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London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)
**8.31 Applicant's Response to Relevant
Representations - Part 2E of 4 (Parish Councils)**

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

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8.31 APPLICANT’S RESPONSE TO RELVANT REPRESENTATIONS –

PART 2E OF 4 (PARISH COUNCILS)

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3.5 Parish Councils

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Interested Party and Examination Library Reference	Topic	Matters Raised in relevant Representation (Verbatim)	Response
Kings Walden Parish Council (Prescribed Parish Council under s.42(a)) RR-0810	Noise	Kings Walden Parish Council objects to the plans to increase annual passenger numbers from 18m to 32m. If approved they will have a significant effect on the quality of life in the parish: - 70% more flights, and therefore more noise, particularly at night. An increase in noise pollution will affect the parish detrimentally. The parish is already hugely affected by noise pollution from the airport. - growth in air and light pollution and other environmental concerns including the loss of farmland. - more traffic using local rat runs - major earthmoving project to absorb Wigmore Park and surrounding land into a significantly expanded airport will affect the residents of the parish.	<p>The impact of noise (day and night) 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 Environmental Statement (ES).</p> <p>The Transport Related Monitoring and Mitigation Approach (TRIMMA) will be used as a means of monitoring airport-related traffic on the local highway network. The results from this, which will be reported on in due course, will be based upon a framework set out by the Outline TRIMMA (refer to Appendix I Transport Assessment [APP-202]).</p>

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			<p>The Applicant is willing to enter into discussions with local authorities (the organisations responsible for the maintenance of the highway network) with regard to mitigation schemes in their local residential areas where there is a clear demonstration that there are problems related to airport related traffic.</p> <p>The ES includes robust assessment of effects on Chapter 7 Air Quality [AS-076], Appendix 5.2 Light Obtrusion Assessment Part A [APP-052], Appendix 5.2 Light Obtrusion Part B [APP-053], Chapter 6 Agricultural Land Quality and Farm Holdings [APP-033] of the ES, and other environmental aspects, including consideration of Wigmore Valley Park as agreed with stakeholder through the Environmental Impact Assessment (EIA) Scoping process.</p>

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Slip End Parish Council (Prescribed Parish Council under s.42(a)) RR-1408	Noise	1. To: The Planning Inspectorate Ref: Luton Airport 20th June 2023 Slip End Parish Council (SEPC), a prescribed consultee in terms of this consultation, strongly opposes the plans of London Luton Airport Operations Limited (LLAOL) to expand London Luton Airport, both the short term raising of the passenger cap to 19 MPPA and the long term plans for a second terminal with an increase of passenger numbers to 32 MPPA. In summary our objections (in a far from comprehensive list) include, in no particular order: *Excessive noise (the parish lies less than 3000 feet below both landing and takeoff flight paths). *Inadequate noise monitoring.	<p>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 Environmental Statement (ES).</p> <p>The Applicant has undertaken a robust validation exercise of the aircraft noise model using radar track data and noise monitoring terminal measurements. Refer to Appendix 16.1 Noise and Vibration Information [AS-096] of the ES for further information.</p>
Slip End Parish Council (Prescribed Parish Council under s.42(a)) RR-1408	Air Quality	2. *An absence of environmental monitoring to the west of the airport. *A limited range of environmental contaminants being monitored.	The Applicant has undertaken a baseline diffusion tube monitoring survey to supplement the existing monitoring data at locations where there are gaps in the local authority monitoring around the airport, and at locations which could be used to support model verification. Monitoring was carried out following best practice

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			guidance and included monitoring to the west of the airport. The diffusion tube survey measures NO ₂ as the key pollutant of concern and volatile organic compounds (VOCs) which were requested by local authorities in response to consultation questions from the public.
Slip End Parish Council (Prescribed Parish Council under s.42(a)) RR-1408	Need Case	3. *Concern over the opaque relationship between LLAOL and Luton Borough Council. *Manipulation of air traffic and passenger data sets to raise the 'baseline' from 2017 to 2019, to create an inflated 'normal' year.	<p>The Applicant has submitted a document at Deadline 1 setting out the roles and responsibilities of Luton Borough Council (LBC) [TR020001/APP/8.29]. This submission is in response to a request by the Examining Authority (ExA) under section 13 of Annex F of the Rule 6 letter. The submission explains the relationship between LBC, Luton Rising and the airport operator, LLAOL.</p> <p>The data used for the baseline reflects the actual traffic handled by the Airport in 2019 and has not been manipulated. The basis for this data is clearly set out in section 5 of the Need Case [AS-125]. This forms a robust basis for the</p>

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			<p>assessment of future forecast passenger demand.</p> <p>A baseline year of 2019 was selected for the noise assessment. This year represents the last year of normal activity at the airport pre-Covid pandemic. Although it is acknowledged that, in 2019, existing noise contour limits were exceeded for both day and night periods, the use of 2019 as a baseline is to identify if there will be any changes to health and quality of life from the last year of typical operating conditions.</p> <p>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 [AS-080] of the Environmental Statement (ES).</p> <p>An assessment against both the 2019 Actuals and 2019 Consented baseline</p>

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			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.
Slip End Parish Council (Prescribed Parish Council under s.42(a)) RR-1408	Noise	4. The failure of LLAOL to comply with operating targets on night flights and aircraft noise. *A refusal of LLAOL to discuss with the public their plans for the expanded use of wide-body jets on mid-haul routes, with concomitant noise increase.	<p>Issues relating to the operation of the airport should be addressed to London Luton Airport Operations Limited (LLAOL) as the airport operator, rather than the Applicant.</p> <p>With regards those issues relating specifically to noise, reference should be made to the 'Noise Envelope' (as identified in the Green Controlled Growth Explanatory Note [APP-217]). This has been designed to improve upon the existing noise control regime and to prevent breaches from occurring.</p> <p>Appendix 16.2 Operational Noise Management (Explanatory Note) [APP-111] of the Environmental Statement (ES) sets out how the</p>

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			<p>proposed Noise Envelope contains mechanisms that would have avoided the noise limit breaches that occurred at the airport from 2017-2019.</p> <p>This is further elaborated on in the Comparison of consented and proposed operational noise controls document [AS-121]. This document 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.</p>
Slip End Parish Council (Prescribed Parish Council under s.42(a)) RR-1408	Traffic and Transport	5. *An increase in opportunist 'flyparking' in the village by the public using the airport.	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

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			<p>environmental effects which could undermine the ability of the Applicant to meet Green Controlled Growth (GCG) targets.</p> <p>The Transport Assessment [APP-203 to APP-206] and Surface Access Strategy [APP-228] set out the proposed monitoring and mitigation measures associated with future car parking provision. As part of the ongoing review process, the Applicant intends to produce monitoring programs, assess any impacts, and then intervene accordingly if any issues persist.</p> <p>The Applicant has provided support to local areas where there is a realistic opportunity for people to 'flypark' in local streets.</p> <p>The Applicant considers the likelihood of an increase of passengers and staff 'flyparking' remotely in villages and Parishes surrounding the airport as part of the Proposed Development very low. If such instances do occur,</p>

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			the Applicant would welcome discussions through the Airport Transport Forum to raise these issues and discuss potential solutions.
Slip End Parish Council (Prescribed Parish Council under s.42(a)) RR-1408	Affordability	6. *Concern over the economic case for the airport, in particular the costs of cleaning up emissions in the face of rising carbon values. All of these concerns are explored in greater depth in our correspondence with LLAOL arising from the series of consultations, notably our letters of 9/12/2019, 12/2/2021 and 22/3/2022. We attach here a copy of the March 2022 letter as we have not had an acknowledgement of receipt for it and it is a fundamental statement of the position of the parish. Apologies if you already have it in your documentation. As we note at the end of that letter– the expansion of the airport brings no benefits to the residents of Slip End; and suggest the impact on of the quality of their lives will be considerable. We wholeheartedly oppose the plans put forward.	Table 8.8 of the Need Case [AS-125] sets out the results of a socio-economic benefits analysis that demonstrates wider benefits to society even after taking the costs of carbon into account. The costs to the airlines of offsetting or abating carbon are fully accounted for in the demand forecasts as explained in section 6 of the Need Case [AS-125] . It is noted that the letter from 22 nd March 2022 was not included as part of Slip End Parish Councils' representation. The Applicant only received letters from 9 th December 2019 and 12 th February 2021.

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Cholesbury-cum-St Leonards Parish Council RR-0229	Noise	Cholesbury-cum-St Leonards Parish is currently affected by noise from aircraft using the Compton SID. This is especially true when many flights deviate to the south of the prescribed track over higher ground. There are also frequent low level flights arriving to make an easterly approach. Allowing flights to increase from 18 million to passengers 32 million passengers pa will exacerbate the noise intrusion - especially at night. We are also concerned that the prospect of future changes to the flight paths could be highly adverse to our community. We are mindful that proposed alterations to flight paths made in 2010 would have been disastrous for our communal well being.	<p>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 Environmental Statement (ES).</p> <p>Any changes to future flight 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.</p>
St. Paul's Walden Parish Council RR-1417	General	The Parish Council is interested in both the positive and negative aspects of the expansion of the airport. It wishes to represent all the residents of the parish in any comments it makes about the expansion plans.	Noted.

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Buckinghamshire and Milton Keynes Association of Local Councils RR-0165	Noise	1. Inadequate noise controls: The applicant has not complied with Government policy re tailoring the Noise Envelope to local priorities and designing it in meaningful consultation with local communities. It is not discussed how future benefits will be shared or that communities will be meaningfully consulted post DCO. The noise thresholds cited in Table 3.1 of 7.08 Green Controlled Growth Framework are at once misleading and meaningless: for 95% read 99%. Night flight restrictions are inadequate and mean some villages plagued by night noise miss out on insulation.	<p>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.</p> <p>Appendix 16.2 Operational Noise Management Explanatory Note [APP-111] of the Environmental Statement (ES) sets out how the Noise Envelope proposals comply with UK Government policy, including details of how the Noise Envelope has been developed in consultation with local stakeholders and local communities through the Noise Envelope Design Group.</p> <p>The Noise Envelope is a legally binding framework to monitor, manage and control aircraft noise, including 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-</p>

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			<p>217]). This would be controlled through a requirement to review the Limits and Thresholds in 5-yearly cycles and reduce these, if reasonably practicable, as and when future technology becomes available, and its noise performance is known.</p> <p>The airport operator would fund the organisation of the community engagement meetings for each environmental topic within the Green Controlled Growth (GCG) Framework, including noise.</p> <p>The Noise Envelope 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 would be secured through Requirement 27 of the Draft Development Consent Order [AS-005].</p>

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Buckinghamshire and Milton Keynes Association of Local Councils RR-0165	Climate Change	<p>2. Misleading promises re greenhouse gas emissions: Reliance on SAF to control greenhouse gas emissions is flawed. At least as much CO₂ is emitted when all SAF is burned as from kerosene; any net life-cycle emissions' savings come from a) the assumption that CO₂ has previously been removed from the atmosphere; b) the assumption that 'waste' raw material would have otherwise gone to landfill and released CO₂ and methane; c) assumptions as to what else might have happened to the waste, and also to the land where plants-for-fuel are grown. The Royal Society concludes that "Life Cycle Analysis tools can be very flexible in how they are applied, which would significantly produce different results depending on how the boundaries are set."</p>	<p>The Applicant acknowledges that tailpipe emissions of CO₂ occur when Sustainable Aviation Fuel (SAF) is combusted in aircraft engines; the overall emissions reduction, relative to mineral kerosene, is then achieved through the use of raw materials that are already part of the carbon cycle, i.e. that they are ultimately derived from plants that have taken carbon dioxide out of the atmosphere as they grew. It is further recognised that the scope and boundaries of any Greenhouse Gas (GHG) assessment would inevitably have a bearing on the overall results.</p> <p>For the purposes of the GHG assessment presented in Chapter 12 Greenhouse Gases [APP-038] of the Environmental Statement (ES), the assumption of the overall emissions reduction from the use of SAFs is taken directly from the Jet Zero illustrative scenarios and sensitivities published by the UK Government to accompany the Jet Zero Strategy.</p>

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			<p>Paragraph B.5 of this document states that:</p> <p><i>“In the illustrative scenarios presented in this document we present the emission savings delivered by SAF as a percentage of kerosene emissions in line with the assumed life cycle emission savings relative to kerosene underpinning the ‘Mandating the use of sustainable fuels’ consultation’. The assumptions vary through time and by uptake scenario, in the range 67 -75% emissions savings relative to kerosene.”</i></p> <p>The GHG assessment presented in Chapter 12 Greenhouse Gases [APP-038] of the ES applies the 67% emissions reduction figure relative to the use of kerosene, i.e. the most cautious end of the range supplied by the UK Government. The Applicant takes the view that this is a reasonable assumption to adopt for the use of SAFs, and recognises that there would be residual net emissions to the atmosphere of 33% those of kerosene.</p>

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Buckinghamshire and Milton Keynes Association of Local Councils RR-0165	Biodiversity	<p>3. Unacceptable loss of farmland and biodiversity: Approximately half of the agricultural land to be built on is classified as “Best and Most Versatile”. More land would be lost to provide new areas of habitat creation to mitigate biodiversity losses elsewhere. However, this would not be like-for-like habitat replacement so, as well as losing the agricultural land itself, the biodiversity associated with open farmland (e.g. hare, deer, fieldfare, skylarks, lapwings) would also be lost. Damage to the Winch Hill Wood ancient woodland owing to habitat fragmentation and reduction in ecological connectivity cannot be avoided. There are numerous “minor adverse effects” of the proposed development, individually classed as “not significant”, yet the cumulative effects and significance have not been discussed.</p>	<p>As detailed within Chapter 8 Biodiversity [AS-027] of the Environmental Statement (ES) and Appendix 8.5 Biodiversity Net Gain Report [APP-067] of the ES, the habitat creation adequately mitigates the loss of farmland and provides enhanced habitat which is more biodiverse for species, including those currently within this farmland.</p> <p>In paragraph 8.98 of Chapter 8 Biodiversity [AS-027] of the ES, an assessment of the fragmentation of Winch Hill Wood is undertaken. This states that there is a minor adverse effect, which is not significant in the short-term decreasing to a negligible effect when vegetation reaches maturity in the long term, which is not significant.</p> <p>Chapter 6 Agricultural Land Quality and Farm Holdings [APP-033] of the ES includes consideration of effects on agricultural land classifications.</p>

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			The assessment of likely significant in-combination and cumulative effects of the Proposed Development is detailed within Chapter 21 In-combination and Cumulative Effects [AS-032] of the ES.
Harpenden Town Council RR-0529	General	The Town Council has previously resolved that these plans are completely inappropriate. Harpenden is already negatively impacted by Luton Airport and plans to increase passenger capacity will only further worsen the already adverse situation. Our objections are broadly covered by the following three areas: 1. Air traffic noise 2. Pollution 3. Transport infrastructure	<p>Noted.</p> <p>The Environmental Statement (ES) includes a robust assessment of effects on a range of environmental aspects as agreed with stakeholders through the Environmental Impact Assessment (EIA) Scoping and assessment process; including Chapter 16 Noise and Vibration [AS-080], Chapter 20 Water and Resources [AS-031], Chapter 7 Air Quality [AS-076], and Chapter 18 Traffic and Transportation [AS-030], of the ES.</p> <p>The impact of transport infrastructure is assessed in the Transport Assessment [APP-200 to APP-203, AS-123, APP-205 to APP-206]</p>

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Datchworth Parish Council RR-0316	General	Datchworth Parish Council supports the position of LANACAN (Luton and District Association for the Control of Aircraft Noise) and other objecting organisations in resisting developments which would increase passenger numbers beyond that already agreed and approved. The current proposal represents a significant expansion in operations which is likely to have severe repercussions to the detriment of the quality of life of those living in the vicinity of flightpaths and exacerbating noise nuisance. There is real concern regarding the potential environmental impact of such airport expansion and in particular with the inevitable associated air and noise pollution, and impact on quality of life and countryside. DPC is aware of the potential advantages of the scheme in terms of additional employment generation, investment opportunities and economic growth. However, the planning balance is such that the environmental drawbacks arising would outweigh any defined benefits of the scheme	Noted. The impact of noise (day and night) due to 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 Environmental Statement (ES).

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Whipsnade Parish Council RR-1585	Noise	<p>The civil parish of Whipsnade lies underneath the flight path for aircraft landing to the east at Luton Airport runway 07 with approaches of landing aircraft at heights approximately 2,000 ft. above G.L. creating a broad swathe noise contour affecting a high proportion of properties in the village, especially around the Green and Oldhill Wood. The noise disturbance is accentuated by aircraft power and flap adjustments required at the particular stage of approach (between 7 and 8 miles from arrival/ touchdown) and is especially problematical for nighttime/ very early morning (00.00 - 06.00) arrivals which are frequent and likely to increase with the expansion of permitted passenger numbers now proposed. We are beginning to notice, possibly attributed to climate change, the increased frequency of anti-cyclonic conditions over UK which gives rise to winds with an easterly component, often over extended periods in the summer months, which then necessitate use by the airport controllers of 07 (Easterly) approaches over Whipsnade.</p>	<p>It is noted that Whipsnade is overflowed by easterly arrivals, which is a necessity as aircraft must be aligned with the runway on arrival for safety reasons.</p> <p>The impact of noise (day and night) 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 Environmental Statement (ES)</p>

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Edlesborough Parish Council RR-0404	Passenger forecasting	<p>Edlesborough Parish Council wish to register as an interested party regarding the Luton Airport DCO for the proposed increase in passenger numbers from 18 million to 32 million mppa. The village of Dagnall which is part of Edlesborough Parish, is directly beneath the final approach during easterly operations. Dagnall is approximately 7nm from start of the runway and is consequently overflowed by all arriving aircraft during easterly operations. The number of ATMs is therefore critical. As we understand it, LR are claiming that they can achieve a 78% increase in passenger numbers with an increase of only 48% in ATMs, primarily as a consequence of the use of larger aircraft and higher load factors. However the only overall metric that they are suggesting be included in the consent is mppa, which of course would mean that if the larger aircraft and higher load factors don't materialise, the eventual outcome would be an increase of 78% in ATMs not 48%. We would like to see an overall cap on ATMs (day and night time combined) as well as mppa. That way if the load factors don't increase as anticipated, the limiting parameter becomes ATMs rather than mppa.</p>	<p>Although the number of aircraft movements is only projected to increase by 48%, the number of commercial aircraft movements is projected to grow by 61% from 2019 levels to 32 mppa, reflecting the known up-gauging of seating capacities as new generation aircraft are introduced and also the allowance for some long haul activity with larger aircraft in the longer term.</p> <p>This is because no growth in business aviation and cargo activity (which account for 31% of movements) is expected. No additional facilities or apron space are proposed to allow growth in these activities and strict controls on noise at night will limit the scope to grow cargo activity.</p> <p>This is explained in section 6 of the Need Case [AS-125].</p>

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Edlesborough Parish Council RR-0404	Noise	<p>LR are also claiming that there will be an overall reduction in the area and population covered by the relevant noise contours during the life of the project, despite the increase in ATMs. This is attributed to the predicted noise improvements of the new generation of aircraft that will make up the future fleet. Those new aircraft have already started to be introduced to the fleet and the noise data is showing that the anticipated improvements are not being fully realised in practice, but no allowance has been made for that fact in the predicted noise contours. However even if the predicted improvements are eventually realised, those improvements primarily affect departures and not arrivals. Consequently the shape of the contours will change. The predicted contours shown during the LR pre-consultation clearly showed that whilst the overall area covered by the noise contours might be smaller, the contours generated by arriving aircraft are extended further west into Buckinghamshire. That is due to more aircraft that aren't fundamentally any quieter on the final approach path. We would like to see a commitment that the 2019 baseline noise contour boundaries will not be extended in any direction, and not simply that the total area under the contours is not increased. These</p>	<p>It is not the case that no allowance has been made for measured data of new generation aircraft and that there are no improvements in noise from new generation aircraft.</p> <p>The noise model used for the assessment of aircraft noise in Chapter 16 Noise and Vibration [AS-080] of the Environmental Statement (ES) has been validated based upon actual measurements of technological improvements of new generation aircraft. The measurements indicate that there are improvements on noise for both departures and arrivals.</p> <p>The potential for setting a contour area shape (rather than area) Limit was considered by the Noise Envelope Design Group (NEDG), which contained representatives from industry, community groups, local authorities and independent experts. The final recommendation from the NEDG was that contour areas should be used to set Thresholds and Limits, without including contour shapes as</p>

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		additional restrictive conditions would allow some expansion of the Airport by taking advantage of whatever improvements in the noise performance are eventually achieved, whilst limiting the additional harm to residents under the final approach path.	this is influenced by factors outside of the control of the airport operator (see Annex A and Annex B of Appendix 16.2 Operational Noise Management (Explanatory Note) [AP-111] of the Environmental Statement (ES).

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Wingrave with Rowsham Parish Council RR-1592	Air Quality/surface access	The Parish Council is concerned about the increase in the number of flights and the flight path(s) affecting the immediate air quality in and around Luton as this Parish is under current flight paths for Luton and other airports. Also of concern is the increase in construction traffic causing disruption to many people (as seen with HS2 in this Parish) and then the huge increase in passenger numbers and the resulting transport issues as a consequence. So main concerns relate to the effects on the transport network, air quality and the environment.	<p>Assessments of the impacts to air quality and changes to traffic and transportation due to the Proposed Development have been undertaken and reported in Chapter 7 Air Quality [APP-034] and Chapter 18 Traffic and Transportation [AS-030] of the Environmental Statement (ES).</p> <p>Both assessments identify study areas in which potential significant effects were identified and locations and receptors in the study areas included in the Environmental Impact Assessment (EIA) and effects reported in the ES. No significant effects on air quality were reported, and most construction traffic would use the M1.</p>
Caddington Parish Council RR-0170	Noise	We thank you for the opportunity to comment, on yet another revised Luton Airport expansion plan, the fourth such consultation within five years. We note that the amount of documentation is now so comprehensive that it is not possible, to respond effectively to it. However, our serious concerns about the airport expansion remain. 1 – Increased Noise levels : Sound monitoring based in Caddington already registers sound levels	The volume of documentation is necessarily comprehensive given the scale and technical nature of the application. However, a Non-technical Summary [APP-165] of the Environmental Statement (ES) has been produced to assist the reader in understanding the impacts of the Proposed Development.

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		<p>more than agreed. We believe this will only be made worse by the increase in flights. The inhabitants of our village estimate noise by the number of times a conversation has to be interrupted in the garden or the street by an aircraft passing overhead, which may be ten times in a half hour of batch take-offs during summer months. Doubling the number of flights, with a take off every 90 seconds, will double the problem by 2043. It is worth noting that the flight path changes will have no impact in the parish as immediate take off and landing paths cannot be changed.</p>	<p>The impact of noise (day and night) due to 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.</p>
Caddington Parish Council RR-0170	Traffic and Transport	<p>2 – “Fly Parking”: Residents consistently complaint about valuable parking spaces being taken by passengers parking in the village while using the airport. The cars disappear when the passengers return from their trip.</p>	<p>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 (GCG) targets.</p>

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			<p>The Transport Assessment [APP-203 to APP-206] and Surface Access Strategy [APP-228] set out the monitoring and mitigation measures being proposed. As part of the ongoing review process, the Applicant intends to produce monitoring programs, assess any impacts, and then intervene accordingly for any remaining issue.</p> <p>The Applicant has provided support to local areas where there is a realistic opportunity for people to 'flypark' in local streets. The Applicant considers the likelihood of an increase of passengers and staff 'flyparking' remotely in villages and Parishes surrounding the airport as part of the Proposed Development very low. If such instances do occur, the Applicant would welcome discussions through the Airport Transport Forum to raise these issues and discuss potential solutions.</p>

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Caddington Parish Council RR-0170	Climate Change/Air Quality	3 – Significant Environmental impact – we believe the expansion will see a significant increase in air pollution which runs in direct contradiction to a move to zero emissions worldwide.	<p>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.</p> <p>The UK Government has introduced a range of measures to control carbon emissions. 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 <i>“we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth”</i>. 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.</p> <p>The UK Emissions Trading Scheme and the Carbon Offsetting and Reduction Scheme for International Aviation are other tools to control carbon emissions.</p>

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			<p>An assessment of changes to greenhouse gases and air quality due to the Proposed Development is provided in Chapter 12 Greenhouse Gases [APP-038] and Chapter 7 Air Quality [APP-034] of the Environmental Statement (ES) respectively.</p> <p>The air quality assessment has provided an assessment of air quality in line with National Legislation, no significant impacts are predicted for air quality.</p>
Caddington Parish Council RR-0170	Traffic and Transport	4 – Infrastructure- Our roads already suffer under the burden of traffic. Pot holes and road surfaces are slow to be repaired and increased flights will increase the associated traffic etc. Damaging the roads further. We therefore are strongly opposed to your proposals. Caddington Parish Council	A means of monitoring airport-related traffic on the local highway network, named the Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA), is under consideration and will be reported in due course. This is being developed from the Outline TRIMMA (Appendix I to the Transport Assessment [APP-202]) which provides the framework and guidance on the contents of the forthcoming TRIMMA.

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			The Applicant is willing to enter discussions with local authorities (the organisations responsible for the maintenance of the highway network) with regard to mitigation schemes in their local residential areas where there is a clear demonstration that there are problems related to airport related traffic.
Kensworth Parish Council RR-0799	Noise	The main objection the Parish Council wish to note is: Unacceptable increased Noise Pollution expected from significant rise in the number of passengers from 18m to 32m, in particular night flights.	The impact of noise (day and night) due to 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 Environmental Statement (ES).

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Pitstone Parish Council RR-1218	Noise	Pitstone Parish Council wishes to register as an interested party and continue engagement with this consultation. Pitstone is one of the settlements likely to see an increase in aircraft noise from these proposals. We perceive the main concerns to be: * We are directly overflown by landings when the airport is flying easterlies * Historically easterlies have occurred more often during the summer, meaning that Pitstone gets more flights at the time when people are more likely to be outside and/or have windows open * Night flights when windows are open are particularly troublesome because the area is mostly quiet overnight * The fact that airlines are switching to newer aircraft is changing what is acceptable in terms of night flights Subject to data verification (which is presently being undertaken), we believe that: * The proportion of easterly flying is increasing * We seem to also be affected by takeoffs when flying easterlies	<p>The impact of noise due to aircraft movements from the Proposed Development (day and night) 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 Environmental Statement (ES).</p> <p>The proportion of easterly or westerly flight is determined by the wind direction, as aircraft need to fly into the wind for safety reasons. Whilst the proportion of easterly operations was unusually high in 2021 and 2022, the long-term trends do not suggest that the proportion of easterly flying is substantially increasing.</p>
Preston Parish Council RR-1220	Community	1. Preston Parish Council objects to the proposals put forward and strongly oppose any further capacity expansion at Luton Airport for the following reasons: Impact on Communities: The quality of life in Hertfordshire has already been degraded by the numbers of arriving and departing flights at Luton airport. The proposed	An assessment of the impact on communities has been undertaken and reported in Chapter 13 Health and Community [APP-039] of the Environmental Statement (ES). This assessment inherently considers impacts and results as identified under

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		expansion would lead to an increase in noise, pollution and light pollution which would further impact on Hertfordshire residents causing loss of sleep and other negative health effects which have an impact on people's wellbeing.	Chapter 7 Air Quality [APP-034]), Chapter 16 Noise and Vibration [AS-080]), Chapter 14 Landscape and Visual [APP-049], Appendix 5.2 Light Obtrusion Assessment Part A [APP-052] and Appendix 5.2 Light Obtrusion Assessment Part B [APP-053] of the ES, identifying health and community effects.
Preston Parish Council RR-1220	Landscape and Visual	2. Wigmore Valley Park: While we acknowledge that plans include the provision of additional parkland to replace Wigmore Valley Park which will be used for the proposed new terminal, we object to the proposal because overall a large amount of green space will be permanently destroyed to the detriment of the local and wider community, wildlife habitats will be lost and irretrievable damage will be caused to an area of outstanding natural beauty. It has been proven that green space is beneficial to health and well-being and this vital aspect would be removed from the lives of people in the surrounding area who at present have a larger area of green space and countryside than would be available if this proposal went ahead.	Open space has been carefully considered as part of the Proposed Development. Replacement open space will be provided as described in Chapter 4 The Proposed Development [APP-031] of the Environmental Statement (ES). The open space provided will be at least 10% bigger than available currently. An assessment of health and community effects associated with changes to Wigmore Valley Park is reported in Chapter 13 Health and Community [APP-039] of the ES. Biodiversity impacts due to changes in Wigmore Valley Park have been

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			<p>assessed and reported in Chapter 8 Biodiversity [AS-027] of the ES.</p> <p>The proposed open space, and habitat provision and long-term management ensures that overall, a biodiversity net gain of over 10% will be delivered.</p>
Preston Parish Council RR-1220	Traffic and Transport	<p>3. Road Infrastructure: Preston is a small village with very narrow lanes which are already busy at peak times with traffic between Luton and Stevenage using the village as a short cut rather than travelling on the A505 and A602 which are often grid locked. These lanes were not built to withstand the current amount of traffic, let alone the increase which the proposed expansion of passenger numbers would create. This would further damage and erode the lanes and have a detrimental effect on the daily lives of local people. The position of the proposed Terminal 2 at Wigmore Valley Park means access would be easier from the rural lanes and villages than from the main roads through Hitchin and Luton and this is not acceptable.</p>	<p>A means of monitoring airport-related traffic on the local highway network is under consideration and will be reported in due course. Traffic calming in Preston is not currently seen as necessary as a result of the Proposed Development.</p> <p>The application includes a number of highway improvements measures which have been focussed on the main routes into the Airport to seek to ensure as far as reasonably possible that traffic uses the main road network.</p> <p>However, to ensure that the volumes of traffic (both existing and forecast) can be accommodated, discussions are ongoing with relevant local authorities. In addition, the Applicant</p>

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			and operator will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as set out within the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) (Appendix I of the Transport Assessment [APP-202]) and there is an opportunity through this process to identify any impacts that are being realised in future and seek to investigate the potential implementation of traffic management and/or parking control measures in rural areas, in order to dissuade vehicles from using these roads to access the airport.
Preston Parish Council RR-1220	Climate Change	4. Climate Change: Future Luton has not taken climate change into account in these proposals. Preston Parish Council would like to see the owners and operators of London Luton Airport focus on delivering appropriate mitigations for noise, pollution and increased carbon emissions and ensuring that they abide by all the current planning conditions, including the numbers of both flights and passengers before expansion is considered.	<p>An assessment of changes to Greenhouse Gases (GHG) due to the Proposed Development is provided in the Chapter 12 Greenhouse Gases [APP-038] of the Environmental Statement (ES).</p> <p>An assessment of climate change resilience and potential climate change impacts is provided in Chapter 9</p>

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			<p>Climate Change Resilience [AP-035] of the ES.</p> <p>Compliance with existing planning conditions is a matter between the current operator and the local planning authority.</p>
Bourn Parish Council RR-0155	Noise	1. I serve as a Councillor on Bourn Parish Council in South Cambs. Residents of Bourn have raised concerns - both during the AD6 consultation process, and since it's implementation in 2022 - about the significant increase in noise, and especially overflights late into the night, and early in the morning - which are reported to be disturbing sleep, and more broadly spoiling what was previously a quiet, rural area with very low ambient background noise levels. Concerns have been raised about the high frequency of approaches being made over the Bourn/Cambourne area - as often as every 3-5 minutes, and the use of speed-brakes, which are especially disruptive.	The impact of noise (day and night) due to 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 Environmental Statement (ES).
Bourn Parish Council RR-0155	Air Quality	2. Some residents have also raised concerns about the convoluted northern AD6 approach route, wasting fuel, and deploying CO2 and exhaust particulates over the South Cambs area - with due health and environmental concerns.	An assessment of changes to Greenhouse Gases (GHG) and air quality due to the Proposed Development is provided in Chapter 12 Greenhouse Gases [APP-038]

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		Local fears are that LLA expansion will increase these problems, and I therefore wish to register to ensure our Parish is duly consulted.	and Chapter 7 Air Quality [APP-034] of the Environmental Statement (ES), respectively. The air quality assessment has provided an assessment of air quality in line with National Legislation, no significant impacts are predicted for air quality.
Ivinghoe Parish Council RR-0587	Noise	Ivinghoe PC has concerns about the proposed expansion of Luton Airport for the following reasons:- It will have a detrimental effect on the quality of life of our parishioners because :- a) An increase in flights will increase noise pollution during the day and extend that noise into the night and early morning. (IPC already receive many complaints about existing noise pollution from flights to and from Luton). IPC understands that no noise monitoring is done in our area due to inadequacies in the technology used to do so.	The impact of noise (day and night) due to 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 Environmental Statement (ES).
Ivinghoe Parish Council RR-0587	Traffic and Transport	b) Due to increased flights there will also be an increase in passenger and freight road traffic to Luton through our villages which were never built to stand the current volume of traffic let alone any increases. There are no ground transport links from our area to Luton Airport so the	A means of monitoring airport-related traffic on the local highway network is under consideration and will be reported in due course. Traffic calming in Ivinghoe - in addition to the calming already in place - is not currently seen as necessary as a result of the

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		villages will suffer from increased local traffic as well as increased through traffic.	<p>Proposed Development. It is considered likely that most additional traffic travelling in this area (e.g. between Luton Airport and towns such as Tring, Wendover and Princes Risborough) will not need to travel through the village of Ivinghoe.</p> <p>However, to ensure that volumes of traffic (both existing and forecast) can be accommodated, discussions are ongoing with relevant local authorities. In addition, the applicant and operator will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as set out within the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) (Appendix I of the Transport Assessment [APP-202]) and there is an opportunity through this process to identify any impacts that are being realised in future and seek to investigate the potential implementation of traffic management and/or parking control measures in rural areas, in order to dissuade</p>

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			vehicles from using these roads to access the airport.
Ivinghoe Parish Council RR-0587	Noise	c) Our parish is also just outside the noise mitigation zone offered by Luton Airport.	<p>Eligibility for the noise insulation scheme is determined by noise exposure contours, so areas that are outside the areas of eligibility are not eligible for insulation as they are exposed to lower noise levels.</p> <p>Refer to Draft Compensation Policies Measures and Community First [AS-128] for more information on the noise insulation eligibility criteria.</p>
Ivinghoe Parish Council RR-0587	Noise	d) As our parish is in the flight zones of, Heathrow, Stansted & Luton. 1 of which is expanding and Luton is looking to expand, our parish will suffer a double effect of increased air traffic.	<p>Cumulative impacts due to other airport proposals have been considered in Chapter 21 In-combination and Cumulative Effects [AS-032] of the Environmental Statement (ES).</p> <p>Changes to airspace and flightpaths are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate</p>

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			consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course.
Ivinghoe Parish Council RR-0587	AONB	It will have a detrimental effect on the environment because :- a) An increased in flights will increase noise, light and traffic pollution over our AONB disturbing our native and in some cases rare wildlife.	<p>Ivinghoe is outside of the Lowest Observable Adverse Effect Level (LOAEL) for aircraft noise and therefore no adverse noise effects are anticipated (for the full assessment of noise and vibration, refer to Chapter 16 Noise and Vibration [APP-042] of the Environmental Statement (ES)).</p> <p>Ivinghoe is not anticipated to be affected by light obtrusion. A lighting assessment has been undertaken, as presented in Appendix 5.2 Light Obtrusion Assessment Part A [APP052] and Appendix 5.2 Light Obtrusion Assessment Part B [APP-053] of the ES.</p> <p>The assessment undertaken and reported in section 14.9 of Chapter 14 Landscape and visual [APP-152] of the ES draws on its judgements when considering the sensitivity and value of</p>

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			<p>landscape receptors, when considering the value of views experienced by visual receptors, and when determining the magnitude of impact on landscape and visual receptors.</p> <p>The Light Obtrusion Assessment does not expressly assess impacts to the Chilterns Area of Outstanding Natural Beauty (AONB), but demonstrates that the Proposed Development is substantially below the acceptable limits set out for Upward Flux Ratio (sky glow) and nuisance caused by the lighting installation, in line with the recommendations within Institute of Lighting Engineers Guidance Note 1. It can therefore be demonstrated that the visible effects of obtrusive light within the Chilterns AONB resulting from the Proposed Development, would not be noticeable in the context of wider sky glow observed during the time of survey.</p> <p>Impacts to the surrounding road network have been assessed and reported in Chapter 18 Traffic and</p>

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			<p>Transport [AS-044] of the ES. Effects on biodiversity have been assessed and reported in Chapter 8 Biodiversity [AS-027] of the ES and no significant effects in the AONB were identified.</p> <p>An assessment of effects of the Special Qualities of the AONB is under discussion with Natural England and when complete will be made available during the examination at a suitable deadline.</p>
Ivinghoe Parish Council RR-0587	Climate Change	b) An increase in flights will increase the use of fossil fuels and further exacerbate global warming.	<p>An assessment of greenhouse gas changes due to the Proposed Development is provided in Chapter 12 Greenhouse Gases [APP-038] of the Environmental Statement (ES).</p> <p>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 Emissions Trading Scheme</p>

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			<p>(UK ETS) within the European Economic Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).</p> <p>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 Greenhouse Gas (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.</p>

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			<p>Carbon Offsetting and Reduction Scheme for International Aviation (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.</p>
Ivinghoe Parish Council RR-0587	Landscape and Visual	c) As our parish is one of the few dark parishes, we have recently invested in a move from sodium lightening to LED and additional aircraft	At this location, aircraft are at over 7,000ft, therefore light obtrusion from passing aircraft is unlikely.

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		flights over the parish during the night will negate all the good work we have invested in.	A lighting assessment of the Proposed Development has been undertaken, as presented in Appendix 5.2 Light Obtrusion Assessment Part A [APP052] and Appendix 5.2 Light Obtrusion Assessment Part B [APP-053] of the Environmental Statement (ES), and light has also been considered in Chapter 14, Landscape and Visual [AS-079] of the ES.