in the **Outline Landscape and Biodiversity Management Plan [AS-029]**.

Interested Party and Examination Library Reference	Topic	Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response
Stop Luton Airport Expansion RR-1448	General	Although the applicant and Luton Borough Council (LBC) define a boundary between their Ltd company and Council, we do not believe this is clear cut. If it was, then Luton Rising (LR) would not be made up of council employees and the directors would not be councillors. The majority of the Luton Rising Directors are part of the Labour political party which has been the ruling party in Luton since 2007. Historically Labour have not had an elected Councillor representing the Wigmore Ward, which is the closest ward to the airport and so the party clearly do not represent Wigmore resident views. In January 2019 two Liberal Democrat councillors resigned their seats on the board of Luton Rising as they were not allowed to publicly disagree with and criticise the decisions with which they had a sincere and serious concern on, unless the Labour members of the board agree that they may do so. In March of this year, Anne Donelan (Labour Councillor) was not selected to represent Labour in Luton's Northwell ward and in her resignation letter from the Labour party she wrote, "Due to the incompetence and failure to follow rules and procedures which I observed on the planning	The separation between The Applicant and Luton Borough Council is set out in **Role and Responsibilities of Luton Borough Council [TR020001/APP/8.29]**. The make-up of the Board of Directors reflects the majority position of the make-up of the Council with places available for representatives of each of the three main political parties forming Luton Borough Council. A place on the Board of Directors is designated for the Liberal Democrat Group in the expectation that it would be filled by a Councillor representing Wigmore Ward. Regarding the incident in January 2019, the facts are that the two Liberal Democrat directors of the company disclosed a conflict of interests between the company and those of the residents of Wigmore Ward. There is an established procedure within the Companies Act 2006 whereby a Board of Directors can authorise a conflict of interests. Had they chosen to follow the process and had the authorisation been forthcoming, the directors would have been able to make their views known without affecting their fiduciary duty to the company. However, they decided that a

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		committee." In August 2021 Luton Rising directors were invited by Friends of Wigmore Park (FOWP) / SLAE to visit Wigmore Valley Park to show what the impact of expansion would do to the park. One councillor did not know that the park existed whilst two others were not sure where the park was or how to get there without using SAT NAV. Of the current LR board, no Luton Councillor lives within the wards most closely impacted by the expansion. This asks the question as to whether if they are fit and proper to act as directors and as councillors and why are they making decisions that impact the Wigmore ward.	more appropriate course of action was to resign.
Stop Luton Airport Expansion RR-1448	Noise and Vibration	During the coming DCO examination, SLAE asks that all those involved from Luton Rising, the applicants consultants and the councillors of Luton Borough Council who think it such a acceptable idea to expand the airport to live under the flight path in the ward of South Luton in un-insulated accommodation for the six month period. They will be able to 'walk the walk' and also truly experience the up to 18 million passenger experience and get a taste for what it will be like if the airport reaches 32	The project team has spent considerable time in Luton and surrounding area to gain an understanding of how these areas are affected by aircraft noise and would be affected by the expansion proposals. The proposed insulation scheme provides a means for properties to be fitted with ventilation so windows can be kept closed to protect against noise. Refer to **Draft Compensation Policies Measures and Community First [AS-128]** for more

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		million. This is an ideal time as the summer season is upon us and local climate change temperatures mean that they would also want to open their house windows.	information on the noise insulation eligibility criteria.
Stop Luton Airport Expansion RR-1448	General	SLAE also asks that the majority councillor directorship of Luton Rising consist of councillors living within the adjoining wards closest to the airport. A good understanding of the issues directly associated to those living closest to the airport is paramount for councillors who sit on the Luton Rising board to truly understand the Wigmore Ward airport experience. Councillors living in the other Luton wards actually believe the economic solution to all their woes will be resolved by airport economic and job growth and push the debt out of sight.	This does not appear to be a matter for this application for development consent. Nevertheless, a place on the Board of Directors is designated for the Liberal Democrat Group in the expectation that it would be filled by a Councillor representing Wigmore Ward.
Stop Luton Airport Expansion RR-1448	General	Recently we wrote to the interim Luton Rising CEO asking for £65 million (the rumoured amount of funds set aside by Luton Council for the DCO application), to help us provide a balanced view of the airport expansion application. We felt it just, fair and appropriate to ask for equal funding to form a compelling case to counter application expansion and we could also fund competent experts to evidence why. Currently SLAE has around £700 in its	There have been multiple rounds of consultation on the proposals, and the respondent has provided feedback on each occasion. After each round of consultation, the Applicant has made changes to its proposals having given due consideration to all feedback received. It would be inappropriate for Luton Rising, or any other promoter of any form of planning

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		account and we pay a £5.00 monthly subscription. We feel that the council should treat the airport and residents equally. Our request was turned down.	application, to directly fund those objecting to its proposals. It is the role of the Examining Authority to test the robustness of the proposals, taking on board comments made by Interested Parties throughout the process. The Examining Authority, having heard and considered all sides of the debate will conclude whether or not the expected benefits of the proposals outweigh the expected disbenefits and recommend to the Secretary of State whether or not the application should be approved. The process is in place to ensure that all parties have a voice which is heard, regardless of the resources available to them, financial or otherwise.
Stop Luton Airport Expansion RR-1448	General	Recently there has been the National Mental Health week and we feel that it is important to make provision for caring and welfare during the examination. SLAE would like to check with the Planning Inspectorate that the health and well being of all those involved (Applicants, Consultants, Planning Inspectorate and all 'Interested Parties') will be of prime consideration throughout the examination process. Can the Planning Inspectorate advise on what they would	The examination process is led by the Examining Authority and managed by the Planning Inspectorate.

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		expect in reasonable hours for all of those involved to be? The wellbeing is of a concern as we know that there will be many people working outside of examination hours. There will be those paid, those unpaid, those working and those whose employers will not pay them wages or take kindly to any requests for holiday, or time off to attend the examination who will need to work late into the evening and early hours to catch up and respond, as well as perform their normal day jobs. In fact those living under the flight paths have more reason than those not to request this. Perhaps even a house swap is viable during the examination with those putting the case for airport expansion. It is suggested that health provision is made available and funded by the applicant.	
Stop Luton Airport Expansion RR-1448	Community First	Reading the letters of support for the application SLAE are not sure that the difference between the current 18 million and proposed 32 million is clearly understood. Most of the letters of support identify the current financial benefits received. SLAE suggest that if 'Green Control Growth' (GCG) is going to be passed into into law, then so can a similar	The application for development consent includes the creation of a new fund, Community First, within the **Draft Compensation Policies, Measures and Community First [AS-128]** document. This document provides detail about how the Community First fund will increase the level of funding provided by the Applicant to local communities.

Interested Party and Examination Library Reference	Topic	Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response
		law be put in place to protect charitable financial benefits. SLAE are concerned that if DCO approval is given that financial benefits may change and are surprised that protection is not included in the DCO application in detail. Are these supporters aware of the origins of where the funding comes from and if any of the organisations providing this funding to them are in debt? SLAE cannot understand why airport donations to charities has gone down over the past few years and the council continues to cuts support to services which pushes more people to ask for charitable help.	Community First commits to investing up to £14m per year in local communities. Community First, which is directly linked to growth, provides the security sought by the Stop Luton Airport Expansion to protect Community Investment. The Applicant has a long and proud history of providing significant funds to the local charity and voluntary sectors, providing circa £180M since 2002 and is committed to continuing this work, which is outside of the scope of this application for development consent. Indeed, Community First is additional to the Applicant's ongoing commitments. The Covid-19 pandemic had a devastating effect on the Applicant's income yet still throughout that time the Applicant continued to protect its investment in local good causes, naturally at a level slightly lower than had been the case in recent history, due to massively reduced revenue, though the proportionate decrease in charitable giving was significantly less than the total decrease in revenue, reflecting the commitment of the organisation to providing social benefit.

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			Notwithstanding this, The Applicant remains a private company and must operate within the laws governing such organisations, it would not therefore be appropriate to seek to make legally binding obligations beyond the scope of the growth being sought through this application to making minimum annual charitable contributions.
Stop Luton Airport Expansion RR-1448	General	We ask if there will there be a report published with high level statistics on the numbers that have registered as an 'Interested Party', if they are in favour or not, the locations that they have registered from and general subject reasons?	This document **'The Applicant's Response to Relevant Representations' [TR020001/APP/8.33]** summarises the representations made by all those who have registered as an Interested Party. The respondent is also able to read all 1603 relevant representations which are available on the Luton Expansion project page of the Planning Inspectorate's website.
Stop Luton Airport Expansion RR-1448	General	Moving onto the application, we note that at this stage you ask for comments and what we consider to be the main issues and impacts including anything that may affect our day-to-day lives. We have concerns that the application documentation is a long and difficult read by the majority population of Luton and this could put people off of	The Application comprises a large number of documents, organised within seven volumes. The purpose and contents of these seven volumes are described in the **Introduction to the Application [AS-002]**, with an accompanying **Application Document Tracker [AS-138]** listing each document and its Examination Library Reference Number.

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		registering. This is particularly so, as the applicant has documented that educational attainment is generally lower across Luton. We would also expect the applicant to name the audiences that the application is aimed at and expected educational attainment required to contribute. There are many repeated paragraphs in the application documents, paragraphs written that are impossible to understand without a clearer explanation. These documents are public documents and as such should all be created for and easily readable by the Luton public. There are also contradictions, incomplete sentences due to redactions and we ask how can a Luton resident be expected to understand technical jargon that is second nature to paid expert consultants?	The Application documents were prepared in accordance with relevant requirements and guidance. Some draft documents were also shared with technical stakeholders, including local authorities and statutory undertakers, prior to submission in order to improve their accuracy and readability. A balance was sought in providing the necessary technical detail whilst also ensuring documents were written in a non-technical style and in plain English.
Stop Luton Airport Expansion RR-1448	General	A lack of consistency is a general theme, with some documents having glossaries, others not, acronyms missing, some with references at the bottom, some throughout the documents and some a mixture. There are dated references over a decade old (discounting Government policy or laws). A resident should not need to sign up to websites and be expected to leave personal details when accessing a reference. There	As the respondent has acknowledged in the preceding comment the application submitted by the Applicant is, necessarily long and detailed for the reasons the Applicant explains above. As such, despite the best endeavours of the Applicant it is accepted by the Applicant that there will be errors in the application. Errors in Application documents that have been identified by the Applicant or brought to

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		are even documents with the text "Error! Reference source not found". Documents obviously written in different styles, by different companies, some have competent experts listed and others don't. Does this mean those documents were not written by competent experts? Documents with no consistent titling depending on whether the source was written in Microsoft Word or other applications. Different formatting. Documents downloaded from the Planning Inspectorate then opening and showing different titles or different titles picked out from the file properties. No clear definition of what content is actual evidence or not. Some have a reference number with no reference found or not available when searching the reference material. It's a mess, and wastes time and suggests some of these documents were rushed. How come this has cost £60 odd million? I read all of the Statutory 2 documents and probably retained 1% memory of that reading. To recall the documentation from the SIFT exercise, all of the consultations, the DCO submission, the references and the Planning Inspectorate documents is	its attention by other parties are reported in **The Errata Report [TR020001/APP/8.25].** Additional submissions that have been permitted by the Examining Authority are also listed in the Application Library. The Examination period provides a further opportunity for Application documents to be considered and commented on.

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		probably beyond the educational attainment of a Luton resident.	
Stop Luton Airport Expansion RR-1448	Noise and Vibration	There are other missing sections that we would expect to see in a DCO application, perhaps they fall outside of Planning law, for example the Application quotes the National Planning Policy Framework (PPF) when it comes to home-based workers. There is no mention of home-based workers who work from home and suffer from the flight path noise interruptions. If you are a home worker with your own business then it would be difficult to be in a business that required conversation, listening and meetings. You would be exposed 24 hours each day. It could be this is covered in visits to homes by noise consultants determining insulation measures, though this subject is still not covered or recognised in the DCO application. With more people working from home than before Covid and unlikely to change, it's surprising that figures to demonstrate this are not shown. Working from home is now a key selling point in job ads when attracting applicants. Without adequate insulation from flight path noise an applicant would be hesitant to apply for a role with home working requirements and	The assessment of noise effects from the Proposed Development considers both residential and non-residential receptors (which includes noise sensitive commercial properties, i.e. offices), see Table 16.7 of **Chapter 16 of the Environmental Statement** (ES) **[AS-080]**. The assessment criteria for residential properties are lower than those for offices. This can be seen by comparing Tables 16.13, 16.14 and 16.19 of **Chapter 16 of the ES [AS-080]**. This is because health effects from noise can occur at or above the Lowest Observed Adverse Effect Level (LOAEL) which are lower noise levels than those that could disrupt listening, conversation or meetings in an office or home working environment. The assessment of residential households is therefore a worst-case and would not be affected by the assumption that there is an increased proportion of home working. As the comment notes, the noise insulation scheme will benefit the internal noise conditions of eligible properties, regardless of whether they are used for home working or not.

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		this could be seen as discrimination. It is evident that Desk-Based Assessments do not capture the ward knowledge that residents have and there are surprising omissions from the application. Those who live in the wards surrounding the airport know the issues and the times that they occur.	
Stop Luton Airport Expansion RR-1448	Planning	From my own reading two local road issues are not captured and the new park and playground have not been properly thought about. For example, let us look at Green Horizons Park, which was New Century Park, until it was decided that New Century Park was no longer viable. New Century Park planning permission was granted by Luton Borough Council and we now find in the DCO application its name has changed and also its footprint size. The amended footprint size means that Green Horizons Park could now be built on brown belt land to the South West of the airport. This would allow a greater area of Wigmore Valley park to be retained, and could even involve a redesign of the airport expansion to save the County Wildlife Site. Because the public were never consulted on the re naming and	Green Horizons Park is an extant planning permission which the Applicant is intending to implement. The detailed layout of Green Horizons Park will be subject to future Reserved Matters applications, to Luton Planning Authority, pursuant to the extant permission and there will be consultation with statutory consultees, local interest groups and the general public as part of that process.

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		re-sizing of Green Horizons Park, we were unable to suggest improvements.	
Stop Luton Airport Expansion RR-1448	General	Due to the time span taken to get to this stage of the DCO application SLAE think it perfectly reasonable for another SIFT exercise to be carried out. We suggest that the DCO should be split by phases and after implementation of each phase another DCO application is applied for. This gives the applicant time to re-assess, re cost the development and be able to adapt to new laws both nationally, European and worldwide, particularly in this changing world of climate change we live in. If we look at the number of major revision changes from Statutory consultation 1 and 2 and this DCO application then we could see the application improve after each phase, perhaps even realising that expansion is not a good thing and realising the need to save the park and County Wildlife Site. Although we have no evidence yet to submit on the topics of Brexit, Covid, Volcanic Ash events, current economic situation and inflation rises, worker strikes, local, national and International climate change, huge local council job losses, and the war in Ukraine. All have an impact on the aviation industry,	Air traffic can be volatile to short term events, such as Covid-19 or volcanic as events but this does not necessarily reflect people's underlying demand to travel, which generally relate to underlying economic conditions. Although there are short term economic challenges, the evidence is that air passenger demand has virtually recovered to pre-pandemic levels and would in future be expected to grow in line with underlying economic growth. The demand forecasts for the application for consent were prepared based on the Government's economic projections in 2022, which took into account the effects of Brexit, and sensitivity tests were carried out to ensure that consideration was given to economic uncertainties. To the extent that there are uncertainties in the precise timing of demand growth, this would not have altered the SIFT outcomes in terms of the option selected.

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		with the majority of those being unexpected and unplanned events. Aviation is very susceptible to unplanned and rapidly changing national and international events and with slow recovery periods it therefore makes sense to split the phases or have good back out options (not decided by Luton Rising or the Council's planning mechanism). In fact, in response to all of these unplanned events, Luton Rising's continuously delayed DCO submission has proven how susceptible aviation is and the need to re-visit the SIFT options.	The projections are considered robust over the life of the Proposed Development but the precise phasing by which the development will be implemented will depend on economic outturns.
Stop Luton Airport Expansion RR-1448	Need Case	SLAE are also surprised to find that there is minimal provision found in the DCO application of how aviation susceptibility would impact the aviation economics benefits and impact on jobs. Many supporters of the airport expansion quote job creation as a key selling point, yet job loss is not covered. SLAE would expect greater detail included with and without Government intervention scenarios. SLAE do not see good options provided in the application if the minor, moderate or major significant scenarios end up in practice to be opposite to those documented and the true mitigation solution. It is noted that the	Any uncertainties in the rate of aviation demand growth are reflected in the Faster and Slower Growth Cases set out in Section 6 of the **Need Case [AS-125]**. The implications of these Faster and Slower Growth Cases on the assessment of economic benefits are set out in **Appendix F to the Need Case [APP-214]**.

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		documentation set is heavily biased towards 'minor'.	
Stop Luton Airport Expansion RR-1448	Planning	SLAE understand that the Local Luton Plan is a legal document, however there are contradictions within and also the council seemly applies the plan when it wants to. All references to the Local Plan should be removed from the application. This raises the question over the word 'local' and what its true definition is in National Planning Law. Its use and meaning varies widely over what Luton Rising, Luton Borough Council, residents and groups such as ours want it to mean. For example a Ward resident may use the word 'local' to represent their Ward. LBC may use the word to mean the whole of the Borough and Luton Rising may use the word to mean all of the Bedfordshire and surrounding counties. Each referring to something different. A Wigmore ward resident would refute that by LBC using the word 'local' it also included Wigmore. SLAE ask that all references using the word 'local' be removed from the DCO application and all referenced material, or that the context of 'local' is explained and easily understandable in meaning.	Luton Borough Council is a host local authority for the Proposed Development as well as being the ultimate owner of London Luton Airport. The Applicant did consider the Local Plan to be an important and relevant consideration for the application for development consent and has provided a summary of how the Proposed Development complies with all relevant provisions in the **Planning Statement [AS-122]**. The Applicant does not have control over how the term 'local' is used by third parties but is of the view that it has defined clear and robust study areas for the purposes of the assessments submitted in support of the application. On this basis, the Applicant does not agree to removing the word 'local' from the application documents.

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Stop Luton Airport Expansion RR-1448	Wigmore Valley Park	Investment in, and upkeep of Wigmore Valley Park has been left by the council over the years to make the land more attractive to the expansion and park plans by Luton Rising. Let's look at the Pavilion and the children's play area. The plans in the DCO do not cover adequate provision for the Pavilion and children's play area. They read well and look exciting, but insufficient thought has gone into the planning of these, and any new plans look appealing when the council has deliberately ignored investment. This leads us to think that any local amenities offered to the residents will be cut back when it comes to local planning decisions made after the DCO application process has completed. The majority ruling political party of the Development Control Committee always passes airport plans, none are ever refused. Residents can see this committee cutting back on any Wigmore Valley Park amenities as a result of cut backs, economic benefits and jobs, as decisions always do.	The proposed park will provide an area of space that is at least as good in usefulness, attractiveness, quality, accessibility and at least 10% larger than the current provision. The Proposed Development makes available for public access land that is currently in use as farmland. The Replacement Open Space is at least 10% greater in size than that existing and further information can be found within **Chapter 8 Biodiversity** of the ES **[AS-027]**. Improvements to the northern part of the park including the children's play area will still be delivered as described and permitted by the Green Horizons Park planning permission. The Applicant recognises that Wigmore Valley Park is important to the public and is committed to providing open space for the public to enjoy that is more attractive and usable to a wider range of people than the current offer. The effect on Wigmore Valley Park as a community asset has been assessed and reported in **Chapter 13 Health and Community of the Environmental Statement, [AS-078]** concluding that with the

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			delivery of replacement open space in Phase 1 and after it's established there will be a minor beneficial effect. An **Open Space Assessment** is provide as **Appendix C [APP-197]** to the Planning Statement. The Applicant has committed to long term management of the open space and habitats for 50 yeas as described in the **Outline Landscape and Biodiversity Management Plan]AS-029]**, and funding this through establishing a community trust in perpetuity if Development Consent is granted. Measures for the establishment and long-term management of habitats is detailed within **Chapter 8 Biodiversity** of the ES **[AS-027]**.
Stop Luton Airport Expansion RR-1448	General	SLAE note that the 'Green Control Growth' (GCG) application documents express that GCG will be passed into law. SLAE's take is that if GCG can be passed into law, so can Wigmore Valley Park amenities and protection, and not a later stage. The council has committed to progressing deed of dedication arrangements with the 'Fields in	The Applicant can only implement the Proposed Development if the Secretary of State consents to the application If consent is received, the Applicant proposes to deliver the vast majority of proposed landscape mitigation at the start of construction, in order to allow it several years

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		Trust' charity with the ultimate aim of protecting all Luton parks and green open spaces from development. The current Wigmore Valley Park must be top of the list and before the DCO application is decided.	to establish before most increases in aircraft movements occur from construction of the new terminal, and further detail can be found within **Chapter 14 Landscape and Visual** of the **ES [AS-079]**. The loss and replacement of open space proposed by this application is subject to strict planning tests and is only proposed in this instance having exhausted other options. The Proposed Development has been carefully selected following a three stage Sift process which did consider options for Wigmore Valley Park. A scheme that sought to avoid Wigmore Valley Park in its entirety was developed and subsequently appraised at Sift 3 alongside the existing Sift 2 options. This option was however discounted as it proposed development in the Green Belt and outside of the Luton Local Plan LLP6 Strategic Allocation boundary. It was also judged to perform poorly against other criterion, notably on the basis of operations, noise impacts, land ownership and landscape and visual impact considerations. Details of the sifting process can be found in the **Design and Access Statement I [AS-049]**.

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			Details of the Replacement Open Space to be provided at Wigmore Valley Park can be found in Appendix C. An associated assessment of policy compliance is given in Section 13.9 of ES **Chapter 13 [AS-078].** Details of the sifting process can be found in the **Design and Access Statement Appendix B [APP-209, APP-210, APP-211, APP-212]**.
Stop Luton Airport Expansion RR-1448	Plans	Are the application maps consistent? It doesn't appear so. There are numerous references to the Lead Contractor, SLAE assume this will be Ryebridge and ask that the application documents are updated accordingly so that the Lead Contractor can complete all those statements left open and close the many holes where there is ambiguity and indecision.	If the respondent could advise on any specific inconsistencies, then these can be considered by the Applicant and amended if appropriate. The DCO application is seeking consent to allow the implementation of works. Selection of a Lead Contractor will follow a procurement process which will only be confirmed if consent is granted.
Stop Luton Airport Expansion RR-1448	General	And as evident, SLAE have challenges to nearly all of the subject material in almost all of the applicants documents which we are happy to explore during the examination. These include, Arboriculture, Adjoining Ward and Airport footprint Climate Change, Agricultural, Air Quality, Airport Access Road and Luton DART, Airport Boundary	The Applicant will continue to review and respond to matters raised through the examination.

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		Plan, Alternatives and Design Evolution, Approach to the Assessment, Archaeological, Biodiversity, Bird Strike, Book of Reference, Chilterns AONB, Compensation, Construction, Consultation, Contamination, Crown Land Plans, Cultural Heritage, Landscape, Drainage, Due Regard tables, Eaton Green Landfill, Ecological, Economics, Employment, Training, Electronic Application Index, EMS Orchid and Invertebrate, Energy, Equality, Flood, Funding, geophysical, Green Controlled Growth, Greenhouse Gases, Habitats, Health, Community, Highway, Hydrogeological, Land, Soil, Landscape and Visual, Lechate, Light Obtrusion, Location Plan, LVIA Methodology, Major Accidents and Disasters, Mitigation, Need Case, Noise, Nuisance, Open Space, Other Developments, Outline Site Waste Management Plan, Oxford Economics Reports, Risks, Scheme Layout Plans, Scoping Opinion, Sensitivity Tests, Site and Surroundings, Soils and Geology, Statement of Reasons, Streets, Rights of Way, Surface Access Strategy, Sustainability, The Proposed Development, Traffic and Transportation, Tree Survey, Validation	

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		Reports, Vibration, Visual Representations, Waste and Resources, Water, Winter and Summer Viewpoint and Work Plans.	
The Woodland Trust RR-1519	Biodiversity	The Woodland Trust strongly opposes the proposed scheme due to its direct impact on T343, an ancient ash tree that is set to be translocated for the project. We request that T343 is kept in its original location during construction and adequately protected according to the standing advice of Natural England and the Forestry Commission. This advice specifies that for ancient or veteran trees, the buffer zone should be at least 15 times larger than the tree's diameter, or should be five metres from the edge of the tree's canopy if that area is larger than when calculated to 15 times the diameter. This ensures a minimum root protection area. If other impacts are expected to extend beyond this distance, a larger buffer zone will be necessary.	Nine ancient and veteran trees and a small group of five ancient and veteran trees have been identified, along with Winch Hill Wood ancient woodland, and have been retained within the Main Application Site. These trees and woodland will be retained and have been incorporated into the landscape design for the provision of open space and habitat creation areas with the unavoidable exception of one, T343 – coppiced ash (see the Tree Survey Report **Appendix 14.2 [APP-089]** and the Arboricultural Impact Assessment **14.3 [AS-085] Section 3**), which lies directly within the main works but will be coppiced and translocated.
The Woodland Trust RR-1519	Biodiversity	We also have concerns about the potential impacts on several ancient woodlands, including Winchill Wood, due to changes in nitrogen deposition. Ancient woodland ecosystems and their soils hold significant importance due to their long history of ecological and cultural continuity. These	The air quality impact assessment of impacts on ancient woodland and designated sites has been undertaken in accordance with published guidance including that from Natural England and the Design Manual for Roads and Bridges (DMRB) volume LA105 and is reported in the

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		habitats are irreplaceable and highly sensitive to environmental changes. Therefore, any substantial increase in nitrogen levels would further degrade the ancient woodland habitat, compromising its ecological integrity and suitability for local wildlife populations. To address this issue, the applicants should aim to reduce the process contribution of nitrogen to less than one per cent for all surrounding ancient woodlands. This measure is essential to safeguard the health and viability of these valuable ecosystems.	air quality assessment (ES **Chapter 7 [APP-034]**). There is no current requirement in law or formal guidance to reduce the contribution of individual projects to nitrogen deposition to ancient woodland so that it falls below 1% of the critical load. Note that the '1% of the critical load' threshold is a 'screening threshold' denoting the need for further consideration, it is not a damage threshold. The assessment began with consideration of numerical exceedance thresholds such as whether the '1% of the critical load/level' initial screening threshold is exceeded and whether the DMRB 0.4 kgN/ha/yr threshold for effects on botanical species richness is exceeded. Specifically regarding Winch Hill Wood, it was possible to conclude no significant adverse effect in line with DMRB guidance because forecast nitrogen deposition due to the Proposed Development would not exceed 0.4 kgN/ha/yr. The assessment then also took account of the extent of the site that would be subject to nitrogen deposition due to the Proposed

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			Development , current nitrogen deposition exposure, and the limited role that further nitrogen deposition has when existing nitrogen deposition is already high, as reported in published research. Where appropriate, consideration was also given to the removal of land from agricultural production to create the Habitat Creation Area, given the large role in atmospheric nitrogen deposition played by livestock. Natural England has concurred with the **Habitat Regulations Assessment (HRA) Appendix 8.3 [APP-171]** which concludes no significant air quality effect on Chilterns Beechwoods SAC which is located within the National Trust Ashridge.
Wigmore Village Neighbourhood Area Forum RR-1586	Planning	North Hertfordshire District Council was told what the Rochdale envelope entailed exactly, during very detailed written and representations made during the examination of its local plan. They can be seen here: https://www.north-herts.gov.uk/sites/default/files/ED225 Carolyn Cottier response to Maps & Notes ED213A-E (5Jan2021).pdf ED225 5 Jan 2021 Ms Carolyn Cottier: Response to Maps and Notes on East of Luton from Bloor	This comment appears largely related to the examination of the Local Plan and does not relate specifically to the proposals subject to the DCO application. The **Planning Statement [AS-122]** presents a planning assessment of the Proposed Development against key themes. **Chapter 21 of the Environment Statement [AS-032]** reports the assessment of likely significant in-combination and cumulative effects of the

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		Homes & The Crown Estate (ED213A-E) (PDF, 21.340Kb). It contains an energy pipeline, and the DCO overlaps onto the North Herts proposed housing site EL1. There has been failure of NHDC and LBC to address the listed key strategic matters pertinent to boundary conflict/ overlap identified upon cross boundary Luton major development and EoL SHS. These are green belt, AONB, housing, infrastructure, air pollution, traffic and transportation, adjacent and overlapping national infrastructure projects. ED28 - 14 Nov 2017 - Final SoCG between Bloor Homes & Crown Estate EL1, EL2, EL3 Land East of Luton (2) redacted copy. Contained nothing about Airport Enterprise Zone, employment area, Airport, Century Park or New Century Park thereafter. ED81 – Feb 2018 – Supplementary Statement of Common Ground As Agreed Between North Hertfordshire District Council and Bloor Homes and the Crown Estate. Concerning Secondary education provision East of Luton. And the most recent attempt (2 December 2020) to provide a set of	Proposed Development and **Appendix 21.1 Long List of Other Developments [APP-140]** of the Environmental Statement details the developments considered. Housing allocation EL1 from the NHDC Local Plan was captured in this through planning applications 17/00830/1 and 16/02014/1.

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		common maps has shown conflict with even their own earlier maps from this ED81! Both ED81 and Mr Howell Williams's recent maps show nothing about Earthworks, Landfill, Airport Enterprise Zone, Employment Zone, Airport, Century Park or New Century Park. It was on page 11 of this document that the true purpose of the overlapping area can be seen. It is a secondary school, primary road, and roundabout – not mutually agreed landscaping between the two developments as both councils attempted to assert. The "landscaping and hedgerow" description doesn't even match the "Bloor Crown Master Plan" within their own SoCG. During the plan examination 300 consultation representations from East Of Luton and Breachwood Green were "lost" and remain allegedly lost by NHDC and the Planning Inspector/ate. We still require that these be located since they contain vital evidence and local stakeholder views regarding these two overlapping nationally	

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		significant infrastructure projects, as well as the consequential DCO.	

REFERENCES

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Ref 7 Ministry of Housing, Communities & Local Government (2021), National Planning Policy Framework
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Ref 10 Town and Country Planning Act 1990
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Ref 14 World Health Organisation (2018), Environmental Noise Guidelines for the European Region
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Ref 21 EUROCONTROL Experimental Centre, (2020); Air Noise Performance Database v2.3
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Ref 23 Department for Communities and Local Government (2019), Planning Practice Guidance: Noise
Ref 24 Department for Transport (2018). Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England