

February 2024

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)
8.167 Section 106 Agreement

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.167

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

8.167 SECTION 106 AGREEMENT

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DATED

9th February

2024

- (1) LONDON LUTON AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) CENTRAL BEDFORDSHIRE COUNCIL
- (4) DACORUM BOROUGH COUNCIL
- (5) HERTFORDSHIRE COUNTY COUNCIL
- (6) LUTON BOROUGH COUNCIL
- (7) NORTH HERTFORDSHIRE DISTRICT COUNCIL
- (8) ROYAL BANK OF SCOTLAND PLC

AGREEMENT

relating to London Luton Airport

Section 106 Town and Country Planning Act 1990 and section
111 Local Government Act 1972



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THIS AGREEMENT is dated

9th February

2024

BETWEEN

- (1) LONDON LUTON AIRPORT LIMITED (**the Applicant**) of Hart House Business Centre, Kimpton Road, Luton, Bedfordshire, LU2 0LA;
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED (**LLAOL**) of Percival House 134 Percival Way, London Luton Airport, Luton, United Kingdom, LU2 9NU;
- (3) CENTRAL BEDFORDSHIRE COUNCIL (**CBC**) of Priory House, Monks Walk, Chicksands, Shefford SG17 5TQ;
- (4) DACORUM BOROUGH COUNCIL (**DBC**) of The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN;
- (5) HERTFORDSHIRE COUNTY COUNCIL (**HCC**) of County Hall, Pegs Lane, Hertford SG13 8DQ;
- (6) LUTON BOROUGH COUNCIL (**LBC**) of Luton Council, Town Hall, Luton LU1 2BQ;
- (7) NORTH HERTFORDSHIRE DISTRICT COUNCIL (**NHDC**) of Council Offices, Gernon Rd, Letchworth Garden City SG6 3JF; and
- (8) ROYAL BANK OF SCOTLAND PLC (**the Mortgagee**), Level 9, 250 Bishopsgate, London EC2M 4AA.

together the '**Parties**'

WHEREAS

- (A) CBC is the local planning authority and highway authority for an administrative area in respect of which part of the Development is situated;
- (B) DBC is the local planning authority for an administrative area in respect of which part of the Development is situated;
- (C) HCC is the County Council and highway authority for an administrative area in respect of which part of the Development is situated;
- (D) LBC is the local planning authority and highway authority for an administrative area in respect of which the Development is situated;
- (E) NHDC is the local planning authority for an administrative area in respect of which part of the Development is situated;

together '**the Councils**'

- (F) The Applicant is the freehold owner of the interests registered at the Land Registry under title numbers BD180578, BD200841, BD180578 and HD583859 and has interests in land in the areas of the Councils (save for DBC) as identified in Schedule 1 and on the Freehold Site Plan.

- (G) On 27 February 2023 the Applicant applied to the Secretary of State for Transport (c/o The Planning Inspectorate) under section 37 of the Planning Act 2008 for a development consent order entitled the 'London Luton Airport Expansion Development Consent Order' (the **Development Consent Order**).
- (H) There is an existing planning permission with reference 17/02300/EIA that was granted on 29 June 2021 which relates to part of the Site and a section 106 agreement dated 25 June 2021 between Luton Borough Council, London Luton Airport Limited, London Luton Airport Operations Limited and Royal Bank of Scotland Plc linked to that permission (which agreement is referred to as the **Green Horizons Park S106**).
- (I) There is an existing planning permission with reference 21/00031/VARCON that was granted on 13 October 2023 which relates to part of the Site and a section 106 agreement dated 9 December 2022 between Luton Borough Council, London Luton Airport Operations Limited, London Luton Airport Limited and the Mortgagee linked to that permission.
- (J) The Development Consent Order would enable the Applicant to acquire rights in land, to construct various works and exercise powers for the purposes of, and in connection with, the expansion of London Luton Airport in south east Luton and will extend the current operational airport with the construction of a new passenger terminal and additional aircraft stands to the north east of the runway.
- (K) LLAOL is the airport operator of the Airport pursuant to a concession agreement dated 20 August 1998 entered into with the Applicant for the management, operation and development of the airport. LLAOL is the lessee of the Site under leases dated 20 August 1998 and 25 February 1999 between the Applicant, LBC (not as local planning authority) and LLAOL each for a term of 30 years from 20 August 1998 and these leasehold interests are registered at HM Land Registry under title numbers BD2060481 and BD216008 respectively and subject to a charge in favour of the Mortgagee. LLAOL has interests in land in the areas of the Councils (save for DBC) as identified in Schedule 1 and on the Leasehold Site Plan.
- (L) The Parties enter into this Deed in order to secure the development consent obligations (within the meaning of section 106(14) of the 1990 Act, as inserted by s174(2) of the 2008 Act), section 111 of the Local Government Act 1972 and all other enabling powers.

NOW IT IS HEREBY AGREED AS FOLLOWS

1 Interpretation

- 1.1 In this Deed the following terms and expressions have the following respective meanings unless otherwise stated:

1972 Act	means the Local Government Act 1972;
1990 Act	means the Town and Country Planning Act 1990;
2008 Act	means the Planning Act 2008;
Airport	means London Luton Airport;

ANMP	means the Air Noise Management Plan [Application Document Reference: TR020001/APP/8.125] and certified under article 50 of the Development Consent Order;
Application	means the application submitted by the Applicant to the Secretary of State on 27 February 2023, pursuant to section 37 of the 2008 Act for development consent for the expansion of the airport;
Authorised Development	has the meaning ascribed to the term “authorised development” within the Development Consent Order;
Business Day	means any day apart from Saturday, Sunday and any statutory bank holiday on which clearing banks are closed in England for the transaction of ordinary business;
Commencement	means the carrying out of a material operation as defined Schedule 2 of the Development Consent Order, and the words ‘Commence’ and ‘Commenced’ and cognate expressions shall be construed accordingly;
Community Fund	means the fund established by LLAOL as referred to in Schedule 8 and currently administered by the Bedfordshire and Luton Community Foundation under which community projects are funded within the Local Area;
Compensation Code	means the code of statute and case law used to determine the compensation (including but not limited to costs, fees, interest (as prescribed by the Acquisition of Land (Rate of Interest after Entry) Regulations 1995 or any other regulations replacing those regulations), stamp duty and VAT) to be paid to landowners and occupiers whose land or rights in land are authorised by or under any statute, to be compulsorily acquired or in which new rights may be compulsorily acquired, or whose land may be temporarily occupied, as modified by the Development Consent Order;
Councils	means Dacorum Borough Council, Central Bedfordshire Council, Hertfordshire County Council, Luton Borough Council, North Hertfordshire District Council, or (as the context may require) any one or more of them;
Departure Noise Violation Fine System	means a system to be operated pursuant to the ANMP through which such financial penalties as LLAOL considers to be reasonable are levied on an airline on any occasion when an aircraft which it operates at the Airport breaches the noise levels set in the ANMP;
Design Principles	means the Development Consent Order document with Application Document Reference: TR020001/APP/7.09 and certified under article 50 of the Development Consent Order;

Design Review Panel	means a panel appointed to conduct an independent review of certain elements of the proposed design of the Authorised Development;
Dispute	means any dispute, issue, difference or claim as between the Parties in respect of any matter contained in or arising from or relating to this Deed or the Parties' obligations and rights pursuant to it (other than in respect of any matter of law);
Employment and Training Strategy	means the Development Consent Order document with Application Document Reference: TR020001/APP/7.05 at Appendix 4 ;
ESG	has the same meaning as in Part 1 of Schedule 2 the Development Consent Order;
Expert	means a person appointed in accordance with the provisions of Clause 11 to determine a dispute between the Parties to this Deed;
Freehold Site Plan	means the plan at Appendix 1 showing the freehold interest of the Applicant as set out in Schedule 1;
Independent Body	means the Bedfordshire and Luton Community Foundation (or an alternative body nominated by LLAOL);
Index Linked	<p>means that any sum so described in this Agreement shall be increased by an amount in proportion to the increase in the All Items Index of Retail Prices ("RPI Index") issued by the Office for National Statistics from the date of this Agreement (and for the Sports Pitch and Changing Room Re-Provision Contribution the relevant date is 25 June 2021) until the date on which such sum is paid in accordance with the following formula:</p> $X = \text{£Y} \times B/A$ <p>Where:</p> <p>X is the sum in question after application of this formula;</p> <p>£Y is the sum due under this Agreement to which this formula is applied;</p> <p>A is the value of the RPI Index last published before the date of this Agreement;</p> <p>and</p> <p>B is the value of the RPI Index last published before sum (£Y) is paid provided that if the RPI Index shall cease to exist, there shall be substituted such other index as shall be specified by the Councils acting reasonably;</p>
Leasehold Site Plan	means the plan at Appendix 1 showing the leasehold interest of LLAOL as set out in Schedule 1;

Local Area	means together the administrative areas of Luton Borough Council, Central Bedfordshire Council, North Hertfordshire District Council, Stevenage Borough Council, St Albans City and District Council, Dacorum Borough Council and the Aylesbury Vale area of Buckinghamshire Council;
Replacement Land	means the replacement land as defined in article 35(4) of the Development Consent Order (comprising land plots 5-13 and 6-20);
Secretary of State	means the Secretary of State for Transport;
Site(s)	means the site(s) in which the Applicant and/or LLAOL has an interest as set out in Schedule 1 and shown on the Site Plans;
Site Plans	means the Freehold Site Plan and the Leasehold Site Plan appended to this Agreement at Appendix 1 showing the freehold interest of the Applicant and the leasehold interest of LLAOL as set out in Schedule 1;
Sports Pitch and Changing Room Re-Provision Contribution	means the sum of £1,196,737 (one million one hundred and ninety six thousand and seven hundred and thirty-seven pounds) payable in accordance with Schedule 2;
Track Violation Penalty System	means a system to be operated pursuant to the ANMP through which such financial penalties as LLAOL considers to be reasonable are levied on an airline on any occasion when the aircraft which it operates at the Airport deviates from the noise preferential route without specific instruction to that effect from air traffic control or other than due to adverse weather conditions or aircraft technical issue;
Wigmore Valley Park	means for the purposes of Schedule 2 the existing Wigmore Valley Park shown cross hatched and coloured green on the plan at Appendix 2 and for the purposes of Schedule 3 the park that will occupy the land shown cross hatched and coloured orange on the plan at Appendix 3 as a result of the Authorised Development including the Replacement Land;
Wigmore Valley Park Community Trust	means the trust to be established as a registered charity for the management and maintenance of Wigmore Valley Park in accordance with Schedule 3;
Wigmore Valley Park Community Trust Operational Management Plan	means a plan to be prepared by the Applicant pursuant to Schedule 3 and approved by LBC for the ongoing management of Wigmore Valley Park;

**Wigmore Valley
Park Management
Fund**

means a fund to be established by the Applicant of £250,000 per annum to be paid to the Wigmore Valley Park Community Trust in accordance with Schedule 3 for the ongoing management of Wigmore Valley Park and for running costs associated with the Wigmore Valley Park Community Trust.

1.2 In interpreting this Deed:

- 1.2.1 words incorporating the singular shall include the plural and vice versa, words importing any gender include every gender;
- 1.2.2 words incorporating persons shall include firms, companies and corporations and vice versa;
- 1.2.3 references to the Councils shall include any successors to their relevant statutory and other functions;
- 1.2.4 references to LLAOL shall include any successors in title to LLAOL and any future operator of the Airport;
- 1.2.5 references to numbered clauses, paragraphs or schedules are unless otherwise stated references to the relevant clauses of, paragraphs of and schedules to this Deed;
- 1.2.6 references to numbered articles, schedules, parts and paragraphs of the Development Consent Order are unless otherwise stated references to the numbered articles, schedules, parts and paragraphs comprised within the draft Development Consent Order (Revision 10) comprised within the Application at the time that this agreement is made but are to be interpreted as being adjusted to the extent necessary to accord with the provisions of the Development Consent Order as made;
- 1.2.7 words denoting a requirement or an obligation on a Party to do any act, matter or thing include an obligation to procure that it can be done and words placing a party under a restriction include an obligation not to cause, permit or suffer any infringement of the restriction;
- 1.2.8 references in this Deed to statutes, by-laws, regulations, orders and delegated legislation shall include any statute, by-law, regulation, order or delegated legislation amending, re-enacting or made pursuant to the same as current and in force from time to time;
- 1.2.9 if any provision of this Deed shall be held to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions shall not in any way be deemed thereby to be affected, impaired or called into question;
- 1.2.10 the recitals and headings in this Deed are for ease of reference only and shall not affect its construction or otherwise have any binding legal effect;

- 1.2.11 references to 'the Parties' shall mean the Parties to this Deed and reference to a 'Party' shall mean any one of the Parties;
- 1.2.12 references to 'notice' shall mean notice in writing and notice served electronically;
- 1.2.13 references to 'including' shall mean including without limitation;
- 1.2.14 terms and expressions defined in the Schedules shall have the meanings specified wherever those terms and expressions are used in this Deed;
- 1.2.15 the Interpretation Act 1978 shall apply to this Deed.

2 Legal Effect

- 2.1 This Deed is made pursuant to section 106 of the 1990 Act, section 111 of the 1972 Act and all other enabling powers.
- 2.2 The obligations, covenants and undertakings on the part of the Applicant in this Deed are planning obligations in the form of development consent obligations (to the extent that they are capable of so being) and as such bind the Sites identified in Schedule 1 for the purposes of section 106 of the 1990 Act and are enforceable as such by the relevant Councils accordingly.
- 2.3 Insofar as the obligations, covenants and undertakings are not capable of being planning obligations they are entered into by the Councils pursuant to section 111 of the Local Government Act 1972 and all other powers enabling.

3 Local Land Charge

- 3.1 This Deed is a local land charge and shall be registered as such in accordance with Schedule 10.

4 Conditionality

- 4.1 Subject to Clauses 4.2 and 4.3, the Parties agree that clauses 5, 6 (save for the obligations in Schedule 10) and 10 shall not have operative effect until the Development Consent Order has come into force and all other clauses shall have operative effect from the date of this Deed.
- 4.2 In the event that the grant of the Development Consent Order becomes the subject of any judicial review proceedings including any approval on a redetermination:
 - 4.2.1 Until such time as such proceedings including any appeal have been finally determined, the terms and provisions of this Deed will remain without operational effect unless the Authorised Development has been Commenced or the notice under article 44(1) of the Development Consent Order has been served (whichever is earlier);
 - 4.2.2 if following the final determination of such proceedings the Development Consent Order is quashed and, in the event that the court orders the Application to be

remitted to the Secretary of State, the Application is subsequently refused, this Deed will cease to have any further effect; and

- 4.2.3 if following the final determination of such proceedings the Authorised Development is capable of being Commenced or the notice under article 44(1) of the Development Consent Order has or is capable of being served, or after final determination the DCO is re-granted then this Deed will take effect in accordance with its terms.

- 4.3 For the purposes of this Deed, proceedings by way of judicial review are finally determined (including in respect of a redetermination):

- 4.3.1 when permission to bring a claim for judicial review has been refused and no further application may be made;
- 4.3.2 when the court has given judgment in the matter and the time for making an appeal expires without an appeal having been made or permission to appeal is refused; or
- 4.3.3 when any appeal is finally determined and no further appeal may be made.

5 Development Consent Obligations

- 5.1 The Applicant covenants with the Councils to perform the obligations covenants and undertakings ascribed to it in the Schedules of this Deed.
- 5.2 The Parties agree that the development consent obligations contained in this Deed will not be enforceable against any owner of any land interest in the Site who is not a party to this Deed nor against any successors in title to or permitted assignees or any person claiming through or under other such owner's interest in the Site (save for the Applicant) unless that person becomes the undertaker as defined in article 2(1) of the Development Consent Order or as regards the obligations in clause 5.3 is the operator of the Airport.
- 5.3 LLAOL covenants with the Councils to perform the obligations, covenants and undertakings ascribed to it in Schedules 4, and 8 of this Deed.

6 Councils covenants

- 6.1 The Councils covenant with the Applicant and LLAOL to observe and perform the obligations ascribed to them in the Schedules to this Deed.

7 Release

- 7.1 Subject to Clause 7.2 the Applicant and/or LLAOL and its successors in title and those deriving title from them shall, upon disposing of the whole or any part of their respective interests in the Site, be released from all obligations in this Deed in relation to that interest or the relevant part thereof (as the case may be) but without prejudice to the rights of the parties in relation to any antecedent breach of those obligations.

- 7.2 In the event that the Applicant no longer has an interest in the Site but is still the undertaker as defined in article 2(1) of the Development Consent Order, this Deed shall remain enforceable against it by the Councils.
- 7.3 Subject to paragraph 7.4 the Applicant shall not transfer or lease the whole or part of the benefit of the Development Consent Order pursuant to article 8 (or any remaining benefit if some of the benefit has already been transferred) with a view to the transferee or lessee becoming the undertaker for the purposes of article 2(1) of the Development Consent Order unless the party to which it proposes to effect the transfer or grant has first entered into a Deed with the Councils on terms equivalent to this Deed (and in respect of which the Councils shall not unreasonably withhold or delay their agreement) or otherwise on terms acceptable to the Councils.
- 7.4 A transfer or lease under article 8 of the Development Consent Order shall not invoke clause 7.3 if (i) to a body specified in article 8(4)(c) to (j) of the Development Consent Order; and/or (ii) to the extent that the planning obligations herein bind the transferee or lessee by operation of law; and/or (iii) to the extent that a covenant herein is given directly by the transferee or lessee.

8 Further Planning Permissions and Development Consent Orders

- 8.1 Nothing in this Deed shall be construed as prohibiting or limiting the rights of the Applicant or LLAOL to use or develop any part of the Site in accordance with and to the extent permitted by, permitted development rights, planning permission, development consent or other statutory authority other than the Development Consent Order.

9 Expiry or Revocation

- 9.1 If the Development Consent Order expires or is revoked prior to the Commencement Date or service of the notice under article 44(1) of the Development Consent Order then this Deed shall forthwith determine and cease to have effect and the relevant Councils will forthwith cancel all entries made in their respective registers of local land charges in respect of this Deed.

10 Certificates of Compliance

- 10.1 The relevant Council (as appropriate) will upon request by the Applicant certify compliance or partial compliance with the provisions of this Deed.
- 10.2 If so requested by the Applicant the relevant Council will, subject to the Applicant reimbursing legal costs properly and reasonably incurred by the relevant Council in connection thereto, execute a deed of release or partial release from the relevant provisions of this Deed and promptly register the same in the register of local land charges maintained by the Councils (as appropriate).
- 10.3 Where the relevant Council (as appropriate) is obliged to execute a deed of release or partial release pursuant to Clause 10.2, the other Parties to this Deed shall (subject to the Applicant reimbursing legal costs properly and reasonably incurred by the Councils in connection thereto) enter into such deed to the extent necessary to effect such release or partial release.

11 Resolution of Disputes

- 11.1 In the event of any Dispute arising between the Parties as regards this Agreement, the Parties will attempt to resolve that Dispute amicably including holding a meeting attended by at least one senior representative from each Party.
- 11.2 If the Parties are unable to resolve the Dispute amicably pursuant to Clause 11.1, one Party may by serving notice on all other Parties ('the Notice') refer the Dispute to an Expert for determination.
- 11.3 The Notice must specify:
- 11.3.1 the nature, basis and brief description of the Dispute;
 - 11.3.2 the Clause or Paragraph of this Deed pursuant to which the Dispute has arisen; and
 - 11.3.3 the proposed Expert.
- 11.4 In the event that the disputant Parties are unable to agree whom should be appointed as the Expert within 10 Business Days after the date of the Notice then any disputant Party may request the President of the Law Society to nominate the Expert at the joint expense of the Parties in Dispute, and the Party making the request shall further request that such a nomination should be made within 10 Business Days of the request, and any failure for such nomination to be made within 10 Business Days shall entitle any Party to withdraw from the process of appointing an Expert and to refer the Dispute to the courts of England and Wales instead.
- 11.5 The Expert shall act as an expert and not as an arbitrator and the Expert's decision will (in the absence of manifest error) be final and binding on the Parties and the Parties in Dispute shall bear the costs associated with the Expert's determination of the Dispute:
- 11.5.1 in such manner as the Expert may determine and in doing so the Expert shall take into account the reasonableness of the Parties' respective positions leading to the Dispute arising between them and thereafter before its determination; or
 - 11.5.2 in the event that the Expert makes no determination as to costs, such costs will be borne by the Parties in Dispute in equal shares.
- 11.6 The Expert will be appointed subject to an express requirement that he or she reaches a decision and communicates it to the Parties within the minimum practicable timescale allowing for the nature and complexity of the Dispute and in any event not more than 28 Business Days from the date of the Expert's appointment to act.
- 11.7 The Expert will be required to give notice to each of the Parties inviting each of them to submit to the Expert within 10 Business Days written submissions and supporting material and will afford to each of the Parties an opportunity to make counter submissions within a further 5 Business Days in respect of any such submission and material.

12 Notices

- 12.1 Any notice, consent or approval required to be given under this Deed shall be in writing (in each case annotated with the reference 'London Luton Airport Expansion') and shall be sent to the address and marked for the attention of the persons identified below or instead to such other persons or address as may be notified by the Parties from time to time.
- 12.2 Any such notice must be delivered by hand or sent by first class post, registered delivery or courier service and shall conclusively be deemed, in the absence of evidence of earlier receipt, to have been received:
- 12.2.1 if delivered by hand, on the next Business Day after the day of delivery; and
 - 12.2.2 if sent by first class post, registered delivery or courier service within the United Kingdom, on the day falling 2 Business Days after the day posting or dispatch, exclusive of the day of posting or dispatch.
- 12.3 The address for service of any such notice, consent or approval as aforesaid is:
- 12.3.1 in the case of service upon the Councils the address provided at the front of this Deed for the relevant Council or such other address for service as the relevant Council may from time to time designate by written notice to the other Parties and any such notice shall be marked for the attention of:
 - (a) CBC: Principal Lawyer- Planning and Highways;
 - (b) DBC: Assistant Director- Planning;
 - (c) HCC: The Director of Law and Governance
Ref: 011466;
 - (d) LBC: The Section 106 Monitoring Officer;
 - (e) NHDC: Director of Legal & Community.
 - 12.3.2 in the case of service upon the Applicant, the address provided at the front of this Deed or such other address for service as the Applicant may from time to time designate by written notice to the other Parties and any such notice shall be marked for the attention of the Managing Director.
 - 12.3.3 In the case of service upon LLAOL the address provided at the front of this Deed or such other address for service as LLAOL may from time to time designate by written notice to the other Parties and any such notice shall be marked for the attention of the Company Secretary.
- 12.4 A Party or its successor may from time to time expressly give notice that it will accept service of notices, consents or approvals by electronic means, as specified in the notice and if it has done so, service upon that Party may (but need not) be effected in the manner so specified in the last such notice in addition to, or instead of, service by hand or by any other means set out

in Clause 12.2 and a document served by electronic means shall be deemed served on the next Business Day after sending.

13 Notice of Authorised Development

13.1 The Applicant shall provide notice to the Councils:

13.1.1 of the intended Commencement Date not later than 10 Business Days prior to the intended Commencement Date and the obligations in this Clause 13.1.1 shall re-apply in the event that Commencement does not occur on the intended date.

13.1.2 of the intended date of service of the notice under article 44(1) of the Development Consent Order not later than 28 Business Days prior to the intended date of service.

13.1.3 within 10 Business Days of the occurrence of each of the following:

- (a) the actual Commencement Date; and
- (b) the date of the service of the notice under article 44(1) of the Development Consent Order.

14 VAT

14.1 If this Deed or anything contained in it gives rise to a taxable supply for VAT purposes by the Councils to the Applicant, then the Councils shall use reasonable endeavours to recover VAT in the first instance.

14.2 If this Deed or anything contained in it gives rise to a taxable supply for VAT purposes by the Councils to Applicant then, subject to the Councils complying with Clause 14.1 the Applicant shall pay to the relevant Council or third party an amount equal to the VAT chargeable in addition to and at the same time as any payment or the provision of any other consideration for such supply upon provision of a valid VAT invoice addressed to the Applicant.

15 Approvals

Where any approval, agreement, consent, confirmation or an expression of satisfaction is required under the terms of this Deed such approval, agreement, consent, confirmation or expression of satisfaction shall be given in writing and shall not be unreasonably withheld or delayed.

16 Good Faith

The Parties agree with each other to act reasonably and in good faith in the discharge of the obligations contained in this Deed.

17 Rights of Third Parties

It is not intended that any person who is not a party to this Deed shall have any right under the Contracts (Third Parties) Act 1999 to enforce any term of this Deed.

18 Jurisdiction

- 18.1 This Deed including its construction, validity, performance and enforcement and any dispute or claim arising out of or in connection with it or its subject matter or formation (including non-contractual disputes or claims) shall be governed by and construed in accordance with English law.
- 18.2 Each Party irrevocably agrees that the courts of England and Wales shall have exclusive jurisdiction to settle any dispute or claim arising out of or in connection with this Deed or its subject matter or formation (including non-contractual disputes or claims).

19 Variations

- 19.1 No variation of this Deed shall be effective unless it is in writing and duly executed on behalf of each of the Parties.

20 Costs

- 20.1 The Applicant shall, on completion of this Deed, pay the proper and reasonable legal costs incurred by the Councils in accordance with and subject to the cap in the Planning Performance Agreement entered into with the Councils on 3 September 2019.

21 Counterparts

- 21.1 This Deed may be executed in any number of counterparts, each of which is an original and all of which together evidence the same deed.

22 Indexation of contributions

- 22.1 The following payments are Index-Linked:
- 22.1.1 Sports Pitches and Changing Room Re-provision Contribution payable to LBC;
 - 22.1.2 The Wigmore Valley Park Management Fund; and
 - 22.1.3 The annual payments made under paragraph 1.1 of Schedule 5.

23 Mortgagee Consent

- 23.1 The Mortgagee consents to LLAOL's obligations at clause 5.3 and acknowledges that the Site(s) shall be bound by them save that the Mortgagee (or any subsequent mortgagee or chargee) shall not be obliged to perform them unless it becomes a mortgagee in possession of

the Site(s). The Mortgagee, and any future mortgagee of the Site(s), shall have no liability after it has discharged the security or has disposed of the Site(s) which is subject to its security whether by sale or otherwise PROVIDED ALWAYS that the Mortgagee will not be released from any liability incurred prior to this.

This document has been executed as a deed and is delivered and takes effect on the date stated at the beginning of it.

SCHEDULE 1

1 Site(s) (as shown on the Site Plans)

The Applicant	Title Number BD180578 - Freehold BD200841- Freehold BD147909 - Freehold HD583959 - Freehold
LLAOL	BD206048 - Leasehold BD216008 - Leasehold

SCHEDULE 2

1 Re-provision of sports pitches

- 1.1 The Applicant covenants with LBC to pay the Sports Pitch and Changing Room Re-Provision Contribution to LBC on taking possession either compulsorily or by agreement where such possession restricts access to any part of Wigmore Valley Park by the public permanently for the purposes of constructing infrastructure for the purposes of expansion of the Airport pursuant to the DCO and no such possession of Wigmore Valley Park may occur until the Sports Pitch and Changing Room Re-Provision Contribution has been paid to LBC.
- 1.2 The Sports Pitch and Changing Room Re-Provision Contribution shall be used to provide a step 5 football facility (an artificial grass football pitch suitable for non-league senior football up to step 5 of the football pyramid and associated facilities including parking provision and changing rooms) at either one or more of the following locations; Stopsley/Lothair recreation ground, Luton and/or Ely Way/Lewsey Park recreation ground, Luton and/or the replacement of, or improvements to existing adult football facilities (playing pitches and supporting facilities such as changing rooms and car parking) at either one or more of the following locations: Stopsley/Lothair recreation ground, Luton and/or Lewsey Park recreation ground, Luton.
- 1.3 Should a payment be made to LBC by the Applicant relating to the Sports Pitch and Changing Room Re-Provision Contribution under Schedule 4 of the Green Horizons Park s106 the amount paid under that agreement will be set off against the Sports Pitch and Changing Room Re-Provision Contribution payable under this Agreement.
- 1.4 If any part of the Sports Pitch and Changing Room Re-Provision Contribution made under this schedule has not been applied in accordance with paragraph 1.1 of this part of this schedule by the tenth anniversary of that payment then any unspent sums shall be repaid to the Applicant forthwith whether or not requested by the Applicant and the Applicant shall be entitled to request and promptly receive from LBC at any time after the relevant anniversary full details and supporting evidence of how sums paid by the Applicant under this schedule have been applied.

SCHEDULE 3

1 Future Management of Wigmore Valley Park

1.1 The Applicant covenants with LBC:

- 1.1.1 to use best endeavours to establish the Wigmore Valley Park Community Trust no later than the date that the Replacement Land has been laid out and made ready for public use pursuant to a scheme submitted in accordance with article 35(1) of the Development Consent Order (failing which to do so as soon as practicable thereafter) and to do so in accordance with paragraph 1.2 as regards the membership of the Wigmore Valley Park Community Trust;
- 1.1.2 to act as the secretariat to the Wigmore Valley Park Community Trust as regards its responsibilities to manage Wigmore Valley Park once the Wigmore Valley Park Community Trust Operational Management Plan has been approved.

1.2 Members of the Wigmore Valley Park Community Trust shall comprise a minimum of;

- 1.2.1 1 LBC councillor invited by LBC;
- 1.2.2 1 director from the Applicant; and
- 1.2.3 two members of the local community who have been invited by LBC to become members of the Community Trust.

1.3 A Wigmore Valley Park Community Trust Operational Management Plan will be prepared by the Applicant and submitted to LBC for its approval (and for the avoidance of doubt a refusal to give such approval shall constitute a dispute) and must include inter alia provisions for the ongoing maintenance and management of Wigmore Valley Park, provisions to the effect that the Wigmore Valley Park Community Trust must comply with all relevant requirements in the Development Consent Order insofar as they relate to the management and maintenance of Wigmore Valley Park and arrangements for the governance of the Wigmore Valley Park Community Trust, including its terms of reference.

1.4 The Wigmore Valley Park Community Trust Operational Management Plan must be submitted to LBC for their approval before the Replacement Land has been laid out and made ready for public use pursuant to a scheme submitted in accordance with article 35(1) of the Development Consent Order.

1.5 Subject to paragraph 1.7 LBC agrees to grant a leasehold interest in Wigmore Valley Park (including for the avoidance of doubt the Replacement Land) to the Wigmore Valley Park Community Trust for a term of at least 99 years (subject to the Wigmore Valley Park Community Trust agreeing to such grant at the relevant time) once the Replacement Land has been laid out and made ready for public use pursuant to a scheme submitted in accordance with article 35(1) of the Development Consent Order.

1.6 LBC agrees to procure the Wigmore Valley Park Community Trust's agreement to manage Wigmore Valley Park in accordance with the Wigmore Valley Park Community Trust Operational Management Plan as a condition of any grant under paragraph 1.5.

- 1.7 If at the time LBC would be obligated to grant a leasehold interest in Wigmore Valley Park under paragraph 1.5 the Applicant is the proprietor of a leasehold interest in all of Wigmore Valley Park with at least 100 years remaining then the Applicant will grant a sub lease of that land to the Wigmore Valley Park Community Trust (if the said Trust is willing to accept it) for at least 99 years such sub lease to be subject to an obligation on the said trust to manage Wigmore Valley Park in accordance with the Wigmore Valley Park Operational Management Plan.
- 1.8 The Applicant and LBC covenant not to deal with the land comprising Wigmore Valley Park in such a way that would or is likely to frustrate the obligations in this Schedule.
- 1.9 The Applicant agrees to pay the sum of £250,000 to the Wigmore Valley Park Community Trust on an annual basis with the first payment being due when the Replacement Land has been laid out and made ready for public use pursuant to a scheme submitted in accordance with article 35(1) of the Development Consent Order or when the Wigmore Valley Park Community Trust has been established and Wigmore Valley Park has been leased to it under the provisions of this schedule (if later).

SCHEDULE 4

1 Employment and Training Strategy

- 1.1 Following service of the notice referred to in article 44(1) of the Development Consent Order, the Applicant and LLAOL covenants with the Councils to carry out its respective obligations and operate the Authorised Development in accordance with the Employment and Training Strategy [Application Document Reference: TR020001/APP/7.05] in the form appended at **Appendix 4** and to use reasonable endeavours to meet its goals.

SCHEDULE 5

1 Green Controlled Growth – Funding Elements

- 1.1 The Applicant covenants to make annual payments to those of the Councils which are members of ESG and/or a Technical Panel according to the table in this Schedule (the "Table") to assist them in meeting their obligations arising in relation to the ESG (or any successor body) and any related Technical Panel on account of the Authorised Development on the basis that doing so imposes on them additional cost burdens over and above their general duties and responsibilities and in particular discharging the obligations mentioned in the Table and any other responsibilities arising from their responsibilities on the ESG and/or a Technical Panel.
- 1.2 The payments shall be made annually, the first payment being due on the establishment of the ESG under requirement 19 of the Development Consent Order.
- 1.3 The payments made under this Schedule shall be applied by the relevant Councils for the purposes described in this Schedule and for no other purposes.
- 1.4 Should the payments made to those of the Councils who are a part of ESG and/or a Technical Panel in accordance with this Schedule 5 be exhausted the relevant Council may submit a detailed and reasoned written request to the Applicant to claim any additional costs over and above the amount paid according to the Table where the work is reasonably incurred in relation to time spent on ESG and/or Technical Panel related work and following approval of the request by the Applicant (which approval shall not be unreasonably withheld or delayed), the Applicant shall pay the additional costs to the relevant Council within 25 Business Days of the relevant claim.
- 1.5 No payments or further payments shall be due from the Applicant under this schedule to the extent that equivalent payments to serve the same purpose as those payable under this schedule are required to be made by the Applicant directly to the ESG as a corporate entity capable of receiving them.

Table

ESG	£2,500 per year per Council (3 days per year to cover involvement at a single annual ESG meeting, inclusive of prep time)
Technical Panel	£5,000 per year per Council (7 days per year to cover attendance at public meeting, review of monitoring data, reporting, and if necessary, attendance at a single meeting)

SCHEDULE 6

1 Prospect House Day Nursery

- 1.1 The Applicant covenants with LBC that it will commission an assessment by a firm of consultants with the relevant expertise of capacity requirements in respect of nursery place provision ("the Assessment") to ascertain whether it is necessary to replace in whole or part capacity that would be lost on account of the closure of the Prospect House Day Nursery, 140 Prospect Way, (the "Nursery") on account of the Authorised Development.
- 1.2 The Assessment will be carried out at least eighteen months before the Applicant anticipates demolishing the building currently occupied by the Nursery (the "Nursery Building") for the purposes of the Authorised Development.
- 1.3 A draft copy of the Assessment will be provided to LBC for comment and the Applicant and the appointed consultant will have regard to any comments made by LBC within 21 days of receipt in finalising the Assessment, a copy of which will be provided to LBC.
- 1.4 If the Assessment concludes that there is a need for nursery places to be provided on account of the closure of the Nursery on account of the Authorised Development, then the Applicant covenants with LBC that it will:
 - 1.4.1 take appropriate and reasonable steps to ensure that the Nursery is re-provided in an alternative location to meet the identified need; or
 - 1.4.2 take such alternative steps in response to the need as have been approved by LBC.
- 1.5 The Applicant shall not be obliged to take any steps under this schedule to the extent that such steps or such re-provision is provided for under the Compensation Code.
- 1.6 The Applicant shall not demolish the Nursery Building unless it has taken such steps as are required under paragraph 1.4 unless such steps fail to be taken after the demolition has taken place.

SCHEDULE 7

1 Compensation Policies

- 1.1 The Applicant covenants with the Councils to comply with and implement the Compensation Policies, Measures and Community First document [Application Document Reference: TR020001/APP/7.10] in the form appended at **Appendix 5**.

SCHEDULE 8

1 Community Fund

- 1.1 The Applicant and LLAOL covenant with the Councils that;
- 1.2 Following service of the notice referred to in article 44(1) of the DCO, LLAOL shall continue to operate and maintain the Community Fund in the following manner:
 - 1.2.1 by retaining the Community Fund in an interest-bearing bank account;
 - 1.2.2 by retaining the Independent Body to administer the Community Fund in accordance with the objectives in respect of the Community Fund as approved by LBC or any subsequent approval of the said funds objective approved by LBC;
 - 1.2.3 By 31 January in each year, LLAOL shall pay into the said bank account for the Community Fund a minimum of £100,000 (one hundred thousand pounds) and shall provide LBC with evidence of the deposit of such sum in the bank account on or before 1 March in each relevant year and for the avoidance of doubt these annual payments shall be in addition to any sums received by LLAOL by way of payment under any sanctions imposed on airline operators for failure to act in accordance with noise, track-keeping or other operating requirements at the airport pursuant to the ANMP;
 - 1.2.4 LLAOL shall publicise the availability of the Community Fund to communities in the Local Area;
 - 1.2.5 Any sums received by LLAOL from airlines under the Track Violation Penalty System shall be paid by LLAOL into the Community Fund; and
 - 1.2.6 Any sums received by LLAOL from airlines under the Departure Noise Violation Fine System shall be paid by LLAOL into the Community Fund.
- 1.3 In circumstances where LLAOL (as the current operator of the Airport) is no longer the operator of the Airport the Applicant will procure that the obligations to which LLAOL is subject under this agreement are met by any future operator of the Airport.

SCHEDULE 9

1 Design Review

- 1.1 LBC covenants with the Applicant that it will establish and appoint a Design Review Panel in accordance with the Design Principles [Application Document Reference: TR020001/APP/7.09].
- 1.2 The Applicant covenants with LBC that it will meet the reasonable costs of LBC commissioning and participating in a Design Review Panel.
- 1.3 The Applicant covenants with LBC to make payments as required under this Schedule within 25 Business Days of receipt of a detailed invoice for the costs in question.

SCHEDULE 10

1 Councils' Obligations

1.1 Registration

- 1.1.1 This Deed shall be registered by each of the relevant Councils promptly after the date of this Deed as a local land charge in the relevant local land charges registers.
- 1.1.2 Following the performance and satisfaction of all the obligations contained in this Deed, the relevant Councils shall forthwith effect the cancellation of all entries made in the register of local land charges in respect of this Deed.

Executed as a deed by)
LONDON LUTON AIRPORT LIMITED acting)
by , a director)
in the presence of:) Director

Witness Signature

Witness Name

(block capitals)

Witness Address

Executed as a deed by)
LONDON LUTON AIRPORT OPERATIONS LIMITED acting
by ANDREW MAXWELL, a director)
in the presence of:) Director

Witness Signature

Witness Name CHELO AGUIAR

(block capitals)

Witness Address LONDON LUTON AIRPORT OPS LTD

PERLVAH HOUSE, PERLVAH WAY

LUTON, BEDS, LU2 9NU

Executed as a deed by)
LUTON BOROUGH COUNCIL acting)
by)
in the presence of:) Director

Witness Signature

Witness Name

(block capitals)

Witness Address

Executed as a deed by)
LONDON LUTON AIRPORT LIMITED acting)
by NICK PHILLIPS, a director)
in the presence of:)

Director

Witness Signature

Witness Name
(block capitals)
Witness Address

Richard de Lani
Director Arup
8 Fitzroy St
London W1T

Executed as a deed by)
LONDON LUTON AIRPORT OPERATIONS LIMITED acting.....)
by , a director)
in the presence of:) Director

Witness Signature

Witness Name
(block capitals)
Witness Address

Executed as a deed by)
LUTON BOROUGH COUNCIL acting)
by)
in the presence of:) Director

Witness Signature

Witness Name
(block capitals)
Witness Address

Executed as a deed by)
LONDON LUTON AIRPORT LIMITED acting)
by , a director)
in the presence of:) Director

Witness Signature

Witness Name

(block capitals)

Witness Address

.....

.....

Executed as a deed by)
LONDON LUTON AIRPORT OPERATIONS LIMITED acting.....)
by , a director)
in the presence of:) Director

Witness Signature

Witness Name

(block capitals)

Witness Address

.....

.....

The Common Seal of
~~Executed as a deed by~~ *uses hereunder*
LUTON BOROUGH COUNCIL ~~acting~~)
~~by~~ *affixed* in the presence of)
in the presence of:) Director

Witness Signature

Witness Name

(block capitals)

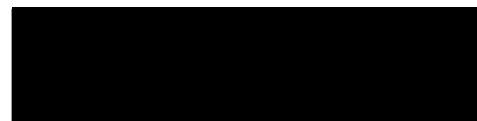
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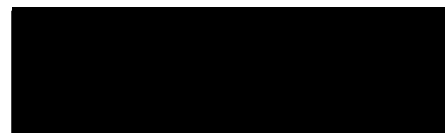
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2/277 m.b)
7412

Duty Authorised Signatory



Duty Authorised Signatory



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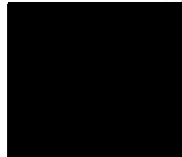
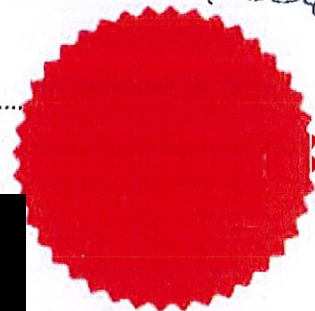
SSSS/2024

HERTFORDSHIRE COUNTY COUNCIL acting)

by ~~a director~~)

in the presence of:

~~Director~~



Damian Ogbonnaya
Assistant Chief Legal Officer

Witness Signature

Witness Name

(block capitals)

Witness Address

.....

.....

Executed as a deed by)
NORTH HERTFORDSHIRE DISTRICT COUNCIL)
in the presence of:)

.....

Witness Signature

Witness Name

(block capitals)

Witness Address

.....

Security agent)
ROYAL BANK OF)

SCOTLAND acting)

by a director)

in the presence of:)

Director

Witness Signature

Witness Name

(block capitals)

Witness Address

.....

.....

Executed as a deed by

HERTFORDSHIRE COUNTY COUNCIL acting)
by)
in the presence of: , a director) Director

Witness Signature

Witness Name
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Witness Address

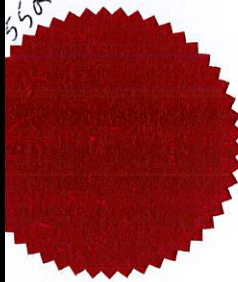
Executed as a deed by (UNDER THE COMMON) SEAL OF
NORTH HERTFORDSHIRE DISTRICT COUNCIL)
in the presence of:)

Witness Signature

Witness Name
(block capitals)
Witness Address

Daisy Authorised Officer

559



Security agent
ROYAL BANK OF
SCOTLAND acting
by)
in the presence of: , a director) Director

Witness Signature

Witness Name
(block capitals)
Witness Address

Executed as a deed by)
CENTRAL BEDFORDSHIRE COUNCIL acting)
by)
in the presence of:) Director

Witness Signature

Witness Name

(block capitals)

Witness Address

Executed as a deed by COMMON SEAL OF
DACORUM BOROUGH COUNCIL acting)
by) a director)
in the presence of:) Director

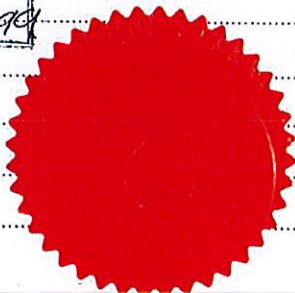
Witness Signature

Witness Name

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Witness Address

BOOK 10
ENTRY 11099



AUTHORISED SIGNATORY

Mark Brookes
Assistant Director
Legal and Democratic
Services

AUTHORISED SIGNATORY

NARGIS SULTAN

Legally Qualified Person

THE COMMON SEAL OF

Executed as a deed by
CENTRAL BEDFORDSHIRE COUNCIL acting
by WQS OFF (XCL)
in the presence of:

Authorised signatory

Witness Signature

Witness Name
(block capitals)
Witness Address



Executed as a deed by
DACORUM BOROUGH COUNCIL acting
by , a director
in the presence of:

Director

Witness Signature

Witness Name
(block capitals)
Witness Address

Executed as a deed by

HERTFORDSHIRE COUNTY COUNCIL acting)

by , a director)

in the presence of:

Director

Witness Signature

Witness Name

(block capitals)

Witness Address

Executed as a deed by

NORTH HERTFORDSHIRE DISTRICT COUNCIL)

in the presence of:

Witness Signature

Witness Name

(block capitals)

Witness Address

Security agent

ROYAL BANK OF

SCOTLAND acting)

by

in the presence of:

, a director)

Director

Witness Signature

Witness Name

(block capitals)

Witness Address

SARAH SULTAN

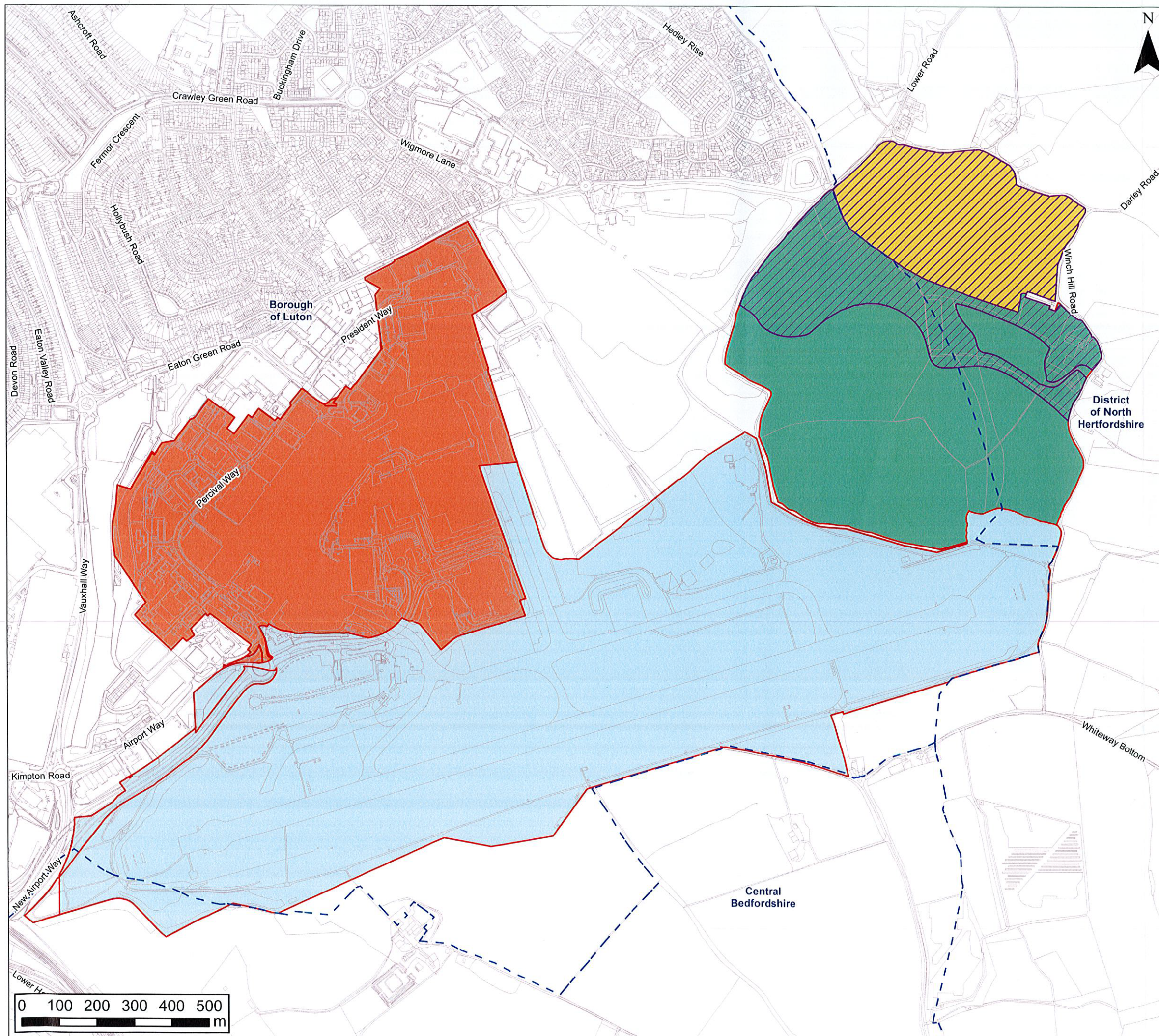
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LONDON

E11 3HE

NAVEED RANA

APPENDIX 1
SITE PLANS



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KEY

- Local Authority Boundary
- Part of Title BD147909
- Extent of Title BD180578
- Extent of Title BD200841
- Replacement Land - Extent of Title HD583959
- Replacement Land - Part of title BD147909

Section 106 agreement	RC	BS	SA	04/2023	P01.1
Revision History	Drawn	Checked	Approved	Date	Rev.

CLIENT:

Luton Rising Our airport. Our community. Our planet.

Luton Rising
Hart House Business Centre
Kimpton Road, Luton, LU2 0LA
www.lutonrising.org.uk

London Luton Airport Expansion Development Consent

Drawing Title: Freehold Site Plan
Sheet 1 of 2

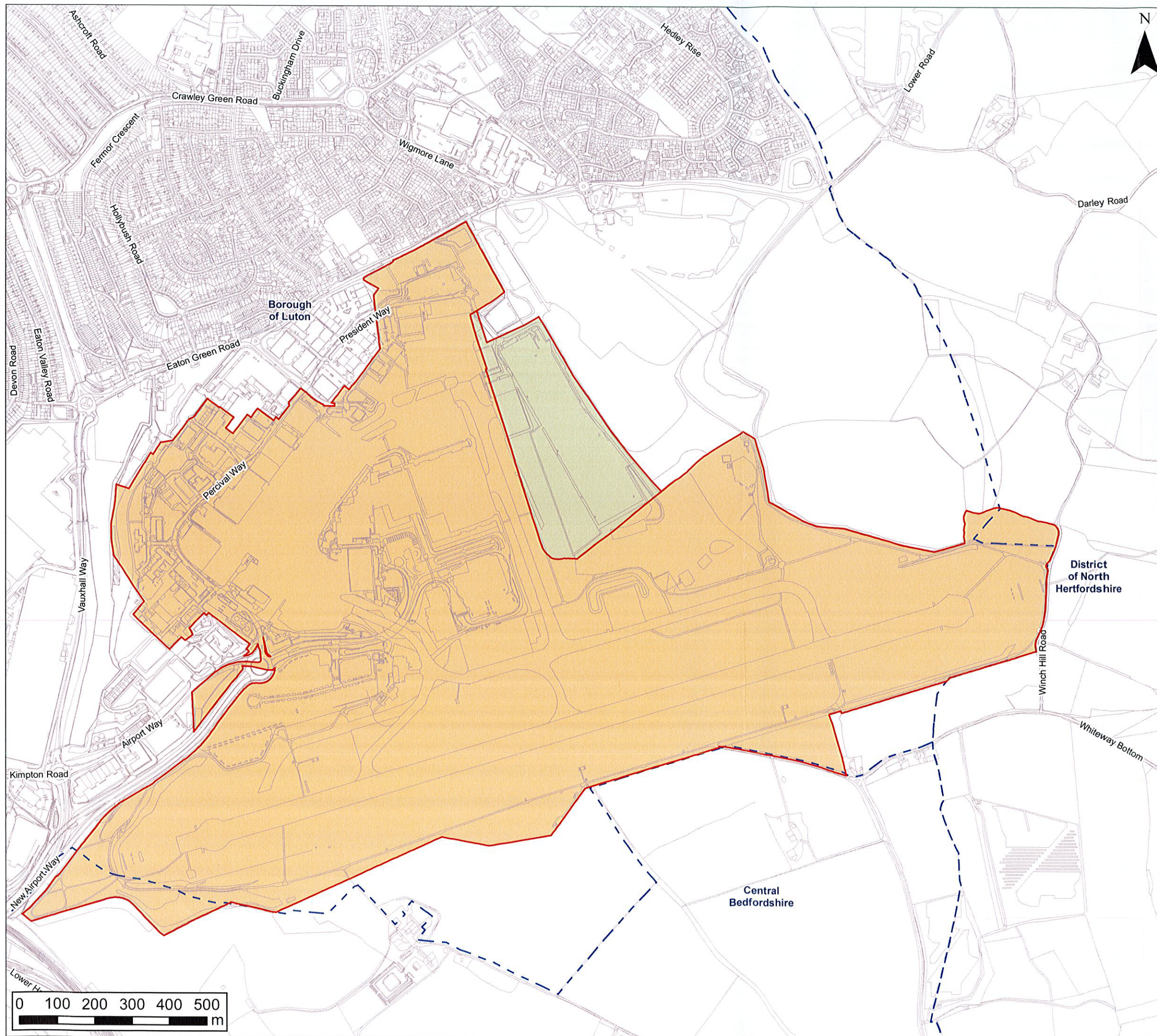
Purpose of issue: Section 106 Agreement

Drawn	Checked	Approved	Date	Scale	Size
R.Chauhan	B.Smith	S.Adama	01/24	1:10,000	A3

DCO Application Ref.	APFP Regulation	DCO Document Ref.
TR020001	n/a	TR020001/APP/8.167

Drawing Number	Revision
LLADCO-3C-WSP-WHS-GEN-IM-IM-0002	P01.1

Project - Phase - Originator - Asset/Zone - Sub Asset - Type - Discp. - Number



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KEY

- Local Authority Boundary
- Extent of Title BD206048
- Extent of Title BD216008

Section 106 agreement	RC	BS	04/2023	P01.1
Revision History	Drawn	Checked	Approved	Date

London Luton Airport Expansion Development Consent Order

Drawing Title: Leasehold Site Plan Sheet 2 of 2

Purpose of issue: Section 106 Agreement

Drawn	Checked	Approved	Date	Scale	Size
R. Chauhan	B. Smith	S. Adama	01/24	1:10,000	A3

DCO Application Ref.	APFP Regulation	DCO Document Ref.
TR020001	n/a	TR020001/APP/8.167

Drawing Number: LLADCO-3C-WSP-WHS-GEN-IM-IM-0002

Revision: P01.1

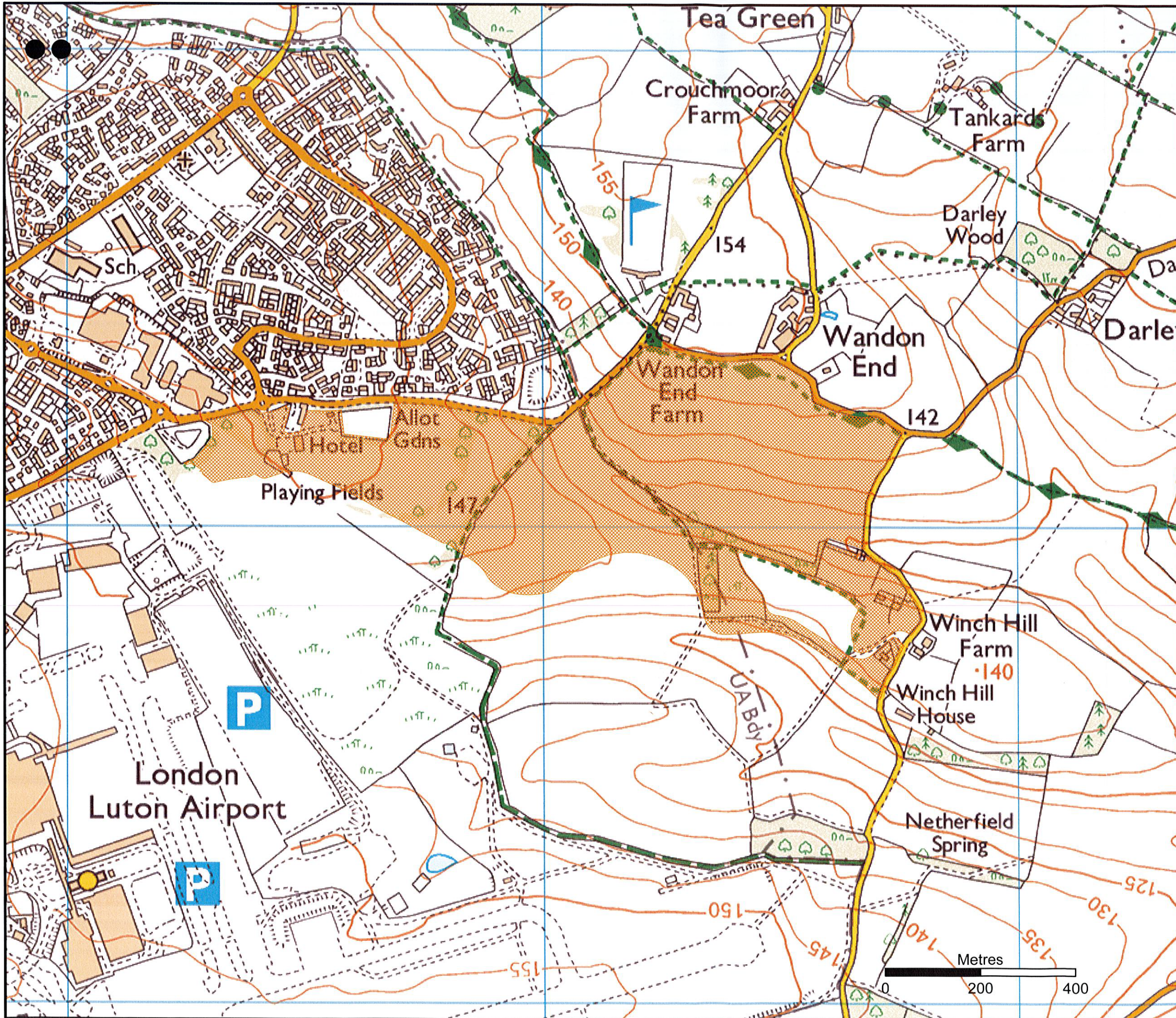
Project - Phase - Originator - Asset/Zone - Sub Asset - Type - Discp. - Number

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Luton Rising
Hart House Business Centre
Kimpton Road, Luton, LU2 0LA
www.lutonrising.org.uk

APPENDIX 2
EXISTING WIGMORE VALLEY PARK

APPENDIX 3
PROPOSED WIGMORE VALLEY PARK

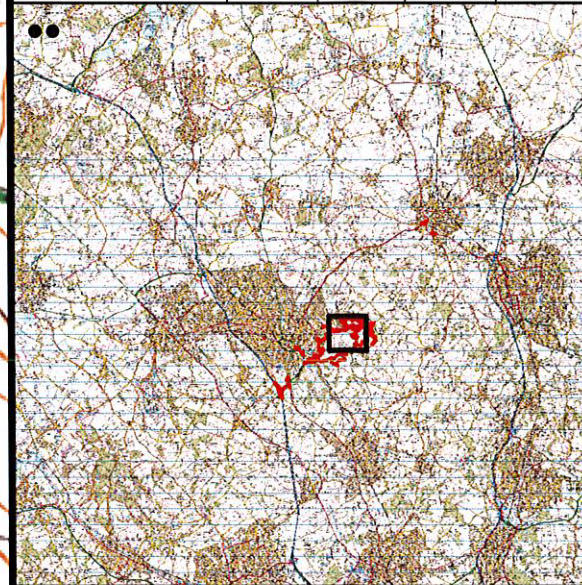


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All structure positions are indicative. The proposed works will be subject to detailed design development. The changes will be within limits of deviation specified in the Development Consent Order.

Legend

 Proposed Wigmore Valley Park

Additional Submissions - Deadline 9	AB	CP	CS	30/01/24	P01
Revision History	Drawn	Checked	Approved	Date	Rev.



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Kimpton Road, Luton, LU2 0LA
www.lutonrising.org.uk

**London Luton Airport Expansion
Development Consent Order**

Drawing Title
**Proposed Wigmore Valley
- Section 106 Agreement**

Purpose of issue					
Additional submissions - Deadline 9			S2		
Drawn	Checked	Approved	Date	Scale	Size
AB	TG	CS	30/01/24	1:7,500	A3
DCO Application Ref. TR020001		APFP Regulation N/A	DCO Document Ref. TR020001/APP/8.167		
Drawing Number LLADCO-3C-ARP-00-00-DR-YE-0910				Revision P01	
Project - Phase - Originator - Asset/Zone - Sub Asset - Type - Discp. - Number					

APPENDIX 4
EMPLOYMENT, SKILLS AND TRAINING STRATEGY

January 2024

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 7 Other Documents

7.05 Employment and Training Strategy

Application Document Ref: TR020001/APP/7.05

APFP Regulation 5(2)(q)

London Luton Airport Expansion Development Consent Order

**The Planning Act 2008****The Infrastructure Planning (Applications: Prescribed Forms and Procedure)
Regulations 2009****London Luton Airport Expansion Development Consent
Order 202x****7.05 EMPLOYMENT AND TRAINING STRATEGY**

Regulation number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	TR020001
Document Reference:	TR020001/APP/7.05
Author:	Luton Rising

Version	Date	Status of Version
Issue 1	February 2023	Application issue
Revision 1	January 2024	Additional submission – Deadline 7
Revision 2	January 2024	Additional Submission – Deadline 8

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EXECUTIVE SUMMARY

Employment and Training Strategy

Luton Rising is the trading name of London Luton Airport Limited and owner of London Luton Airport (the Applicant). Luton Rising is a business and social enterprise owned by a sole shareholder, Luton Borough Council, for community benefit. Luton Rising is at the heart of a movement for positive change in the Luton community.

Luton Airport is a major employer for Luton and the surrounding counties, offering jobs ranging from working for the airlines and the airport itself, through to working in shops and restaurants serving passengers. Jobs at the airport tend to be well paid, with an average wage that's notably higher than the national average.

The proposed expansion will support 4,200 new jobs directly at the airport (compared to jobs in 2019) and thousands more through its supply chain and during construction.

Given that Luton and the surrounding areas (Bedford Borough Council, Central Bedfordshire Council, Buckinghamshire Unitary Authority, Milton Keynes, and Hertfordshire County Council) have many pockets of high and persistent deprivation, the creation of new jobs can open windows of opportunity for areas that need it most. Yet people in those areas will not get those jobs if they lack the necessary skills. This strategy is designed to address that.

What are the goals for the workforce and workplace?

The Employment and Training Strategy (ETS) intends to help shape a brighter future for local people, create quality careers, and make the airport an inclusive and aspirational place to work. Luton Rising, the airport operator, and a new Airport Employers Community Forum (AECF) will:

- a. Invest in existing institutions and programmes to help local residents¹ gain the skills needed to access jobs created through the expansion, engaging with existing education institutions and local training providers.
- b. Help improve the accessibility of jobs at the airport, with the operator seeking to engage on travel planning issues with employers at the airport where appropriate (alongside the **Surface Access Strategy [TR020001/APP/7.12]**).
- c. Engage with employers at the airport to encourage high standards for wages, diversity and inclusion, employee wellbeing, and supporting local employment.
- d. Expand outreach into the local community through engagement with community leaders and schools, so residents and students are aware of opportunities at the airport.
- e. Support existing workers with upskilling and career advancement, with a focus on lifelong learning.
- f. Use foresight so the airport and its workforce are prepared for the future of aviation and can adapt alongside changing technology.

¹ Local residents refer to those living within the defined ETS study area

- g. Work with stakeholders including further education (FE) colleges, higher education (HE) institutions, and local charities and community groups to shape and deliver on these goals and initiatives.

The ETS sets out in greater detail the strengths and needs of the local area around skills and training, the job opportunities expected to be created through expansion, and the goals and actions proposed to prepare the community to take advantage of these opportunities.

1 INTRODUCTION

1.1 Introduction to the scheme

- 1.1.1 This application is made by Luton Rising (a trading name of London Luton Airport Limited), owners of London Luton Airport (the Applicant). Luton Rising is a business and social enterprise owned by a sole shareholder, Luton Borough Council, for community benefit. Luton Rising is at the heart of a movement for positive change in the Luton community. The Applicant seeks to make the best use of the existing runway at London Luton Airport (the airport) by improving the existing terminal and airport infrastructure and constructing a new terminal and associated infrastructure to increase the number of flights and passengers the airport can handle.
- 1.1.2 On 1 December 2021, the local planning authority (Luton Borough Council) (LBC) resolved to grant permission for the current airport operator, London Luton Airport Operations Limited (LLAOL), to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa. Since then, the application has been called-in and referred to the Secretary of State for determination instead of being dealt with by the local planning authority. The inquiry to consider the called-in application opened on Tuesday 27 September 2022 and ran until 18 November 2022.
- 1.1.3 The Secretary of State granted permission for the 19 mppa planning application in October 2023. As a result, this Employment and Training Strategy will supersede the incumbent Employment Skills and Training Plan but does reflect the previous aims and visions within the previous plan, where appropriate.
- 1.1.4 The Applicant has committed to ensuring that key priorities within the incumbent Employment Skills and Training Plan are included within this Employment and Training Strategy. This includes the incorporation of the Local Procurement Protocol (LPP), which is outlined in further detail in Appendix A. The Local Procurement Protocol means the procurement procedure through which businesses within the ETS study area are given the opportunity to bid/tender for the provision of goods and services to the Proposed Development.
- 1.1.5 All of the assessment work to date has been undertaken using a "baseline" of 18 mppa. For the purposes of assessment three assessment phases are considered with each phase delivered to meet the forecast passenger demand. In practice, the Proposed Development will be delivered in undefined increments that appropriately respond to demand over time.
- 1.1.6 The Proposed Development builds on the current operational airport with the construction of a new passenger terminal and additional aircraft stands to the north east of the runway, this will take the overall passenger capacity from 19 mppa to 32 mppa.
- 1.1.7 In addition to the above and to support the initial increase in demand, the existing infrastructure and supporting facilities will be improved in line with the short-term requirements for additional capacity. Key elements of the Proposed Development include:

- a. Extension and remodelling of the existing passenger terminal (Terminal 1) to increase the capacity;
- b. New passenger terminal building and boarding piers (Terminal 2);
- c. Earthworks to create an extension to the current airfield platform; the vast majority of material for these earthworks would be generated on site;
- d. Airside facilities including new taxiways and aprons, together with relocated engine run-up bay and fire training facility;
- e. Landside facilities, including buildings which support the operational, energy and servicing needs of the airport;
- f. Enhancement of the existing surface access network, including a new dual carriageway road accessed via a new junction on the existing New Airport Way (A1081) to the new passenger terminal along with the provision of forecourt and car parking facilities;
- g. Extension of the Luton Direct Air to Rail Transit (Luton DART) with a station serving the new passenger terminal;
- h. Landscape and ecological improvements, including the replacement of existing open space; and
- i. Further infrastructure enhancements and initiatives to support the target of achieving zero emission ground operations by 2040², with interventions to support carbon neutrality being delivered sooner including facilities for greater public transport usage, improved thermal efficiency, electric vehicle charging, on-site energy generation and storage, new aircraft fuel pipeline connection and storage facilities, and sustainable surface and foul water management installations.

1.1.8 The full project description is provided in Chapter 4 of the **Environmental Statement [TR020001/APP/5.01]**.

1.1.9 The assessment phases for the development comprise:

- a. Assessment Phase 1 – a core case of 21.5 mppa by 2027.
- b. Assessment Phase 2a – a core case of 27 mppa by 2039 when T2 opens.
- c. Assessment Phase 2b – a core case of 32 mppa by 2043 when T2 is fully built out.

1.2 Introduction to the Employment and Training Strategy (ETS)

1.2.1 This Employment and Training Strategy (ETS) has been prepared to support the application for development consent for expanding the airport. It was preceded by an Outline Employment and Training Strategy (OETS) (Ref 1.1) prepared as part of the statutory consultation material consulted upon during Autumn 2019 as well as the Draft Employment and Training Strategy (Ref 1.2) published for consultation in Spring 2022.

² This is a Government target, for which the precise definition will be subject to further consultation following the Jet Zero Strategy, and which will require further mitigations beyond those secured under the DCO.

- 1.2.2 This ETS includes the following five sections:
- a. Section 1: The purpose, scope and development of the ETS.
 - b. Section 2: Evidence of the key opportunities and challenges of meeting the employment and skills requirement of the Proposed Development.
 - c. Section 3: Purpose and principles of the ETS.
 - d. Section 4: The proposed goals and initiatives to deliver the ETS.
 - e. Section 5: Summary of initiatives and proposed governance structures.
- 1.2.3 The key purpose of the ETS is to ensure that, as many of the jobs and economic opportunities generated by the Proposed Development as possible, go to the residents of Luton and the "ETS Study Area" (see 1.2.5 below) because they will have the skills and training required to do the jobs well and to help mitigate some of the other impacts on the ETS Study Area resulting from expansion. The ETS sets out how the Applicant and its strategic partners can maximise employment benefits of the expansion for the ETS Study Area through collaborative and good practice approaches to employment and training support for residents and businesses at the airport.
- 1.2.4 The ETS recognises that many of the jobs created by the Proposed Development will be within Luton, where the airport is located, including all directly created jobs at the airport and some indirect supply chain jobs and jobs induced by the additional spending power within the area. There will also be indirect and induced jobs created throughout the wider ETS Study Area. All of these opportunities can benefit both residents of Luton and residents of the wider ETS Study Area. This ETS explores the potential impact of the Proposed Development on employment and training and the associated opportunities and challenges in the whole ETS Study Area (see Figure 1.1).
- 1.2.5 The baseline data is based on the following ETS Study Area, defined as those areas with the greatest employment at the airport and those places that will gain the most economic and employment benefits from the Proposed Development. This is similar to the principal study area of 'Three Counties' area set out in the **Need Case [TR020001/APP/7.04]**.³
- a. Luton Borough Council
 - b. Bedford Borough Council
 - c. Central Bedfordshire Council
 - d. Buckinghamshire County Council (Unitary Authority)⁴
 - e. Milton Keynes Council

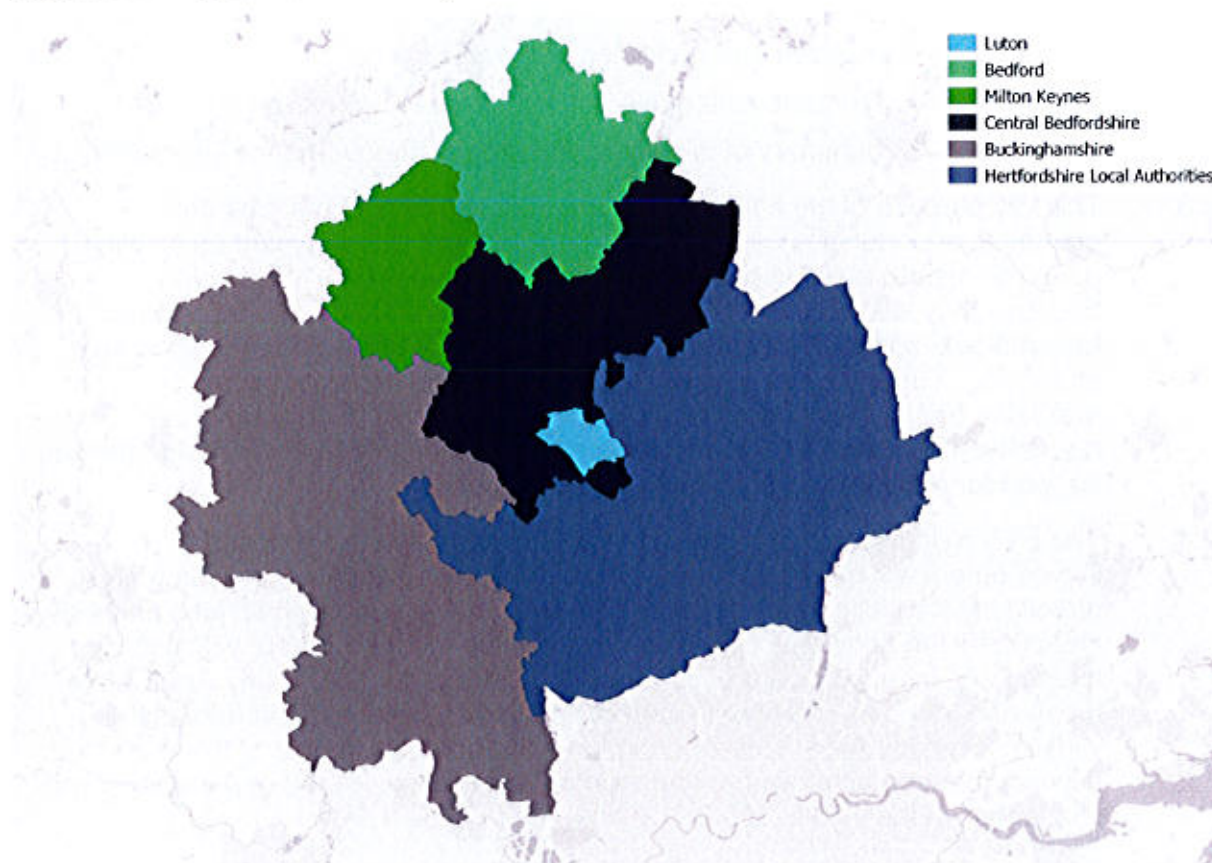
³ The ETS Study Area is based on where the employment impacts are most likely to be achieved across employment catchment, based on commuting patterns. This may differ from other defined study areas across the DCO, depending on their purpose and scope of impact.

⁴ Buckinghamshire became a new unitary authority in 2020. For data pre-2020, the unitary authority data is estimated using data from Aylesbury Vale, Chiltern, South Bucks and Wycombe, its former constituent district councils.

f. Hertfordshire County Council⁵

1.2.6 A map of the ETS Study Area is shown at Figure 1.1.

Figure 1.1: Map of the ETS Study Area⁶



1.3 Who will implement the Employment Training Strategy

- 1.3.1 The airport is wholly owned by Luton Rising (a trading name of London Luton Airport Limited). In turn, Luton Rising is wholly owned by LBC, hence the airport is the only major UK airport to be wholly publicly owned.
- 1.3.2 In 1998, Luton Rising 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 that LLAOL has complete responsibility for, and control over, the day-to-day running of the existing airport. This ownership and operational structure is shown in Figure 1.2.
- 1.3.3 As the airport's owner and the Applicant submitting the application for development consent, Luton Rising has a significant role to play in shaping the airport's long-term future. As the landlord of the airport, it is Luton Rising's

⁵ When county data was not available, data was combined from its constituent districts including Broxbourne, Dacorum, East Hertfordshire, Hertsmere, North Hertfordshire, St Albans, Stevenage, Three Rivers, Watford and Welwyn Hatfield.

⁶ Base map source: Ordnance Survey.

intention that those that operate the airport over the short and longer term must do so having full regard to all of the obligations that this DCO and particularly the ETS place on them in regarding the implementation of future growth.

- 1.3.4 Under the terms of the current concession, LLAOL will operate the airport until 2032. Any requirements or conditions set out through the DCO process for the delivery of the ETS, would be secured through a s106 agreement but delivered collaboratively between the Applicant and LLAOL.
- 1.3.5 Within this document therefore, when referring to the processes and requirements of the ETS, reference is made to the airport operator as well as the Applicant. As part of the development of these proposals, the Applicant has worked closely with LLAOL to understand how both parties can build upon the work undertaken to date to increase sustainability and ensure that the ETS is delivered successfully.

Figure 1.2: Ownership and management structure of the airport



1.4 Progress since the 2019 Outline Employment Training Strategy

- 1.4.1 Since the 2019 OETS, the Applicant has carefully considered the feedback provided in the statutory consultation. The ETS proposals have been reviewed and further stakeholder engagement has been conducted to develop the earlier outline ETS into a Draft ETS produced for consultation in 2022. The consultation feedback has been taken on board to produce this ETS for the application for development consent. A detailed summary of the consultation process can be found within the **Consultation Report [TR020001/APP/6.01]**.
- 1.4.2 The Applicant has continued to engage the Economics and Employment Working Group⁷ throughout the development of the ETS. The Working Group has met at key milestones in the Strategy's development, and it includes local government and wider stakeholders representing stakeholders across the ETS Study Area. Details regarding the dates and frequency of engagement can be found in the **Consultation Report [TR020001/APP/6.01]**. There are a number of key steps that were set out in the 2019 OETS which have been completed by the submission of the application for development consent. Table 1.1 below sets out the progress against those actions and the continued work on the ETS.

⁷ To support an inclusive and consultative DCO process, the consultant team has established an Economics and Employment Working Group with key stakeholders across the ETS Study Area.

Table 1.1: Summary of development of the ETS since the 2019 Outline ETS

2019 OETS actions	Activities undertaken to address the actions
Further engagement with key stakeholders	Consultations with the Economics and Employment Stakeholder Group and employment and training providers across the ETS Study Area to support refinement of the proposed interventions and governance of the ETS
Audit of current activity on site at the airport in relation to employment and skills development to build on existing good practice programmes	Researched long-term trends in employment and skills required for airport jobs and assessed good practice programmes to help address issues and refined the assessment based on any feedback from the airport operator and businesses at the airport
Audit of existing supply side activities within the education and skills sector, the providers and potential synergies across Luton and the ETS Study Area	Engaged with local councils, Local Enterprise Partnerships and employment and training providers to understand their opportunities and challenges in relation to the existing airport and Proposed Development, then used these insights to refine the proposed interventions and governance of the ETS
Assessment of the skills requirements to support both the construction and operational phases of the airport's development	Used Oxford Economics employment projections and forward-looking skills assessments to estimate jobs and skills requirements, refining the assessment based on any feedback from the airport operator and businesses at the airport
Investigation of good practice at other airports and major construction programmes	Researched good practice programmes that respond to similar challenges and opportunities as the Proposed Development, both during construction and operation, then refined proposed interventions based on any further findings from good practice programmes
Identification of the target area and key target groups	Confirmed ETS Study Area geography and identified target groups for the ETS through a rigorous baseline economic study of employment, skills and deprivation data, then added detail to the proposed target area or key target groups, based on feedback from this consultation
Definition of potential interventions and corresponding outputs and targets	In collaboration with other disciplines in planning the Proposed Development (such as Green Controlled Growth), developed proposed interventions, set out in this document, then refined the proposed interventions to reflect feedback from this consultation, and set corresponding outputs and targets (where appropriate)
Establishment of governance and monitoring arrangements	Developed proposed governance structures for consultation, then refined the proposed governance structures and set out monitoring arrangements

1.5 Feedback from the 2022 Consultation

1.5.1 The Proposed Development underwent a second Statutory Consultation between February and April 2022, feedback from this consultation was received from a range of stakeholders including the Host Authorities, Local Authorities, the airport operator, businesses in the airport as well as the general public. Responses from the consultation with regard to the ETS related to six topics as follows:

- a. Phasing of initiatives;
- b. Monitoring, accountability and targets;
- c. Distribution of benefits;
- d. Organisational structure;
- e. Approach to training provision; and
- f. Transport and accessibility.

1.5.2 The comments from the consultation have been taken into consideration and the ETS has been updated in line with the comments received where appropriate. A full summary of the response to the consultation can be found within the **Consultation Report [TR020001/APP/6.01]**.

2 THE OPPORTUNITY FOR EMPLOYMENT AND TRAINING

2.1 Employment and training strengths and gaps today

2.1.1 The ETS is based on a detailed review of the communities in the ETS Study Area and the contribution of the airport within the context of other local businesses. While analysis covers a wide range of topics and issues, some of the most important and pressing strengths and gaps are set out below.

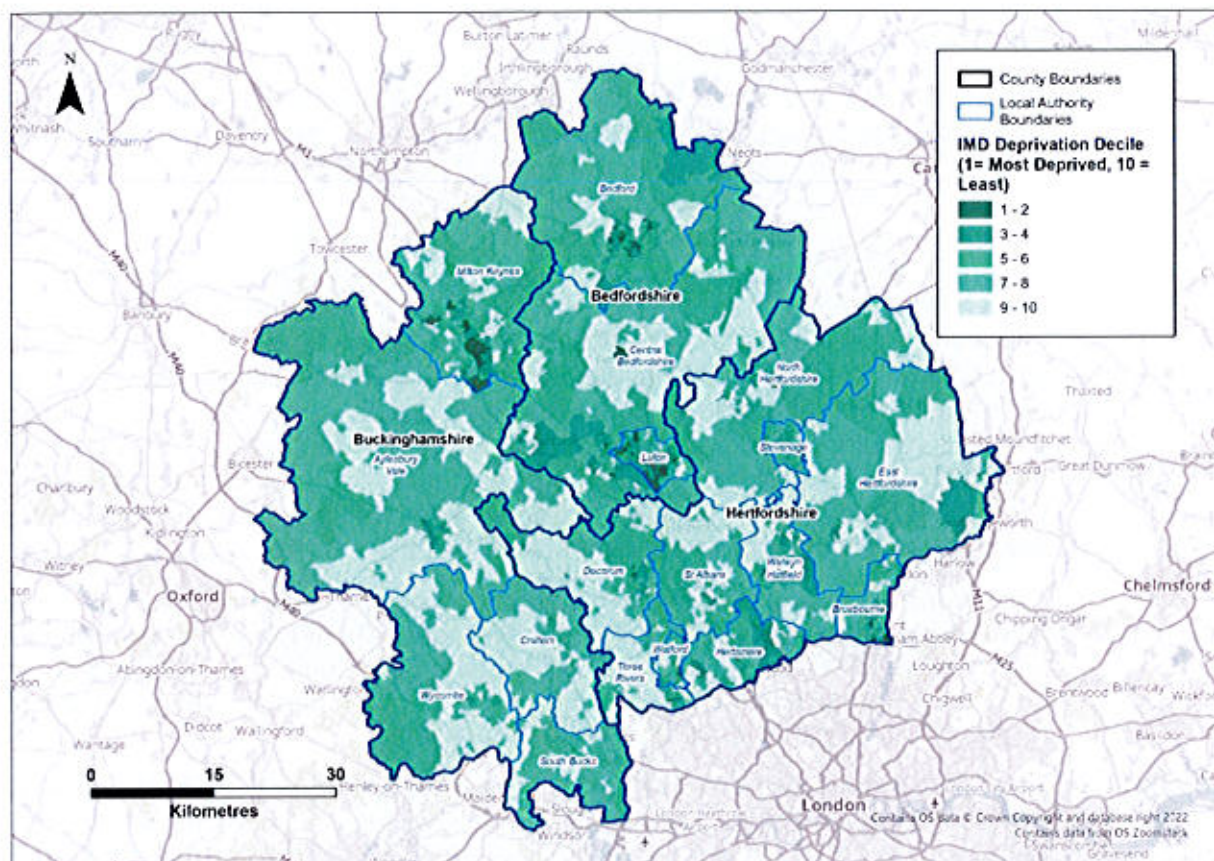
2.1.2 **Many jobs that are directly supported by the airport are well-paid.** The average wage of workers in jobs directly supported by the airport was estimated at £41,100, which is 34% above the national average of £30,700, and 27% above the average for the Borough of Luton (Ref 2.3). The airport supports jobs at various wage, skill and qualification levels (Ref 2.4). In a similar vein, generally across Luton, salaries for people who work in Luton Borough are higher than salaries of the people who live in Luton Borough (Ref 2.5), suggesting that the higher paid jobs in Luton Borough tend to be filled by people who commute in from further afield. Luton as a town offers great job opportunities, but the skills of Luton residents are not currently well matched to the skills required to take advantage of the opportunities in the town and at the airport. This ETS seeks to enable more residents – in Luton and across the wider ETS Study Area – to take opportunities for well-paid-jobs at the airport in line with the Local Skills Improvement Plan 2022-2026 (Ref 2.6).

Role of the ETS: The Proposed Development would create new jobs which pay well compared to regional and national averages. The ETS would support more local people to take on these jobs by providing opportunities to better match the skills of residents within the ETS Study Area, in Luton particularly, with the skills required to fill these jobs as they become available.

2.1.3 **Overall, Luton suffers from higher rates of deprivation than other parts of the ETS Study Area.** According to the Index of Multiple Deprivation 2019, Luton was the 52nd most deprived local authority out of 317 in England. For measures of education deprivation and income deprivation, it ranked even lower at 45th and 49th respectively. Within Luton there are pockets of deprivation. 27% of Luton's neighbourhoods (defined by Lower Super Output Areas, a standard statistical area used by the Office of National Statistics) are within the 20% most deprived LSOAs in the country (Ref 2.7), and 28% within the 20% most deprived for income. Some pockets of deprivation can be seen across the ETS Study Area. Specifically, there are higher levels of deprivation in urban areas such as Stevenage, Hemel Hempstead, Hatfield, Bletchley, Bedford and Letchworth, including employment deprivation as well as education, skills and training. Many of these areas have high transport costs for accessing areas with quality jobs, compounding the issue. Despite high quality FE colleges and universities in the area, there are still communities without access to the skills and training support they need to access good work. However, overall, the wider study area sees relatively lower levels of deprivation.

Role of the ETS: Provide a framework and programmes to connect the airport with local education, training institutions and community groups, ensuring all have access to the training required for gainful employment at the airport.

Figure 2.1: Map of overall deprivation



- 2.1.4 An overwhelming majority of the available “ready to work” workforce (those looking for work) in the ETS Study Area usually work in a “low-skilled” occupation.** Around 94% of the October 2020 Jobseekers Allowance (JSA) (Ref 2.8) claimants in the ETS Study Area have a usual occupation which is described as “low-skilled”. The highest proportions of claimants who have a usual occupation described as “low-skilled” reside in Hertfordshire, Central Bedfordshire, Buckinghamshire and Luton, suggesting that there are large parts of the resident population which could benefit from upskilling to gain employment, and progress in employment.

Role of the ETS: The Proposed Development would play a role in providing job opportunities for low-skilled workers, and the ETS would provide a strategy for upskilling the local workforce ahead of construction and operation through local employment and training activities, as well as initiatives to ensure skills readiness.

2.1.5 There is an opportunity through the Proposed Development for existing and future residents within the ETS Study Area to enter the workforce. Population growth is anticipated overall in the whole ETS Study Area, except in Luton. Looking at ONS projections, the population in the ETS Study Area is expected to grow by 5% between 2019 and 2040, with the highest growth rates in Bedford and Central Bedfordshire (+12%) but negative growth in Luton (-5%) (Ref 2.9). Areas like Central Bedfordshire had particularly low unemployment rates (just over 1%) pre-pandemic (January 2019 - December 2019), so population growth will be important for meeting the growing demand for new workers (Ref 2.10).

2.1.6 Wider demographic and labour force changes due to external economic factors including Brexit and an evolving economy has created a skills shortage in the local population highlighting the need to upskill the local population so that they are able to take advantage of employment opportunities (Ref 2.11).

Role of the ETS: The Proposed Development would provide employment opportunities for the growing population, and the ETS would ensure that local people are better able to access these jobs. The ETS also proposes forums for engagement with local councils to help coordinate plans for workforce growth.

2.1.7 There are areas of low skills and low qualifications across the ETS Study Area. Only 31% of Luton residents hold an NVQ4+ qualification compared to 42% on average across the whole ETS Study Area, where Bedford has the highest proportion of people with an NVQ4+ qualification (46%), with Buckinghamshire, Hertfordshire, and Milton Keynes also having similar proportions of the population with high qualification levels. Additionally, 10% have "no qualification" in Luton (7% in the ETS Study Area) and 18% have an "other qualification" (8% in the ETS Study Area) (Ref 2.12). There are also pockets across the ETS Study Area with similar profiles of lower skills, highlighting a need for upskilling targeted groups.

Role of the ETS: The ETS would provide a framework and leadership for bringing training opportunities to communities, working with local groups to ensure that local people know about new jobs from the Proposed Development and can access any training required for these jobs.

2.1.8 The ETS Study Area could see improvements in local jobs, skills and wages. Long-term unemployment is a challenge in the ETS Study Area, with Job Seeker's Allowance (JSA) claimants who are unemployed for over a year representing over 40% of claimants in Luton and over 30% in Bedford and Milton Keynes in October 2020 (Ref 2.13). Over 70% of residents in Hertfordshire, Central Bedfordshire and Buckinghamshire claiming JSA have been unemployed for up to six months. 'Sales and Services' and 'Elementary Occupations' make up the largest proportion of people receiving JSA.⁸ The

⁸ 'Elementary Occupations' refers to "occupations which require the knowledge and experience necessary to perform mostly routine tasks, often involving the use of simple hand-held tools and, in some cases, requiring a degree of physical effort. Most occupations in this major group do not require formal educational qualifications but will usually have an associated short period of formal experience-related training." Source: Office for National Statistics. 'ONS Standard Occupational Classification (SOC) Hierarchy.' https://onsdigital.github.io/dp-classification-tools/standard-occupational-classification/ONS_SOC_hierarchy_view.html

Covid-19 pandemic has significantly increased the number and proportion of JSA claimants with elementary occupations, and it has exacerbated a longer-term decline in retail employment.

Role of the ETS: Upskilling these long-term unemployed people (in terms of both soft and hard skills) would help them to get back to the job market. The ETS would bring together the people and organisations who can provide a wide range of skills that would be required across the construction and operation phases of the Proposed Development. Even during times of low unemployment, the ETS will focus on supporting deprived areas and people in long-term unemployment into work.

- 2.1.9 The airport draws in workers from a wide catchment area.** In 2011, only 57% of Luton residents worked in Luton and 40% of Central Bedfordshire residents worked in Central Bedfordshire, compared to 81% of Milton Keynes residents working in Milton Keynes and 71% of Bedford residents working in Bedford – the latter two areas showing greater alignment between local labour supply and demand (Ref 2.14). However, it should be noted that across the ETS Study Area, most workers live and work in the same local authority. There is some out-commuting in the area, with 16% of Luton residents commuting to Hertfordshire and 12% commuting to Central Bedfordshire, whilst 9% of Luton residents commute to London. Equally, 13% of those living in Central Bedfordshire commute to Luton and 19% to Hertfordshire.
- 2.1.10** *Role of the ETS:* The ETS would provide mechanisms to support residents in the study area to access the jobs at the airport by equipping more local people with the skills needed to work at the airport and through better outreach to local communities. The ETS would also engage with stakeholders who manage travel accessibility to the airport, to support viable commuting options for workers at the airport from across the ETS Study Area.
- 2.1.11 Employment in Luton is more at risk of automation (all or parts of the job being replaced by technology) than the ETS Study Area as a whole.** Looking at probability of automation by occupation (Ref 2.15), Luton has the highest risk of automation in the ETS Study Area given the lower skills occupation level on average (Ref 2.16). According to the ONS, areas around Luton including South Bedfordshire, Dacorum, Bedford and areas around Stevenage are at a higher risk of automation compared to other local authorities within the ETS Study Area. There is a threat to long term employment in many sectors from automation. Areas of employment at the airport that could be at particular risk include check-in or baggage drop (Ref 2.17).
- Role of the ETS:* Additional jobs will help replace those reduced or replaced by automation over time, and better use of automation can help workers focus on value-added aspects of their work, helping them to be more productive. The ETS would be forward-looking, helping employers and training providers adapt to changing technology requirements and supporting lifelong learning.
- 2.1.12 Apprenticeships starts and achievements (completing an apprenticeship) have been falling in the past five years.** Uptake of intermediate apprenticeships across the ETS Study Area have consistently fallen since 2015. While apprenticeships are important for creating new pathways into work, completion of level 2 intermediate apprenticeships within the ETS Study Area

(such as in construction building, domestic heating, construction civil engineering or plumbing and heating) have experienced a sharp decline over the past five years (Ref 2.18).

Role of the ETS: Both the construction and operation of the Proposed Development would create opportunities for apprenticeships. The ETS will provide the framework for active engagement between the employers at the airport and apprenticeship providers to support more completions by providing a structured approach to apprenticeship programmes and support for businesses providing apprenticeships.

- 2.1.13 **The biggest challenge for businesses in the ETS Study Area who cannot fill vacancies ('Hard-to-Fill Vacancies') is the lack of applicants with the required skills or necessary experience (Ref 2.19).** 35% of hard to fill vacancies in the ETS Study Area are due to a lack of applicants with the right skills, experience or qualifications. However, the proportion of those seeking work in the ETS Study Area who have a skilled occupation is low, at 1.7%, compared to an England average of 2%. This makes it harder for employers to find skilled workers.

Role of the ETS: New roles will create opportunities for the airport, employers, and local education training institutions to offer training to meet employer needs. The ETS creates a framework and relationships to support those parties to come together, prepare and implement a plan for training needs.

- 2.1.14 In addition to the strengths and challenges listed above, there are important learning institutions in the ETS Study Area which can create opportunities that work in tandem with the Proposed Development.

- 2.1.15 Local FE colleges provide courses relevant to airport job opportunities. Both Central Bedfordshire College and Barnfield College have campuses in Luton which provide courses up to HE level in areas relevant to the construction phase, such as Construction and Engineering, in addition to courses relevant to the ongoing operation of the airport, such as Accounting & Business and Hospitality & Catering. North Hertfordshire college has a specialist engineering and construction campus in Stevenage and there are proposals for a new Milton Keynes University Technical College to be created.

- 2.1.16 Local universities also provide relevant education opportunities. The University of Bedfordshire is based in Luton, providing both undergraduate and post graduate courses relevant to those wanting to work at an airport, including engineering and accountancy courses. A specific aviation focussed course, the Aviation and Airport Management BSc, makes use of its proximity to the airport to give hands-on experience. Other local universities, such as Cranfield University (with its aviation-related post-graduate courses and existing close ties with aviation), University of Hertfordshire and Buckinghamshire New University, have students who move on to work for major employers in aviation and at the airport in wide ranging roles from engineering to business.

- 2.1.17 Understanding the strengths and weaknesses of today's economy helps key stakeholders understand what would be required to meet the employment needs of the Proposed Development and meet future operational requirements.

More people would be needed to work in Luton and the neighbouring counties – and those people would require new and different skills. The key opportunities for future jobs and skills development are set out in the following sections.

2.2 Opportunities highlighted by stakeholders

2.2.1 Engagement with key education institutions and local training providers has been undertaken to identify training and employment initiatives already in place and highlight potential gaps. This has included interviews with universities and FE colleges in the ETS Study Area (further details are set out in the **Consultation Report [TR020001/APP/6.01]**), and has provided the following insights:

- a. Existing initiatives are limited and include “meet the buyer” events, collaboration with the Prince’s Trust to provide placements for local young people (the “Get into Airports” programme) and other ad hoc activities. Some businesses at the airport, such as several airlines, are more active in their engagement and collaboration with universities and colleges.
- b. There is a need for a centralised point of contact for education institutions to regularly engage and work together with the airport, including the numerous businesses operating at the airport, as the airport can be perceived by individuals as difficult to navigate.
- c. Developing tailored training programmes to respond to the needs of the Proposed Development will take time and extensive planning, and therefore early engagement and preparation is key.
- d. Placements, apprenticeships, T-levels (2-year courses offering a mix of classroom learning and on-the-job experience) and training opportunities are considered highly valuable by education institutions, as are guest speakers and site visits, which are key to inform and inspire students about potential careers at the airport.
- e. Local educational institutions and training providers can provide extensive support with recruitment to the airport and airport businesses, helping local people access employment opportunities created by the Proposed Development.
- f. It was suggested that the airport could sponsor research activities, providing further support to students and helping to establish the airport as an aspirational place to work.

2.2.2 The opportunities identified above have been taken into consideration when developing the initiatives outlined in Section 4 of this ETS.

2.3 Jobs created from the Proposed Development

2.3.1 The employment impacts of the Proposed Development have been assessed both for the construction and the operation of the airport (further information on the economic impact of the Proposed Development can be found in Chapter 11 of the **Environmental Statement [TR020001/APP/5.01]** and in the **Need Case**

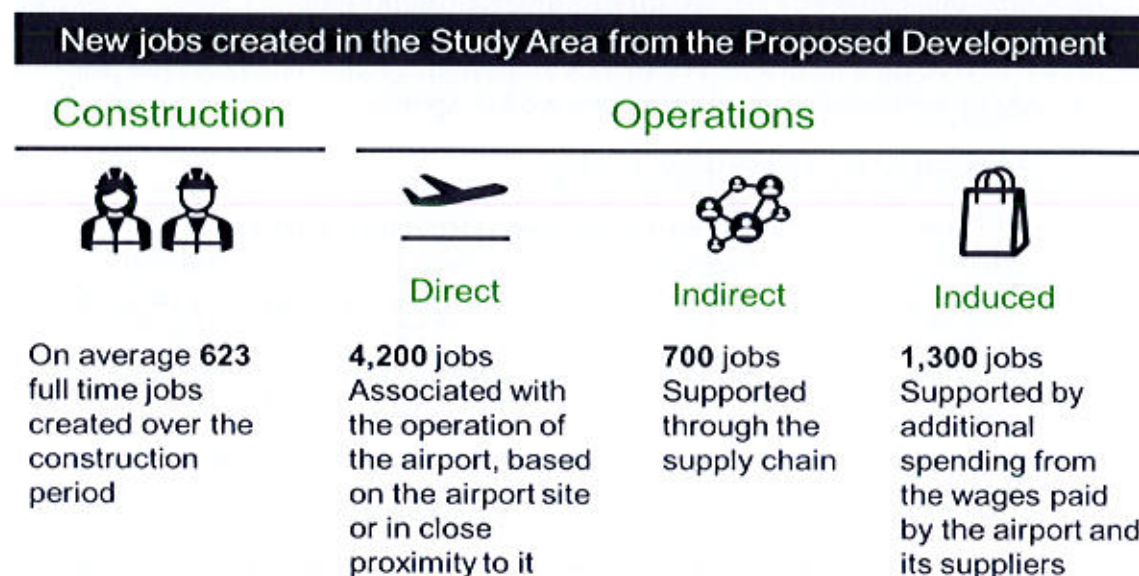
[TR020001/APP/7.04]). The works to deliver the Proposed Development will be presented with reference to two major elements:

- a. Works to facilitate the expansion of capacity in Terminal 1 in line with the demand forecasts contained in the application (i.e., a core case of 21.5 mppa but with the scope to accommodate up to 23 mppa with peak spreading).
- b. Works to build and operate Terminal 2, and any associated infrastructure, such that the airport can ultimately accommodate a maximum of 32 mppa across both terminals.

2.3.2 As outlined in Section 1.2 above, a significant number of jobs that are created by the Proposed Development will benefit residents in the ETS Study Area. These areas will benefit from both jobs created directly from the Proposed Development as well as indirect jobs created through the supply chain. Residents in the ETS Study Area will see further job creation from the additional spending power generated as a result of an increase in employment opportunities.

2.3.3 The following sections present first the job growth opportunities during construction, then during operation of the airport, and finally combined impacts of construction and operation. A summary of the job creation opportunities is presented below in Figure 2.2.

Figure 2.2: Jobs growth from the Proposed Development (compared to 2019 levels) by 32 mppa⁹



2.4 Opportunities in construction jobs

2.4.1 The **direct jobs during construction** – the employment supported by firms which are integral to the construction of the airport – would come in three

⁹ Operational jobs figure quoted for the three counties (Hertfordshire, Bedfordshire and Buckinghamshire) considered as the key focus of the ETS.

stages, noting that these phases are assessment phases and development may come forward differently:

- a. 2025 - 2027: There would be limited construction activity as the airport undertakes some incremental expansion to increase the capacity of Terminal 1, creating on average around 200 person years¹⁰ of employment per annum;
- b. 2033 - 2036: Most construction activity would occur during this period with the delivery of a new Terminal 2, creating up to 940 person years of employment per annum; and
- c. 2037 - 2040: This period would see a less intensive construction period as the capacity of the new terminal is expanded incrementally up to its full planned capacity, creating around 470 direct person years of employment per annum.

2.4.2 A significant number of construction jobs are expected to be created through the expansion program during construction leading to 623 Full Time Equivalent (FTE) jobs over the construction period.¹¹ Construction creates many opportunities for local people, but there will be a need to work with local training organisations and construction firms to ensure that local people have the skills to take advantage of the new jobs.

2.4.3 The construction of the Proposed Development is likely to create a significant number of direct jobs as well as indirect jobs. It is anticipated that the supply chain will benefit from job creation from the construction of the Proposed Development. Chapter 11 of the **Environmental Statement [TR020001/APP/5.01]** outlines that a further 3140 person years of employment (314 FTE) will be supported in industries supplying construction materials and services or will benefit from construction worker spend.

2.5 Opportunities in operational jobs

2.5.1 Based on findings outlined in the **Need Case [TR020001/APP/7.04]** it is anticipated that around 6,100 additional jobs (direct, indirect and induced)¹² could be supported by the airport's expansion in the ETS Study Area when 32 mppa is reached, when compared to figures for 2019. This comparison reveals the number of additional jobs that would be created as a result of the Proposed Development. Direct, indirect and induced jobs are defined as follows:

- a. **Direct operational jobs** – refers to jobs supported by firms which are integral to the operation of the airport. These jobs are projected to rise from 10,900 in 2019 and stabilise at around 11,700 by 2027 as 21.5 mppa is reached. By 2039, 27 mppa should be reached, at which point numbers

¹⁰ Person years are the equivalent of one full year of work for a full time worker. For example, one full time job that lasts 6 months is 0.5 person years; 10 full time jobs that last 6 months equates to 5 person years.

¹¹ Full Time Equivalents (FTEs) are calculated based on ten person-years. When measuring the benefits of a new full time job, those benefits can be accounted for over ten years. So, one FTE is 10 person years.

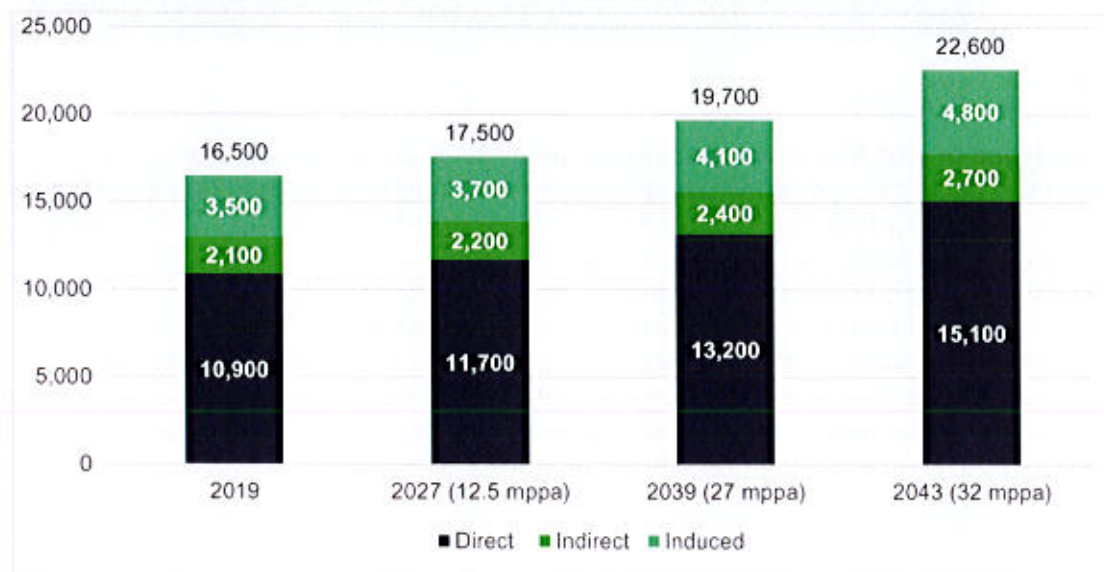
¹² Based on a comparison between the number of jobs which would have been created without the Proposed Development

will rise to approximately 13,200. By 32 mppa, this figure is forecast to reach approximately 15,100.

- b. **Indirect jobs** – refers to jobs supported by supply chains of the firms which make up the airport's direct impact. Indirect jobs created within the study area would increase to around 2,700 at 32 mppa (compared to 2,100 in 2019).
- c. **Induced jobs** – refers to jobs supported by those working at the airport and in its supply chain spending their earnings, for example in retail establishments. The induced jobs within the study area would increase to around 4,800 at 32 mppa (compared to 3,500 in 2019).

2.5.2 A summary of the ETS Study Area's forecast total employment growth from the proposed development is set out in Figure 2.3. The Applicant is working with local stakeholder organisations to refine priority programmes and activities to support local people to access the jobs that will be created by the Proposed Development.

Figure 2.3: Operational employment growth in the ETS Study Area (direct, indirect and induced)

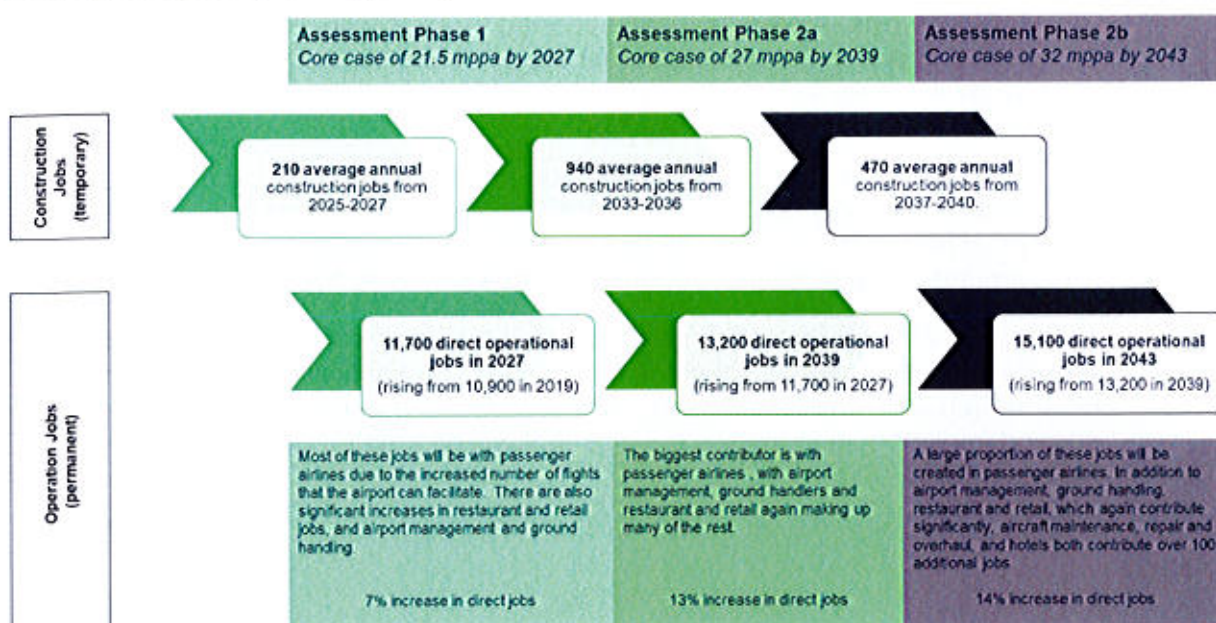


Source: Oxford Economics

*figures may not sum due to rounding The combined growth in construction and operational jobs

2.5.3 A summary of the construction and operational jobs which would be added through the airport expansion is set out below in Figure 2.4.

Figure 2.4: Summary of construction and direct jobs growth from the Proposed Development (core planning case)

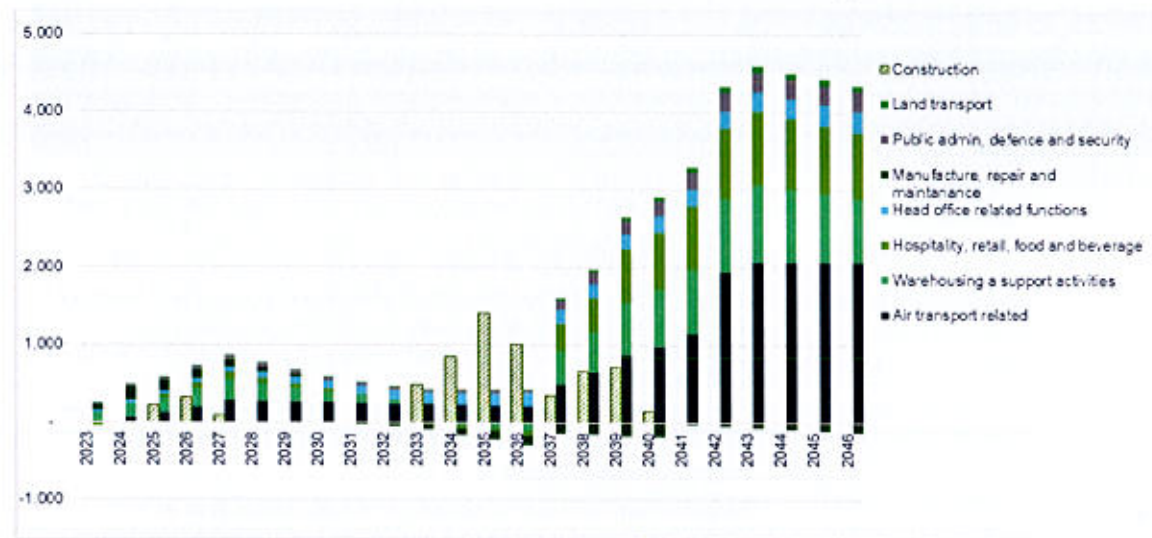


Source: Oxford Economics

*Some figures may not sum due to rounding

2.5.4 The types of jobs that would be created as a result of the construction and operation of the Proposed Development vary over time. Construction jobs would be significant, but relatively lower for enhancements to Terminal 1. The majority of new operational jobs will be in air transport (e.g., with people working for the airlines) and would therefore be created with the major expansion of air traffic enabled by the construction of a new Terminal 2. Other significant increases in jobs will come from hospitality, food and retail within the terminal, followed by warehousing and support activities, security, and land transport and tourism services. The additional jobs growth from construction and operation of the Proposed Development is presented in Figure 2.5 below.

Figure 2.5: Additional jobs during construction and operation by sector



Source: Oxford Economics

2.6 Potential skills and employment change in airport jobs

- 2.6.1 Wider changes to the economy, technology and society will change the types of jobs available and the skills that will be needed to do those jobs, especially over the long-term.
- 2.6.2 Table 2.1 sets out how these wider changes may affect jobs and skills requirements at the airport up to completion of the Proposed Development in 2043. These impacts have been considered in the employment projections presented in this section and in Chapter 11 of the **Environmental Statement [TR020001/APP/5.01]**.

Table 2.1: Potential skills and employment changes to airport jobs

Job	Potential changes to skills and employment requirements due to technological and macroeconomic change
Aircrew (cabin and flight)	<p>Increased use of technology and automation would support cabin and flight crew to perform their jobs more efficiently and safely, but this would also increase the requirement for continued training and technological know-how on a regular basis. Given the requirement of skilled cabin and flight crew to maintain safe flights and provide customer service, the Applicant does not foresee technology or automation leading to staff reductions.</p> <p>There are minimum crew requirements that are dependent on passenger loads and so support cabin and flight crew will continue to be needed.</p>
Security	<p>Employment in security would grow with expansion in the airport, but employment per passenger would likely decrease. Changing (more sophisticated) technologies will likely require more training on their use, and additional technology support and repair staff will likely be required, in line with the uptake of new technology.</p>
Car parking management	<p>As the move to public transport and electric vehicles increases, it is likely car park management staff would be needed.</p> <p>In the long-term (30+ years), Luton (and other airports) may have growth in autonomous vehicles for transport into and around the airport.</p>
Check-in and baggage handling	<p>In the short term, the need for staff (on a per-passenger basis) would decrease with the increased prevalence in self-service boarding passes and bag tags. There would however, always be a need for customer service and physical baggage handling.</p>
Immigration	<p>Immigration staff would likely increase in total numbers, but they would decrease on a per-passenger basis due to the rise in e-gates and e-passports. These staff must go through security training and checks. Funding is expected to fall for the UK Border Force, so up-skilling and retaining qualified workers will become increasingly important.</p>
Retail and Catering	<p>The food and beverage and retail industries are experiencing demand for higher quality experiences and better customer service, which would likely require more training for lower-skilled and entry-level employees.</p>
Ramp and airside operations	<p>Technology may reduce ramp staff demand in the long-term, but the employment effect and efficiency gains are likely to be minimal.</p>
Green jobs	<p>Advances in sustainability will likely require changes to the way people conduct their jobs and the technology and tools that they use. In construction and maintenance (both building and aircraft) jobs, the move to more sustainable materials and design solutions would likely require re-skilling and up-skilling, rather than wholesale shifts or redundancies in occupations.</p>

- 2.6.3 Looking forward, three macroeconomic themes could influence employment and skills demand at the airport: technological change, continued focus on customer services, and increased focus on sustainability. Sometimes these go in line with one another - self-service functions have been enabled through technology and driven by customer services, and a more sustainable airport would be enabled by improved aviation technology. Altogether, self-service could reduce the demand for workers and the skills demanded from those jobs, and increased focus on sustainability should drive demand for high-skill jobs. (Note: this 'net productivity' effect has been considered in the employment forecast estimates). Both could also require employees to upskill or become more efficient, opening up time for new tasks which may require additional skills. Technology could therefore make some skills obsolete while demanding new skills from employees.
- 2.6.4 The drive for better customer service and more sustainable airport operations would likely increase demand for skilled work and new skills. Often, better customer service means better technical achievement in jobs throughout the airport (e.g. fewer lost bags, better understanding of IT booking systems, and customer support with self-service machines). Therefore, even in the face of automation and self-service, the demand for excellence in customer service will drive the demand for a wide range of customer-centred and technical skills.
- 2.6.5 These three macro trends – technological change, focus on customer service, and sustainability – will require an increased investment in adapting skills at the airport. Lifelong learning, both on-the-job and in the classroom, will be important to retain staff and ensure they have the skills required to adapt to changing workplace demands.

3 THE OBJECTIVES AND PRINCIPLES OF THE ETS

3.1 The objective of the ETS

- 3.1.1 The main aim of the ETS is to shape a brighter future for local people, create quality careers, and make the airport an inclusive and aspirational place to work through the delivery of the Proposed Development. The ETS would achieve this by delivering a wide range of employment and training opportunities for local communities, including a focus on those in need, and investing in lifelong learning for workers at the airport.

3.2 A forward-looking ETS

- 3.2.1 Given that most long-term jobs growth during operations are going to occur in the next decade (please refer to Figure 2.3), with increased annual passengers up to 32 mppa, the ETS needs to be forward-looking and flexible to meet the employment and training needs of the Proposed Development over the next two decades.
- 3.2.2 This ETS cannot accurately predict all the skills needed for future jobs at the airport, especially looking 10 and 20 years in the future. Accordingly, setting out these principles to guide the goals and actions of the ETS will ensure that the initiatives are suitable for the future needs of the Proposed Development, airport businesses and local communities alike.
- 3.2.3 To ensure successful delivery, the ETS focuses on:
- a. Flexibility and adaptability of the ETS through completion of the Proposed Development: the strategy will be able to adapt to the changing needs of the development and external influences, such as technology or public policy.
 - b. Strength of relationships developed and maintained between stakeholders: the strategy focuses on developing strong, mutually beneficial relationships between key stakeholders. Mature governance of any joint initiatives will support smooth implementation of programmes.
 - c. Active engagement and forward-planning for skills programmes: this allows stakeholders to better plan, develop and implement the initiatives of the strategy and adapt as needed. Strong consideration is given to foresight planning and horizon scanning to plan for changes locally or in the industry that might affect skills and employment requirements.
 - d. Inclusion, giving opportunities to a wide range of people across the ETS Study Area: the strategy works to ensure that the airport is an attractive, inclusive and accessible place to work for all skill levels.

3.3 Key stages of the ETS

- 3.3.1 The ETS sets out key initiatives for the Applicant, the airport operator, and key partners to achieve the vision and goals set out above. The ETS will focus separately on two different periods:

- a. Construction – planning and actions required to maximise job and training opportunities for local people during construction. The airport operator would appoint contractors, and the operator would encourage them, where possible, to support access to employment opportunities for local people and on-the-job training where the relevant skills and resources are available.
- b. Operation – mechanisms to deliver the ETS through the operation of the expanded airport, with an emphasis on the additional jobs created through the delivery of the Proposed Development.

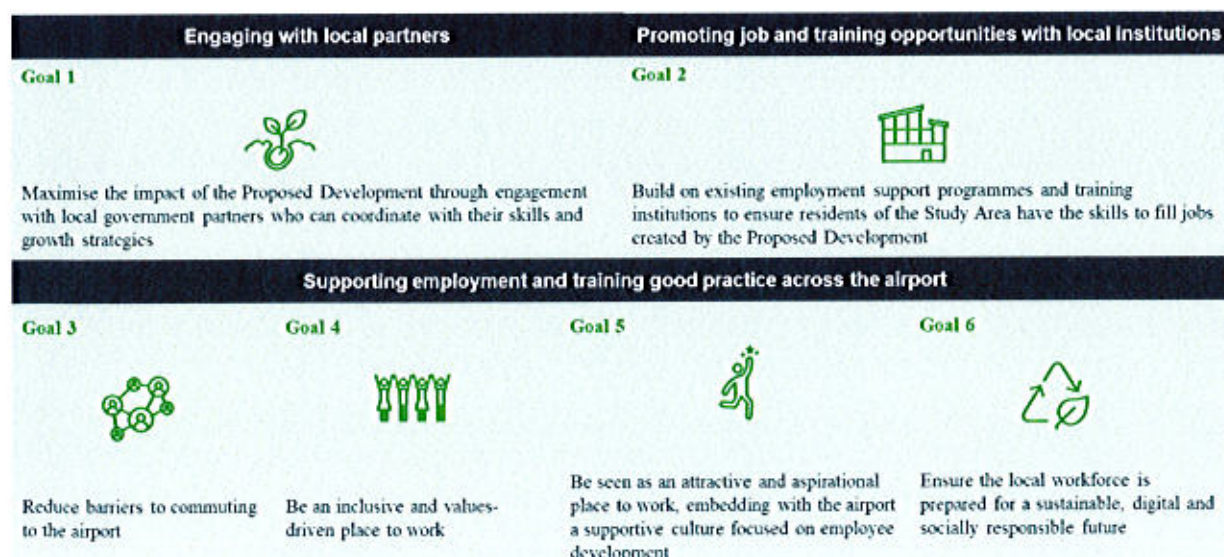
The Applicant will work closely with the airport operator at the pre-construction phase to enable the proposed initiatives to be implemented once construction starts, to maximise the benefits from construction and operation employment, as well as training opportunities. The Applicant will also work closely with local government partners across the ETS Study Area, including LBC, to coordinate their current skills strategies. One such example is the "Employment and Skills Strategy for Luton" (2021) (Ref 3.20).

4 THE GOALS OF THE ETS

4.1 Overview

- 4.1.1 The ETS sets out six key goals to deliver its objective (stated above in Section 3). The development of the six goals has taken into consideration the needs of the local communities, regarding the employment and skills requirements of the airport. The aim of the Proposed Development is to deliver sustainable economic growth. The goals set out below have been established to ensure that jobs and skills created as a result of the Proposed Development will generate meaningful benefits throughout the wider ETS Study Area. It is envisaged that the six goals will be reviewed regularly by the Applicant and the airport operator so that they remain appropriate and fit for purpose throughout the duration of both the construction of the Proposed Development as well as when it is fully operational.
- 4.1.2 These goals are presented in Figure 4.1. All elements taken together represent the **Luton Employment and Skills Programme (the Programme)**, which represent the joint goals and initiatives that the Applicant and the airport operator will pursue to deliver the ETS. The initiatives set out within the ETS have been ordered so that, within each goal, general initiatives across both construction and operation are set out first, followed by those related to construction activities only and lastly those which are related to operational activities. This structure is followed across all six goals.

Figure 4.1: ETS Goals



Initiative 0.1 Luton Airport Employment and Skills Programme (Construction and Operation)

- 4.1.3 The Applicant, in collaboration with the airport operator, will set up a **Luton Airport Employment and Skills Programme (the Programme)**, the

overarching name for the activities which will be undertaken to deliver the ETS. The Programme is organised into three parts:

- a. Engagement with local government partners to coordinate, at a strategic level, how their employment and training programmes can support people in the ETS study area into employment at the airport (Goal 1).
- b. Recruitment and outreach activities to promote employment and training opportunities across the airport with local employment support and training institutions, helping people in the ETS Study Area into work at the airport (Goal 2).
- c. Supporting employment and training good practice across the airport, during the construction phase as well as during operations, through an Airport Employer Community Forum (AECF), which will be a forum of HR representatives from across the airport businesses (Goals 3 – 6).

4.1.4 The focus would be on investing in and coordinating among existing good-practice education and training facilities in the region to build them up and create long-lasting ties between the airport and local institutions to ensure people in the ETS Study Area have the skills required for success at the airport.

4.1.5 Each goal also sets out proposed initiatives which will help the Applicant and airport operator achieve the objectives of the ETS.

4.1.6 The section below sets out the series of proposed initiatives, which the Applicant and airport operator are committed to delivering. In order to ensure the commitment to delivering these initiatives and, in turn, meet the goals set out within the ETS, the Applicant will secure commitment to the ETS through s106 contributions so that initiatives can be funded and delivered.

4.1.7 The Applicant, with the airport operator, would monitor and report on goals, targets, and progress of employment and skills initiatives set out within the ETS to check that they remain applicable and relevant as the Proposed Development progresses through construction and into operation.

4.2 Engaging local partners to achieve employment and skills aims

4.2.1 Local government plays an important role in developing the social and economic infrastructure in the ETS Study Area. Their engagement with education and training institutions plays an important role in ensuring the workforce has the skills required for future jobs. Given the long-term nature of the Proposed Development, the Applicant will need to regularly engage with local government partners to coordinate on how the growth plans at the airport align with the employment, skills and training strategies in the ETS Study Area.

Goal 1: Maximise the impact of the Proposed Development through engagement with local government partners who can coordinate with their skills and growth strategies

4.2.2 Overall, the ETS Study Area has high employment, high wages and a vibrant and growing economy, but there are also areas of deprivation. The growth strategies published by local authorities set out how they plan to help continue

growth whilst ensuring the fruits of this growth are enjoyed by all residents. The Proposed Development would be used to support these aims, but the Applicant would also recognise that integrating with these plans is a way of helping the expansion to be a success.

- 4.2.3 Goal 1 is underpinned by one initiative throughout the life of the Proposed Development:

Initiative 1.1 Regularly engage with local authority stakeholders in the ETS Study Area to optimise impact from the Proposed Development (Construction and Operation)

- 4.2.4 A new Local Economic Development Working Group (LEDWG) would be created with a focus on sharing skills and employment strategy information between the airport and local stakeholders for planning and coordination during both construction and operations, where appropriate. The Applicant would chair the LEDWG, with representatives from the airport operator attending as well as the relevant teams (e.g. economic development or skills and employment) at the local authorities across the ETS Study Area and the LEPs. The LEDWG will also liaise with the Employment and Skills Partnership Board (ESPB). The focus of the LEDWG would be to discuss local employment and training priorities to consider how the airport could play its part in supporting local growth and regeneration. This Working Group would also share good practice between the airport and local programmes, where appropriate.

4.3 Promoting job and training opportunities with local institutions (Construction and Operation)

- 4.3.1 Educational opportunities, training courses and career support programmes run by local institutions would be encouraged and coordinated to support local residents to take advantage of new employment opportunities made available through the Proposed Development during operations. As new employment opportunities will come into fruition many years into the future, the skills, needs and training requirements of future jobs will change. Thus, meeting this goal will require regular engagement between the Applicant, the airport operator, other airport employers and local institutions to ensure training is timely, relevant, and inclusive across construction and operations. Relationships with the lead contractor would be utilised, to encourage opportunities arising from the construction of the Proposed Development to be advertised locally where appropriate.

Goal 2: Build on existing employment support programmes and training institutions to ensure residents of the ETS Study Area have the skills to fill jobs created by the Proposed Development

- 4.3.2 The Applicant and the airport operator would engage with airport employers, local employment support providers, and local training providers to run a programme of engagement aimed at getting ETS Study Area residents into work at the airport. It will also provide residents with the connections to training

providers who can give them the necessary skills to enable them to work at the airport.

Initiative 2.1 Encourage the adoption of skills and training programmes during construction (Construction)

- 4.3.3 The construction of the Proposed Development offers a unique opportunity to provide different skills and training programmes of different levels such as apprenticeships, T-levels, graduate programmes, placements and other skills programmes. Where appropriate and possible, skills programmes will align to LBC's Local Employment and Skills Strategy and build on existing programmes run by LBC¹³.
- 4.3.4 LBC has a strict Social Value policy¹⁴ in place that goes beyond legal requirements, and which places a strong emphasis on employment and training. At the construction phase, through existing procurement frameworks that the airport operator has in place, the delivery of skills and training programmes can be incorporated into the tender process, with Invitation to Tenders outlining the need to interested contractors to outline key areas where they would deliver skills and training. The response to this requirement can then be tied into the overall tender scoring process.
- 4.3.5 During construction, the work contractors will be required to consider the latest green construction techniques and consider including them as part of the construction process, ensuring the skills required to use those techniques are understood. The lead contractor should engage with the Construction Industry Training Board to identify construction training programmes which may be required by the Tier 1 contractor, such as modern methods of construction and use of sustainable materials and methods. Pre-market engagement would also be undertaken by the airport operator to help contractors understand any new skills required for sustainable construction. The lead contractor will be encouraged to ensure training and job placements go to local residents, where possible.

Initiative 2.2 Code of Construction Practice (CoCP) (Construction)

- 4.3.6 During the construction phase, the **Code of Construction Practice [TR020001/APP/5.02]** would deliver effective planning, management and governance throughout the construction period to manage potential impacts upon individuals, businesses and the natural and historic environment. It also outlines processes to engage with the local community and their representatives.

¹³ Luton Borough Councils Local Skills Improvement Plan 2022-2026 can be found here: chrome-extension://efaidnbnmnncipcajpcgiclfndmkaj/https://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/luton-employment-and-skills-strategy-2022-2027.pdf

¹⁴ Luton Borough Council's Social Value toolkit and policy (2020) can be found here: <https://m.luton.gov.uk/Page/Show/Business/Doing%20business%20with%20the%20council/Pages/default.aspx>

Initiative 2.3 Luton Jobs and Skills Engagement Programme (Operation)

- 4.3.7 During operations, the airport operator, alongside the Applicant, will seek to build on existing, proven activities to develop a jobs and skills engagement programme. This will include activities to help residents of the ETS Study Area into work at the airport and connect them with training providers who can give them the skills they need.
- 4.3.8 The airport operator and the Applicant would continue to deliver the existing "Get into Airports" scheme which currently provides placements in collaboration with the Prince's Trust. This programme would create opportunities to provide workplace experience, alongside the opportunity to gain qualifications within the aviation industry for individuals who are currently unemployed or face barriers to employment.
- 4.3.9 These activities would be complemented by the Jobs and Training Fairs (Initiative 5.1) which would provide multiple opportunities throughout the year to bring together employers at the airport with local education, training and employment support organisations to promote opportunities for work at the airport.

4.4 Supporting employment and training good practice across the airport

- 4.4.1 Encouraging employment and training good practice across the airport during construction and operation remains a key priority for the Applicant and the airport operator. During construction, the airport operator will deliver those initiatives identified for the construction phase in the sections below (Initiatives 4.1, 4.2, 5.1 and 6.1).
- 4.4.2 During operation, to encourage and support good practice, the airport operator will set up the Airport Employers Community Forum (AECF) including human resources leaders from businesses across the airport, which will set the benchmark for good practice. The AECF will provide a space for which to discuss any issues relating to accessibility, equality, diversity and inclusion, recruitment or procurement. It will provide a platform of members to share knowledge and best practice to create a high-quality work environment. Members of the AECF will include the airport operator and is intended to include contractors and third-party businesses, and the airport operator will chair this Forum.
- 4.4.3 The AECF helps to meet four out of the six goals outlined earlier within Section 4 of this strategy. A series of initiatives have been set out that underpin the ability to achieve these goals.

Goal 3: Reduce barriers to commuting to the airport

- 4.4.4 To ensure the employment needs of Luton airport are met, the airport needs to access as large a pool of potential workers as possible. To do this, the ETS would provide avenues for the airport operator and airport employers to work with partners to address transport barriers to work that many in the area face

(distance, time, cost, convenience, and sustainability). In coordination with the vision and objectives embedded in the **Surface Access Strategy [TR020001/APP/7.12]**, improved accessibility with a focus on sustainable and active travel, technology and communications and new ways of working would also help meet wider economic and environmental ambitions of the ETS, including emphasising opportunities for local residents.

- 4.4.5 Goal 3 is underpinned by one initiative for airport operations:

Initiative 3.1 Coordination with the Airport Transport Forum (Operation)

- 4.4.6 Shift working is common amongst airport employees. These workers can struggle with commuting to and from the airport, as transport connectivity significantly decreases during times that some airport employees need to travel (i.e. night-time and early mornings).

- 4.4.7 The AECF would coordinate with the Airport Transport Forum to understand workers' needs and provide a channel for employers' and employees' views to be engaged, through the AECF Chair, with the Travel Plan Coordinator, a transport planner overseeing the on-going development and implementation of the **Framework Travel Plan [TR020001/APP/7.13]**.

- 4.4.8 Other interventions and measures to support employees' access to the airport as well as employment and training opportunities will be developed as part of the **Framework Travel Plan [TR020001/APP/7.13]**.

Goal 4: Be an inclusive and values-driven place to work

- 4.4.9 Although the ETS Study Area is mainly characterised by high wages, educational attainment and opportunity, there are areas of high deprivation and barriers to employment and training in Luton and across the ETS Study Area. The Proposed Development would provide a range of job opportunities, including quality jobs at good wages (Section 2.1.1), and should target these towards communities that are most in need. The Proposed Development presents a key opportunity to address barriers to work and ensures the opportunities of the airport are available to all, regardless of age, language proficiency, access to transport, wealth, or circumstance. The airport and employers within the airport should recognise the untapped labour potential of groups such as parents, carers and the young and inexperienced.

- 4.4.10 Goal 4 is underpinned by six initiatives across construction and operation:

Initiative 4.1 Ensure high working standards, including the Living Wage (Construction and Operation)

- 4.4.11 During construction, the airport operator will encourage adoption of the Real Living Wage (RLW) for its contractors through the procurement process.

- 4.4.12 During operations, the airport operator would work with employers at the airport to support the RLW to be adopted or maintained across the airport and that high quality employment standards are promoted, including aiming to reduce zero hours contracts. The airport operator has already implemented the Real Living

Wage and they will support and encourage other businesses across the airport to adopt it. Adoption of RLW will be discussed through the AECF.

- 4.4.13 The AECF would work with other businesses at the airport to implement similar measures and create a **Luton Workplace Charter**, which airport businesses would be encouraged to sign up to. The Charter will promote the airport's values and high working standards, or alternatively encourage and coordinate airport businesses signing up to the "Good Business Charter," developed by LBC (Ref 4.21). The Workplace Charter would be owned and managed by the AECF, encouraging better inclusion practices and good working standards across the airport on issues raised through the AECF.

Initiative 4.2 Encourage local employment and local businesses (Construction and Operation)

- 4.4.14 The airport operator will continue to prioritise utilising local businesses within their supply chain. Using existing procurement frameworks that are currently in place, measures within the existing frameworks should be implemented to help ensure that opportunities are more accessible to local Small to Medium Enterprises (SMEs), who are key employers for local communities. The airport operator will also encourage contractors to draw on the local workforce allowing employment opportunities to be created within local communities.
- 4.4.15 During the construction phase, the existing procurement process will support, where possible and practical to do so, the development of standard procurement materials, easy-to-understand requirements, and provide support to ensure procurement opportunities are inclusive and accessible to various types and sizes of businesses. During this process, the relevant procurement teams will endeavour to implement the practices outlined above into the procurement process. The Skills Foresight Leader (encompassed within the role of the Capex Director) (see Initiative 6.2) will define any Invitation to Tenders, assess responses based on requirements, and ensure that the notification of potential tenders reach SMEs and that they are able to access these opportunities.
- 4.4.16 The Applicant and airport operator are committed to delivering the LPP allowing businesses within the ETS study area to be given the opportunity to bid/tender for the provision of goods and services for the construction of the Proposed Development. The airport operator will also promote the LPP to businesses operating at the airport in accordance with the LPP. The LPP is outlined in further detail in Appendix A.
- 4.4.17 During operation, the airport operator and the Applicant will continue to work together to endeavour to recruit from local communities, and following existing agreements, they will continue to encourage the recruitment of local residents. For example, the Applicant and the airport operator will also continue to assess the outreach of local recruitment channels to allow jobs at the airport to be advertised locally and where possible made available to those within the ETS Study Area.

Initiative 4.3 Foster diversity and inclusion (Operation)

- 4.4.18 The Applicant supports the fair treatment of people from all groups and is interested in promoting the interests of customers, visitors and employees. Diversity and inclusion would continue to be promoted by the airport operator. This will be supported through the AECF, which would be used as a platform for the airport operator and AECF members to share best practice and facilitate Equality, Diversity and Inclusion (EDI) discussions between AECF members. The AECF would use this forum to consider any issues relating to EDI regarding airport operations and facilities. The AECF will seek to support those from vulnerable groups to have equality of opportunity within the working environment of the airport as well as with access to new employment opportunities.
- 4.4.19 The AECF will seek to understand barriers to employment and to creating a more diverse and inclusive airport, building on some of the existing policy currently in place such as the London Luton Airport Disability Policy (Ref 4.22). The airport operator will endeavour to expand the understanding and specific requirements of employers to create a more diverse and inclusive airport. Where possible, it is encouraged that the airport operator involves representatives from various groups in the AECF (i.e. disability groups, women, Black and Minority Ethnic (BME) groups) to ensure that proposals do not create barriers to access employment for vulnerable groups.
- 4.4.20 In addition to the above, where there are requests from supporting agencies, major suppliers, contractors, tenants, concessionaires and service partners to support more inclusive workplaces, the airport operator will share their own tools and good practice materials, where appropriate.

Initiative 4.4 Monitor employees' wellbeing through an annual employee survey (Operation)

- 4.4.21 Related to fostering diversity and inclusion and with the aim of monitoring and promoting employee wellbeing, one role of the AECF includes ensuring that initiatives to improve outcomes that reflect the Applicant's values are delivered. To do so, an annual survey, utilising the pass holder survey that is being implemented across the airport, will be conducted to request input on specific areas that the operator (in agreement with the AECF) considers would be helpful to understand further, including health and wellbeing as well as diversity and inclusion. In advance of the survey being circulated, the AECF will raise and agree topics and/or questions that should be included within the survey to try and capture employee feedback on any priority topics that have been raised through the AECF.

Initiative 4.5 Take care of seasonal workers (Operation)

- 4.4.22 Employment at the airport could fluctuate with additional workers being required during busier seasons when there are likely to be more passengers. Where there are opportunities to publicise future employment opportunities, Skills and Training Fairs organised by the operator will be made available.

Goal 5: Be seen as an attractive and aspirational place to work, embedding the airport within a supportive culture focused on employee development

- 4.4.23 A key challenge for the airport is securing future labour supply across all skill levels in highly competitive labour markets. The Applicant and the airport operator aim is for the airport to be a place known for an inclusive and positive work environment that provides development opportunities and career prospects at all levels. The airport operator and AECF would be encouraged to take into consideration staff satisfaction and retention, in addition to recognising the positive impacts of staff development. By re-orientating the airport within the minds of potential employees, the airport can continue to be a place where people aspire to work.

- 4.4.24 Goal 5 is underpinned by initiatives across construction and operation:

Initiative 5.1 Community outreach programme (Construction and Operation)

- 4.4.25 The Applicant and the airport operator will seek to build on existing activities, including community job fairs and attendance at the Luton Employability Day to ensure that engagement with local education institutions, charities, and community groups is undertaken to support the airport's embedment within local communities, and that the relevant groups are informed about employment and training opportunities related to airport activities.
- 4.4.26 The Applicant and the airport operator would develop appropriate ways to organise different activities including: guest speakers at training events, STEM outreach activities with local schools, and site visits to inspire and inform students and the local community. The team encourage and support the delivery of school outreach programmes, ensuring local students are exposed to the careers and opportunities at the airport. In particular, this outreach will focus on STEM-related opportunities to inspire more students, and those who may return to work, to take on the required education and training for jobs at the airport. Specific targets for ambassadors and the number of events would be set at the construction and operation phases.
- 4.4.27 Both the Applicant and the airport operator would consider further ways to work side-by-side with local groups and community leaders to ensure people can realise pathways into work at the airport.

Initiative 5.2 Recruitment services and career counselling (Operation)

- 4.4.28 To support recruitment of residents of the ETS Study Area into jobs at the airport, the AECF will expand the airport operator's existing Jobs Fairs to include Jobs and Skills Fairs. These Fairs will bring together employers at the airport with local HE and FE institutions, other training providers and employment support providers to help people either get into work at the airport or access the relevant local education and training programmes that can help

them get the type of job they want at the airport. Jobs and Skills Fairs will be held multiple times throughout the year.

4.4.29 Airport employees often change employer within the airport as new opportunities arise. In recognition of this, the Programme would utilise the existing recruitment strategy and agreement between the airport operator and the Applicant, which is focused on ensuring that recruitment practices are fair and equitable across all groups. Both the airport operator and the Applicant would engage closely with airport employers (through the AECF), local education institutions and training providers to consider ways to develop access to employment opportunities and recruitment at the airport.

4.4.30 The airport operator, as part of the AECF, will encourage organisations working across the airport to advertise their jobs on the Working at Luton Airport website. The website advertises jobs across the airport and can be leveraged to advertise jobs created during construction and operation of the Proposed Development. The airport operator and main contractor should endeavour to advertise job opportunities within the local areas so that local residents can benefit from potential jobs.

4.4.31 The Working at Luton website can also be used to host readily available resources for career counselling from Job Centre plus or local authorities. These resources could be made available to employees of airport businesses, including online guidance, recommendations for training opportunities (depending on skills level) and career ambitions.

4.4.32 The Applicant and airport operator teams would work closely with key stakeholders in the local community to ensure any programmes developed more widely are accessible to the communities being engaged with locally.

Goal 6: Ensure the local workforce is prepared for a sustainable, digital and socially responsible future

4.4.33 Airports are seeing rapid change from technological advances in automation and digitalisation, whilst grappling with the challenge of sustainability in a carbon-intensive sector. To ensure the airport has access to the right skills at the right time, preparation and planning is needed to keep ahead of the curve with technological change and sustainability.

4.4.34 Goal 6 is underpinned by two initiatives which take place from construction onwards, as well as those initiatives covered by Goal 1.

Initiative 6.1 Provide skills foresight to ensure future skills needs are planned for in advance (Construction and Operation)

4.4.35 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 and, where required, will draw on support from specialists to support the procurement process. The specialists will ensure that any new skills required for construction are identified and are available for the construction of

the Proposed Development as well as ensuring that new construction methods feed into the procurement process.

- 4.4.36 The role of the SFL would encourage modern methods of construction and engagement with other infrastructure schemes and asset managers to make sure the Proposed Development leads the way in training employees on new and sustainable construction skills, which they can continue to apply in the future. The SFL would have oversight of how Tier 1 contractors should utilise the skills to take on new technology, new sustainable materials and methods of construction, and more inclusive work environments.
- 4.4.37 The SFL would work with contractors throughout construction to encourage opportunities for those in training to engage with new and more sustainable methods of construction as well as providing a platform for training initiatives to be delivered, both online and via an existing physical space provided by the Applicant where appropriate. This will help embed good practice and new technologies in construction at the airport.
- 4.4.38 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. New technology and sustainable solutions will create requirements for new skills sets. As projects come forward, project teams will be supported by the airport operator's Human Resources team to discuss how skills requirements could be shaped and embedded into the project.

4.5 Summary and Phasing of Initiatives

Table 4.1 Summary of initiatives, timeline and potential partners

No.	Action	Timeline	Potential Partners
0.1	Luton Employment and Skills Programme	Construction & Operation	The Applicant and the airport operator
Goal 1: Maximise the impact of the Proposed Development through engagement with local government partners who can coordinate with their skills and growth strategies			
1.1	Regularly engage with local authority stakeholders in the ETS Study Area to optimise impact from the Proposed Development	Construction & Operation	The Applicant Local Authority Economics or Employment Leads in ETS Study Area HE and FE institutions, as appropriate
Goal 2: Build on existing employment support programmes and training institutions to ensure residents of the ETS Study Area have the skills to fill jobs created by the Proposed Development			
2.1	Encourage the adoption of skills and training programmes during construction	Construction	The Applicant and the airport operator LEPs Local authorities

No.	Action	Timeline	Potential Partners
2.2	Code of Construction Practice (CoCP)	Construction	Construction contractors
2.3	Luton Jobs and Skills Engagement Programme	Operation	The Applicant and the airport operator Education institutions Training providers Airport businesses Local charities and community groups CITB
Goal 3: Reduce barriers to commuting to the airport			
3.1	Coordination with the Airport Transport Forum	Operation	AECF

No.	Action	Timeline	Potential Partners
Goal 4: Be an inclusive and values-driven place to work			
4.1	Ensure high working standards, including the Living Wage	Construction & Operation	Airport businesses
4.2	Encourage local employment and local businesses	Construction & Operation	Construction contractors
4.3	Foster diversity and inclusion	Operation	Airport businesses
4.4	Monitor employees' wellbeing through an annual employee survey	Operation	Airport businesses
4.5	Taking care of seasonal workers, supporting them into other work and training	Operation	Airport businesses Training providers
Goal 5: Be seen as an attractive and aspirational place to work, embedding the airport with a supportive culture focused on employee development			
5.1	Community outreach programme	Construction & Operation	Education institutions Training providers Local charities Community groups Religious groups
5.2	Recruitment services and career counselling	Operation	Education institutions Training providers Airport businesses

No.	Action	Timeline	Potential Partners
Goal 6: Ensure the local workforce is prepared for a sustainable, digital and socially responsible future			
6.1	Provide skills foresight to ensure future skills needs are planned for in advance	Construction & Operation	Education institutions Training providers

Table 4.2 Summary of the phasing of initiatives

Initiatives	Scheme Stage			
	Enhanced Terminal 1 2023-2027	Enhanced T1 and T2 2028-39	Enhanced Terminal 2 2040-43	Operation
0.1 Luton Employment and Skills Programme				
1.1 Create a Local Economic Development Working Group to align growth strategies with local government partners and share good practice				
2.1 Encourage the adoption of skills and training programmes during construction				N/A
2.2 Code of Construction Practice (CoCP)				N/A
2.3 Luton Jobs and Skills Engagement Programme				
3.1 Coordination with the Airport Transport Forum				
4.1 Ensure high working standards, including the Living Wage				

Key	Develop & Implement	Grow	Maintain	Ramp Down

Initiatives	Scheme Stage			
	Enhanced Terminal 1 2023-2027	Enhanced T1 and T2 2038-39	Enhanced Terminal 2 2040-43	Operation
4.2 Encouraging local employment and local businesses				
4.3 Foster diversity and inclusion				
4.4 Monitor employees' wellbeing through an annual employee survey				
4.5 Taking care of seasonal workers, supporting them into other work and training				
5.1 Community outreach programme				
5.2 Recruitment services and career counselling				
6.1 Provide skills foresight to ensure future skills needs are planned for in advance				

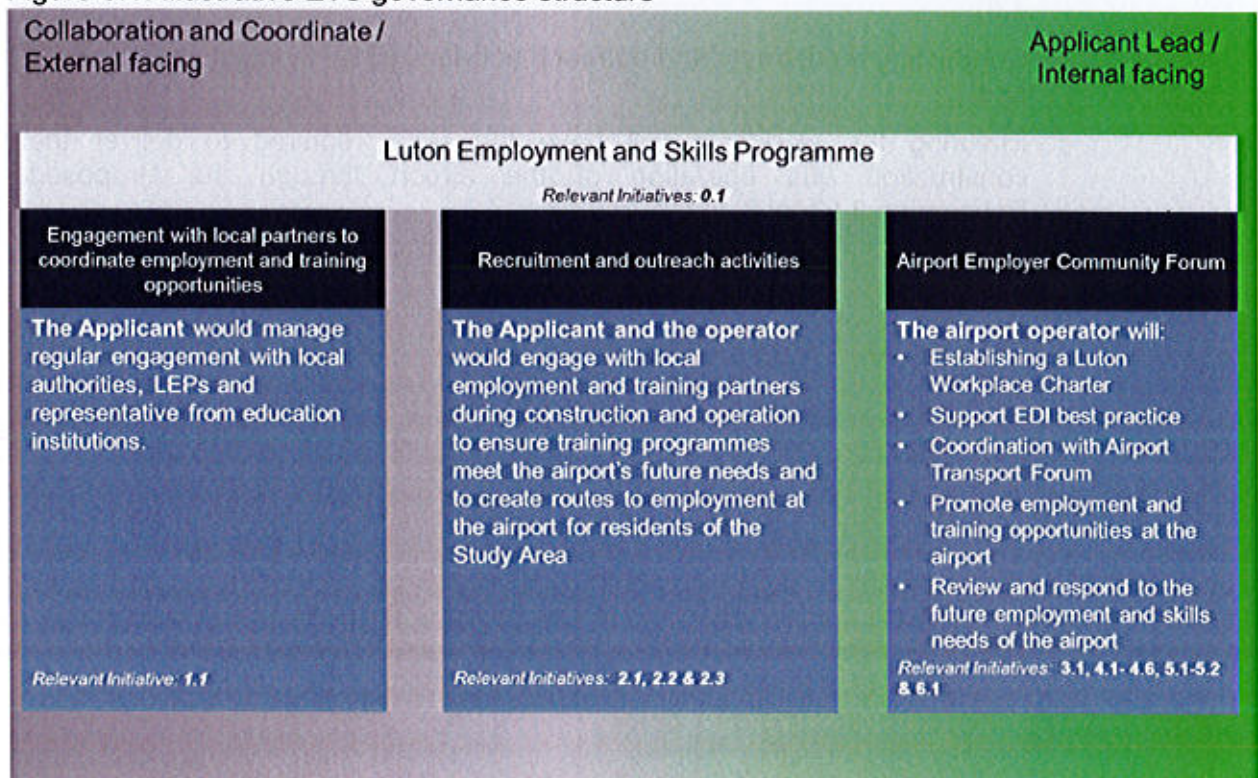
Key	
	Develop & Implement
	Grow
	Maintain
	Ramp Down

5 DELIVERING THE ETS

5.1 Governance

- 5.1.1 Delivering the ETS would require an appropriate governance structure which allocates resources and responsibilities to different teams and members of staff to be managed and resourced by the Applicant and the airport operator. As the project progresses from construction to operation, this governance structure would evolve and grow in line with the opportunities presented by each phase.
- 5.1.2 Key partners that the Applicant and the airport operator would work with to deliver these initiatives are expected to include businesses at the airport, FE colleges, HE institutions, and other organisations including charities supporting training, outreach programmes, and access to jobs.
- 5.1.3 An illustrative governance structure has been developed to deliver the initiatives set out in the previous section and achieve the overall ETS vision and goals. This governance structure is set out below in Figure 5.1.

Figure 5.1: Illustrative ETS governance structure



- 5.1.4 This structure is divided into three categories which are tasked with delivering the six goals of the ETS.
- 5.1.5 The Applicant will lead on delivering engagement with local government partners to coordinate, at a strategic level, how their employment and training programmes can support people in the Study Area into employment at the airport. The Applicant, to deliver Objective 1 (Initiative 1.1), will regularly

convene relevant local government stakeholders to this end, and the airport operator will be invited to engage with this group.

- 5.1.6 The Applicant and the airport operator will jointly lead recruitment and outreach activities to promote employment and training opportunities across the airport with local employment support and training institutions, helping people in the ETS Study Area into work at the airport as well as the LPP. They will oversee the delivery of Objective 2 (Initiatives 2.1 and 2.2) through those outreach and coordination activities.
- 5.1.7 The airport operator will lead on supporting employment and training good practice across the airport, through an Airport Employer Community Forum (AECF). The AECF would be a forum of HR representatives from across the airport businesses alongside the airport operator working to deliver Objectives 3 – 6, which include:
- a. Helping to ensure the airport has the transport accessibility necessary for the workforce (Goal 3, Initiative 3.1);
 - b. Being an inclusive and values-driven place to work (Goal 4, Initiatives 4.1-4.6);
 - c. Conducting recruitment and outreach activities (Goal 5, Initiatives 5.1 -5.2); and
 - d. Ensuring the workforce will have the skills required to deliver the construction and operation of the airport through the Proposed Development (Goal 6, Initiative 6.1).

6 NEXT STEPS

- 6.1.1 This document presents the ETS that is being submitted as part of the application for development consent and secured through a s106 agreement. The Applicant and the airport operator will continue to work with a wide range of stakeholders to ensure the vision and goals set a clear, ambitious and inclusive way forward for the Proposed Development through the initiatives set out across the construction and operational phases.
- 6.1.2 Any monitoring and evaluation of outcomes and initiatives outlined within the ETS will be agreed and scoped out once a decision on the DCO consent has been reached. The Applicant together with the airport operator will regularly monitor and review progress against its own objectives, to ensure their efficiency.

GLOSSARY AND ABBREVIATIONS

Term	Definition
AECF	Airport Employer Community Forum
ETS	Employment and Training Strategy
FE	Further Education
HE	Higher Education
JSA	Job Seeker's Allowance, an unemployment benefit one can claim while looking for work – a common measure of unemployment
LEDWG	Local Economic Development Working Group
LLAOL	London Luton Airport Operations Ltd., the company that operates the airport
LPP	Local Procurement Protocol (definition provided in Section 1.1.4 and outlined in Appendix A)
Luton Rising	A trading name of London Luton Airport Limited, the company that owns the airport
SLF	Skills Foresight Leader
SMEs	Small to Medium Enterprises
AECF	Airport Employer Community Forum

REFERENCES

- Ref 1.1 Outline Employment and Training Strategy (2019), Accessed 7 December 2022
- Ref 1.2 Draft Employment and Training (2022), Accessed 7 December 2022
- Ref 2.3 Oxford Economics (2021) The Economic Impact of London Luton Airport, Accessed December 2022
- Ref 2.4 Office for National Statistics (2020), 'Annual Survey of Hours and Earnings', Accessed 18 Nov 2020
- Ref 2.5 Office for National Statistics (2020), 'Annual Survey of Hours and Earnings', Accessed 18 Nov 2020
- Ref 2.6 Luton Borough Council (2022), Luton Employment & Skills Strategy 2022-2027, Accessed December 2023
- Ref 2.7 Index of Multiple Deprivation (2019), 'IMD sub-metric under Education, Skills and Training Deprivation', Accessed 5 July 2019
- Ref 2.8 Office for National Statistics (October 2020), 'Jobseekers Allowance by Occupation', Accessed November 2020
- Ref 2.9 Office for National Statistics (2019), 'Population projections at local authority level', 2019-2040 Accessed 14 Dec 2020
- Ref 2.10 Office for National Statistic (2020), 'Annual Population Survey', Jan 2019 – Dec 2019', Accessed 26 November 2020
- Ref 2.11 Luton Borough Council (2022), Luton Employment & Skills Strategy 2022-2027, Accessed December 2023
- Ref 2.12 Office for National Statistic (2020), 'Annual Population Survey', Jan 2019 – Dec 2019', Accessed 26 November 2020
- Ref 2.13 Office for National Statistics (2020), 'Jobseekers Allowance', Accessed 24 Nov 2020
- Ref 2.14 Office for National Statistics (2011), 'Census 2011', Accessed 23 June 2021
- Ref 2.15 Office for National Statistics (2020), 'Annual Population Survey', July 2019 – June 2020, Accessed 26 November 2020
- Ref 2.16 Office for National Statistics (2020), 'Annual Population Survey', July 2019 – June 2020, Accessed 26 November 2020
- Ref 2.17 Office for National Statistics (2019), 'Which occupations are at highest risk of being automated.'
- Ref 2.18 Department for Education (November 2019), 'Apprenticeship Achievements, 2015-2019', Accessed 1st August 2019
- Ref 2.19 Department for Education (October 2020), 'Employer Skills Survey', 2019, Accessed 25 September 2020
- Ref 3.20 Luton Borough Council, Employment and Skills Strategy for Luton 2021, Accessed December 2022
- Ref 4.21 See Luton Borough Council Corporate Plan 2021-2023 for reference to the Good Business Charter
- Ref 4.22 London Luton Airport Disability Policy (2022), Accessed December 2022

APPENDIX A: LOCAL PROCUREMENT PROTOCOL

Construction Phase

The appointed contractors will be encouraged to procure goods and services from businesses operating in the local area where possible. The airport operator will maintain annual contact with its lead contractors, obtaining updates on procurement activity and encouraging procurement activities which are open to local companies.

The airport operator will organise 'How to Bid for Contracts' events for buyers and suppliers to encourage local expenditure. These events will be recorded and their success monitored annually.

Operational phase

The airport operator already procures a substantial proportion of its goods and services from the local area. In 2022, 53% of total spend was through local suppliers based within 35 miles of the airport.

The airport operator will use reasonable endeavours to provide opportunities for local businesses to bid/tender for the provision of facilities management services and other post-construction supply of goods and services by adopting the following procurement protocol:

- a. The airport operator's procurement team will promote as a group, local procurement through social value questions in tenders.
- b. Nominate an airport operator staff member to promote local procurement.
- c. Hold local 'How to Bid for Contracts' events twice a year inviting local businesses to train and give bid guidance to suppliers on how to win contracts with the airport operator.
- d. Encourage local suppliers through 'How to Bid for Contracts' events to register on the procurement portal for the airport operator's tender opportunities.
- e. Of total spend, continue to target a local procurement spend of 50% annually.
- f. Encourage other businesses and operators based at the airport to undertake similar measures.
- g. Engage with Luton Borough Council's Procurement Team in sharing procurement ideas and how best to encourage local businesses to bid for tenders published by the airport operator.
- h. To attend local SME and business community events and network with local suppliers.

APPENDIX 5
COMPENSATION POLICIES, MEASURES AND COMMUNITY FIRST



February 2024

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 7 Other Documents

**7.10 Compensation Policies, Measures and Community
First**

Application Document Ref: TR020001/APP/7.10
APFP Regulation 5(2)(q)

The Planning Act 2008

**The Infrastructure Planning (Applications: Prescribed Forms and Procedure)
Regulations 2009**

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

**7.10 COMPENSATION POLICIES, MEASURES AND COMMUNITY
FIRST**

Regulation number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	TR020001
Document Reference:	TR020001/APP/7.10
Author:	Luton Rising

Version	Date	Status of Version
Issue 1	February 2023	Application issue
Revision 1	April 2023	Amended following section 51 advice
Revision 2	June 2023	Additional Submissions – Amended following Rule 9 Letter
Revision 3	September 2023	Additional Submissions – Deadline 2
Revision 4	November 2023	Additional Submissions – Deadline 4
Revision 5	January 2024	Additional Submissions – Deadline 7
Revision 6	January 2024	Additional Submissions – Deadline 9
Revision 7	February 2024	Additional Submissions – Deadline 10
Revision 8	February 2024	Additional Submissions – Deadline 11

EXECUTIVE SUMMARY

Luton Rising is a business and social enterprise that is owned by a sole shareholder, Luton Borough Council, for community benefit, and who are at the heart of a movement for positive change in Luton and the Luton community. Luton Rising is a trading name of London Luton Airport Limited (the Applicant) and owner of London Luton Airport.

Expansion of Luton airport will create many positive benefits for surrounding communities – including thousands of job opportunities and better connections to friends and family abroad.

However, it is recognised that even after applying best practice in design and mitigation measures, some neighbours may still be negatively affected, for example by noise impacts. Where this happens, there is a commitment to making sure that residents and businesses are fairly compensated and to achieving this where possible by compensatory mitigation such as for noise insulation to avoid the negative environmental effects. In many cases the proposal is to go above and beyond the legal compensation requirements and current best practice to provide an offer that Luton Rising (the Applicant) believes is fair.

This document provides detail about the compensation measures the Applicant will introduce, including who qualifies. The measures in this document are to be secured via a section 106 agreement which ensures that the proposals remain enforceable. This is in line with how the existing community fund is secured. Also provided are details of the proposal to create a Community First fund, which is designed to enhance the benefits to neighbouring communities of airport growth.

If your property is negatively impacted by noise from expansion

For residents adversely affected by noise from airport expansion, LR is offering an enhanced Noise Insulation Scheme that is more generous and will cover significantly more properties than the current scheme. Depending on the level of noise impact at your property, these schemes range from contributions of up to £20,000 towards noise insulation works on your property, to a full package of noise insulation for habitable rooms for residential properties exposed to significant levels of noise.

The Applicant is also offering noise insulation for community buildings exposed to higher levels of noise, which will include nursing homes, schools, libraries, and places of worship.

Under all the noise assessment scenarios (see Section 16.9 of **Chapter 16 Noise and Vibration** of the **Environmental Statement [TR020001/APP/5.01]**) no properties are expected to be at risk of being unacceptably affected. If any property falls into this category in the future, the policy (Clause 4, p.9) provides an offer of voluntary acquisition. However, the Applicant does not expect this to be required and the policy is there as a precaution for unanticipated changes over the life of the Proposed Development.

The Applicant will also open a residential hardship policy for eligible residents, where the Applicant will offer to acquire a property the owner cannot sell it on the open market (because of the expansion) and this would lead to exceptional hardship.

What are the compensation proposals if the Applicant needs to acquire property

The Applicant owns or controls much of the land required for the proposals and so the land or rights required to deliver the Proposed Development are more limited. The Applicant will only seek to acquire land or rights that are absolutely necessary to deliver the Proposed Development.

For the small number of cases where existing businesses will need to be relocated, the Applicant will compensate based on market value of the property interest (e.g. Freehold) along with relocation costs. The Applicant will also strive to be as flexible as possible around relocation timing and will support local relocation wherever that is feasible.

Community First – sharing the benefits with our neighbours

The Applicant makes a direct social contribution through the revenues received from the operation of the airport. As these revenues grow with the Proposed Development, it is intended that these local and community investments will increase pro-rata to growth. In particular, the Applicant will establish the Community First fund providing £1/passenger from growth above 19 million passengers per annum (mppa).

Overall, these direct social contributions will be substantial and in excess of similar schemes in place at other UK airports. This adds further to the potential beneficial impacts of the Proposed Development. Community First will be independently administered and be subject to regular reviews to ensure that its objectives remain relevant and in line with local priorities through time.

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Figures

Figure 9.1: Community First zone

Tables

Table 1.1: Indicative Guide to Discretionary Compensation

1 INTRODUCTION

- 1.1.1 This document has been prepared to support the proposed expansion of London Luton Airport (the Proposed Development). This application is made by Luton Rising (a trading name of London Luton Airport Limited (the Applicant), and owner of London Luton Airport, to the Planning Inspectorate for a Development Consent Order (DCO) to seek the necessary consent to construct, operate and maintain the Proposed Development. Luton Rising is a business and social enterprise that is owned by a sole shareholder, Luton Council, for community benefit, and who are at the heart of a movement for positive change in Luton and the Luton community.
- 1.1.2 Luton Rising (the Applicant), is seeking to make best use of the existing runway at London Luton Airport by constructing a new terminal and associated infrastructure to increase the number of flights and passengers the airport can handle. This will take the overall passenger capacity of the airport to 32 million passengers per annum (mppa)¹.
- 1.1.3 In addition to the above and to support the initial increase in demand, the existing infrastructure and supporting facilities will be improved in line with the short-term requirements for additional capacity.
- 1.1.4 Key elements of the Proposed Development include:
- a. Extension and remodelling of the existing passenger terminal (Terminal 1) to increase the capacity;
 - b. New passenger terminal building and boarding piers (Terminal 2);
 - c. Earthworks to create an extension to the current airfield platform; the vast majority of material for these earthworks would be generated on site;
 - d. Airside facilities including new taxiways and aprons, together with relocated engine run-up bay and fire training facility;
 - e. Landside facilities, including buildings which support the operational, energy and servicing needs of the airport;
 - f. Enhancement of the existing surface access network, including a new dual carriageway road accessed via a new junction on the existing New Airport Way (A1081) to the new passenger terminal along with the provision of forecourt and car parking facilities;

¹ On 1 December 2021, the local planning authority (Luton Borough Council) resolved to grant permission for the current airport operator (LLAOL) to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa. However, the application was then called-in and referred to the Secretary of State for determination instead of being dealt with by the local planning authority, and an inquiry to consider the called-in application took place between Tuesday 27 September 2022 and Friday 18 November 2022. At the time the application for development consent was submitted, the outcome of the inquiry was still unknown and, therefore, all of the core assessment work undertaken for the application used a "baseline" of 18 mppa. The application by LLAOL has however since been approved, with a joint decision to grant planning permission issued by the Secretary of State for Transport and Secretary of State for Levelling Up, Housing and Communities on 13 October 2023. In anticipation of this, the Applicant's environmental assessments included sensitivity analysis of the implications of the permitted cap increasing to 19 mppa. As a result, the Applicant believes that the environmental assessments are sufficiently representative of the likely significant effects of expansion, whether the baseline is 18 mppa or 19 mppa. Where the change of the baseline does affect an assessment topic, in most cases it means that the 'core' assessments (using an 18 mppa baseline) report a marginally greater change than would be the case with a 19 mppa baseline. The findings of the assessment, including the sensitivity analysis, are presented in the Environmental Statement submitted with the application for development consent.

- g. Extension of the Luton Direct Air to Rail Transit (Luton DART) with a station serving the new passenger terminal;
 - h. Landscape and ecological improvements, including the replacement of existing open space; and
 - i. Further infrastructure enhancements and initiatives to support the target of achieving zero emission ground operations by 2040, with interventions to support carbon neutrality being delivered sooner including facilities for greater public transport usage, improved thermal efficiency, electric vehicle charging, on-site energy generation and storage, new aircraft fuel pipeline connection and storage facilities and sustainable surface and foul water management installations.
- 1.1.5 The majority of the land needed for the proposed expansion, including land needed to replace affected areas of Wigmore Valley Park, is owned or under the control of the Applicant or Luton Borough Council (LBC).
- 1.1.6 The proposed DCO will provide a mechanism for land and rights in land to be acquired by compulsion, with statutory compensation available to those affected. Entitlement and eligibility for statutory compensation is not covered in this Policy and readers are directed to the Guidance Booklets published by the Government (Ref. 1).
- 1.1.7 This document sets out discretionary Compensation Policies and Measures that will be an enhancement upon the statutory position and will be secured in a s106 agreement entered into by the Applicant similarly to how the existing noise insulation scheme is secured. In accordance with section 106 of the Town and Country Planning Act 1990, planning obligations secured in such an agreement are enforceable against the Applicant as the entity entering into such an agreement. A number of these proposals were refined following feedback during the 2019 statutory consultation and have been further refined following the 2022 statutory consultation.
- 1.1.8 In addition to Compensation Policies and Measures, this document also includes details of Community First, which is similarly secured in a s106 agreement. This is to enhance the distribution of the benefits of the proposals to local communities around the airport whilst tackling deprivation and decarbonisation.
- 1.1.9 The Compensation Policies and Measures will be available at different stages of the Proposed Development, with some available from when the application for development consent was accepted for examination, whilst others will be available once notice to grow under article 44(1) of the DCO is served.
- 1.1.10 The Noise Insulation Policy will continue to be available until all eligible owners have been contacted and offered the insulation and all those who responded positively have had the works that were offered under the policy, satisfactorily completed.
- 1.1.11 **Table 1.1** summarises the discretionary compensation that could be available for properties in different situations.

- 1.1.12 Information on the noise assessment undertaken as part of the Environmental Statement (ES) and terminology relating to noise levels and noise contours is provided in Appendix B.

Table 1.1: Indicative Guide to Discretionary Compensation

Property Type and Situation	Public Buildings inside the daytime air noise 63dBL _{Aeq,16h} Contour or night-time air noise 55dBL _{Aeq,8h} contours	Residential property inside the daytime air noise 66dBL _{Aeq,16h} or night-time air noise 63dBL _{Aeq,8h} contour	Residential property inside the daytime air noise 66dBL _{Aeq,16h} outside the daytime air noise 69dBL _{Aeq,16h} and night-time air noise 63dBL _{Aeq,8h} contours	Residential property inside the daytime air noise 60dBL _{Aeq,16h} contour and outside the daytime air noise 63dBL _{Aeq,16h} contour	Residential property inside the night-time air noise 55dBL _{Aeq,8h} contour	Residential property inside the daytime air noise 57dBL _{Aeq,16h} contour and outside the air noise 60dBL _{Aeq,16h} contour	Residential property inside the daytime 54dBL _{Aeq,16h} air noise contour and outside the air noise 57dBL _{Aeq,16h} contour	Habitable rooms in residential properties exposed to free-field ground noise levels in excess of 55dBL _{Aeq,16h} Bedrooms in residential properties exposed to free-field ground noise levels in excess of 45dBL _{Aeq,8h}	Residential properties where road traffic noise level of 63dBL _{Aeq,16h} or 55dBL _{Aeq,8h} and experience a noise increase of 1dB or more	
Discretionary Compensation	Public Buildings Noise Insulation Scheme	Voluntary Acquisition	Hardship Scheme	Noise Insulation Scheme 1	Noise Insulation Scheme 2	Noise Insulation Scheme 3	Noise Insulation Scheme 4	Noise Insulation Scheme 5	Ground Noise Insulation Scheme	Highway Noise Insulation Scheme
Details	Individual assessments will be made to provide up to a full package of noise insulation to habitable rooms, including bedrooms where primary activity of building has a residential function, with an expenditure cap of £250k per property	Owner can have their property acquired if they wish. Payment assessed in accordance with compulsory purchase code - unaffected market value plus other items such as disturbance and loss payment	Owner can have their property acquired if there is a compelling reason to sell but they have been unable to do so. In the absence of a sale, it would cause hardship. Offer will be made on an 'unaffected market value'. No additional payments made as property owner was looking to sell	A full package of noise insulation to habitable rooms, including bedrooms, living rooms, and dining rooms will be provided	A contribution of up to £20,000 for agreed noise insulation works to be undertaken to the property	A full package of noise insulation to bedrooms only will be provided	A contribution of up to £5,000 for agreed noise insulation works to be undertaken to the property	A contribution of up to £4,000 for agreed noise insulation works to be undertaken to the property	A contribution of up to £4,500 for agreed noise insulation works to be undertaken to the property	A full package of noise insulation to the facade of the property exposed to the highway noise
When does entitlement arise?	In accordance with the property eligibility criteria and roll out plan set out in this policy	From the DCO application being accepted by the Planning Inspectorate	From the DCO application being accepted by the Planning Inspectorate	In accordance with the property eligibility criteria and roll out plan set out in this policy	In accordance with the property eligibility criteria and roll out plan set out in this policy	In accordance with the property eligibility criteria and roll out plan set out in this policy	In accordance with the property eligibility criteria and roll out plan set out in this policy	In accordance with the property eligibility criteria and roll out plan set out in this policy	In accordance with the property eligibility criteria and roll out plan set out in this policy	Will be offered to coincide with completion of the works which modelling indicates exceedance of noise threshold
		Note: If owner does not utilise Voluntary Acquisition scheme, they will be eligible under Noise Insulation Scheme 1 when that opens	Note: If owner does not utilise Hardship Scheme, they will be eligible under Noise Insulation Scheme 1 when that opens							

2 STATUTORY COMPENSATION CLAIMS

- 2.1.1 Those affected by the Proposed Development may be eligible to make claims for compensation in accordance with the Compensation Code. These may include:
- a. Statutory Blight;
 - b. Reduction in property value under Part 1 of the Land Compensation Act 1973; and
 - c. Injurious affection caused by construction works under section 10 of the Compulsory Purchase Act 1965.
- 2.1.2 It is recommended that specialist advice is taken in respect of any compensation claim under the Compensation Code.
- 2.1.3 For further information on compensation please see Government guidance documents on compulsory purchase available online <https://www.gov.uk/government/publications/the-land-compensation-manual> (Ref. 2.1).
- 2.1.4 Additionally, the Royal Institution of Chartered Surveyors operates a customer helpline that can put people in touch with a firm in their area who offer up to 30 minutes free consultancy on compulsory purchase.

3 DISCRETIONARY MEASURES

- 3.1.1 The Applicant will introduce a range of discretionary compensation measures to support those most impacted by the Proposed Development. In most cases part of the eligibility criteria will require the property to fall within a specific noise contour area. The extent of a noise contour will depend on a number of factors including weather, the aircraft fleet mix (less noisy new generation aircraft cause noise contours to reduce in size) and the number of aircraft movements over the 92-day summer period², which is the busiest time of year for the airport. Noise contours will be updated regularly during the lifetime of the Proposed Development and as a result properties may move between Noise Insulation Schemes in the future.
- 3.1.2 The Applicant has used feedback received from consultation in shaping this policy. This is set out in detail in the **Consultation Report [TR020001/APP/6.01]** submitted with the application.
- 3.1.3 The discretionary measures that the Applicant will implement are:
- a. Voluntary Acquisition Policy;
 - b. Residential Hardship Policy;
 - c. Noise Insulation Policy; and
 - d. Business Assistance Policy

²16 June to 15 September inclusive

4 VOLUNTARY ACQUISITION POLICY

- 4.1.1 As part of the Proposed Development, the Applicant is introducing a discretionary voluntary acquisition policy to support eligible impacted local residents. When the policy was written, the assessment of noise effects from the Proposed Development was at an early stage, and mitigation measures such as the Noise Envelope were still under development. As a precautionary approach, the Applicant therefore introduced a discretionary voluntary acquisition policy for any residential properties exposed above the aircraft noise unacceptable adverse effect level (UAEL) of 69dBL_{Aeq,16h} during the daytime and 63dBL_{Aeq,8h} during the night-time.
- 4.1.2 An updated noise assessment has now been undertaken as part of the ES for the Proposed Development (see **Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.03]**) and there are clear noise control measures in place (see the Noise Envelope in the **Green Controlled Growth Explanatory Note [TR020001/APP/7.07]**) which will control noise effects to be no worse than those predicted in the ES. The outcome of this work indicates that no residential properties are exposed above the UAEL as a result of the Proposed Development.
- 4.1.3 However, rather than remove the scheme from the policy the Applicant has decided to leave it in place so that if circumstances were to change in a way not envisaged, then the policy will still be available to those who demonstrate the criteria is met. In principle, applications for voluntary acquisition could be submitted to the Applicant for consideration from any time after the proposed application for development consent is accepted by the Planning Inspectorate.
- 4.1.4 Under this policy if residential properties fall within the unacceptable adverse effect level (UAEL)³ noise contours, owners may prefer for the Applicant to acquire their property so that they can move elsewhere. The Applicant has maintained its originally proposed voluntary acquisition scheme for eligible properties in the aircraft air noise 69dBL_{Aeq,16h} and 63dBL_{Aeq,8h} UAEL noise contours area.
- 4.1.5 The Applicant does not currently envisage that any residential properties will be or would become impacted to this level.
- 4.1.6 Revised noise contour plans will be published every 5 years and applications can be made to the Applicant if properties are identified as being within the relevant contour at any time in the future.
- 4.1.7 Should eligible owners want the Applicant to buy their property under this policy an independent valuer will be appointed at the Applicant's cost to assess its open market value. The independent valuer will be selected by the owner from a panel of three Chartered Surveyors recommended by the Applicant.
- 4.1.8 All valuers recommended for the panel will be Chartered Surveyors registered with the Royal Institution of Chartered Surveyors (RICS) carefully selected to

³See Appendix B for further information on noise terminology

ensure they can demonstrate the competence and professional knowledge to undertake valuations.

- 4.1.9 The valuation will be based on the unaffected open market value (what would have been the value of the property without the Proposed Development).
- 4.1.10 An offer to acquire the property will be made at the level of the independent valuer's valuation.
- 4.1.11 In addition, the Applicant will reimburse reasonable costs associated with acquiring and moving to a new property, which could include payment of the stamp duty land tax for a replacement property of equivalent value, statutory home loss payment of 10% of the open market value (currently with a cap of £81,000, reflecting the statutory provision that is periodically updated as will the payment under this policy), reasonable conveyancing and agent's fees, and other disturbance elements such as removal costs. Such costs will be assessed in accordance with the Compensation Code, meaning participants in the scheme will receive payment as if their property had been compulsorily acquired.
- 4.1.12 Once an offer has been made, the Applicant will make the commitment to purchase the property under the policy although at the same time there will be no obligation for the homeowner to sell the property until exchange of contracts. The offer to acquire will remain open for acceptance for a period of six months from the date of the offer.

5 RESIDENTIAL HARDSHIP POLICY

- 5.1.1 As part of the Proposed Development, the Applicant will introduce a discretionary residential hardship scheme to protect the most impacted local residents. This discretionary property scheme is now available and has been since the proposed application for development consent was accepted for examination by the Planning Inspectorate on 27 March 2023.
- 5.1.2 The scheme is for qualifying residential properties in the aircraft air noise 66dBL_{Aeq,16h} daytime contour area and 60dBL_{Aeq,8h} night-time contour area. Owners of residential properties in these areas may ask the Applicant to acquire their property in circumstances whereby, should they be unable to sell on the open market, this would lead to exceptional hardship.
- 5.1.3 Indicative plans delineating the 66dBL_{Aeq,16h} and 60dBL_{Aeq,8h} noise contour areas can be found in the ES for the Proposed Development (see **Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.03]**).
- 5.1.4 Updated noise contour plans will be published every five years and applications can be made as soon as properties are identified as being within the relevant contour.
- 5.1.5 In order to qualify under the scheme, all the following criteria must be satisfied and evidenced:
- the property must be located within the 66dBL_{Aeq,16h} and/or 60dBL_{Aeq,8h} noise contours;
 - the owner must have made reasonable efforts to sell the property, such as by marketing the property for a reasonable period, and not having received an offer within 15% of a reasonable asking price. The reason a sale is not achieved must be attributable to the Proposed Development;
 - the owner must have had no prior knowledge of the Proposed Development (having acquired the property before October 2019); and
 - the owner must demonstrate a compelling need to sell the property and that they are currently, or soon will be, in a position of exceptional hardship and that the sale of the property would alleviate that hardship. Such hardship may, for example, originate from financial, health and disability, employment, family or domestic issues, a court settlement, or winding up a deceased estate. It is up to the owner to demonstrate and evidence a compelling need to sell the property and that exceptional hardship would be the result of a failure to sell the property, other than at a significantly reduced price.
- 5.1.6 Reasonable efforts to sell a property may be demonstrated by, for example, written evidence from the estate agent with which the property has been listed for sale about lack of interest being shown or feedback from prospective purchasers being put off because of the Proposed Development. The owner might also have tried reducing the asking price during the period of marketing to show how that interest in the property has been tested and why offers that may be received are below what the market would normally pay. These are only

examples and any evidence provided will be put before the decision makers who will judge each application on its merits.

- 5.1.7 Where there is a need to sell a property in the above circumstances, but the owner has not succeeded in doing so, the owner may apply to the Applicant to acquire the property under this policy. The Applicant will consider each individual application on its own merits. Each application will be referred to the Applicant's Board of Directors for consideration.
- 5.1.8 If the Board of Directors determine that the criteria have been met then they will make an offer to acquire the property. An independent valuer will be appointed to assess its value, based on unaffected open market value (what would have been the value of the property without the Proposed Development). An offer to acquire the property will be made at the level of this independent valuation.
- 5.1.9 The independent valuer will be selected by the owner from a panel of three Chartered Surveyors recommended and pre-procured by the Applicant. All valuers recommended for the panel will be Chartered Surveyors registered with the Royal Institution of Chartered Surveyors (RICS) and will be carefully selected to ensure they can demonstrate the competence and professional knowledge to undertake valuations.
- 5.1.10 Under this scheme, the offer will not include additional costs, such as agent's and legal fees or removal costs, on the grounds that if the owner was already looking to sell the property they would normally expect to have to meet these costs anyway.
- 5.1.11 The Applicant will seek to determine applications within two months of receiving a claim.
- 5.1.12 Once an offer has been made the Applicant will make the commitment to purchase the property under the policy although at the same time there will be no obligation for the homeowner to sell the property until exchange of contracts. The offer to acquire will remain open for acceptance for a period of six months from the date of the offer.

6 NOISE INSULATION POLICY

- 6.1.1 The airport operator currently operates a Noise Insulation Scheme. The scheme provides funding for a range of measures to compensate for the impact of noise on properties within a defined noise contour.
- 6.1.2 The Applicant recognises that even after applying best practice in the design of the Proposed Development and introducing necessary mitigation measures, some local people are still likely to be negatively affected by noise. Therefore, as part of the Proposed Development, the Applicant will improve the current Noise Insulation Scheme to eligible local homes, in order to mitigate for the effects of noise for those most affected.
- 6.1.3 The new Noise Insulation Schemes have been designed to significantly improve on the current Noise Insulation Scheme not only by increasing the number of properties which may be eligible under the new schemes but also by improving the level of contribution offered. The new schemes described in the remainder of this part of the document will apply once the Applicant has served notice on Luton Borough Council under article 44(1) of the DCO.
- 6.1.4 Insulation work will be offered through five Air Noise Insulation Schemes (plus a ground noise scheme and highways scheme – see later sections), with each scheme addressing slightly different circumstances:
- a. Air Noise Scheme 1 – Properties inside the daytime 63dBL_{Aeq,16h} contour;
 - b. Air Noise Scheme 2 – Properties inside the daytime 60dBL_{Aeq,16h} contour and outside the daytime 63dBL_{Aeq,16h} contour
 - c. Air Noise Scheme 3 – Properties inside the night-time 55dBL_{Aeq,8h} contour
 - d. Air Noise Scheme 4 – Properties inside the daytime 57dBL_{Aeq,16h} contour and outside the daytime 60dBL_{Aeq,16h} contour; and
 - e. Air Noise Scheme 5 – Properties inside the daytime 54dBL_{Aeq,16h} contour and outside the daytime 57dBL_{Aeq,16h} contour.
- 6.1.5 In their December 2018 consultation 'Aviation 2050: The future of UK Aviation'⁴ the Government consulted on extending the noise insulation policy threshold beyond the current 63dBL_{Aeq,16h} contour to 60dBL_{Aeq,16h}. In line with this proposed policy change the Applicant has extended the noise insulation policy threshold beyond the current 63dBL_{Aeq,16h} contour. The proposals provide eligibility from 54dBL_{Aeq,16h} and include the night-time 55dBL_{Aeq,8h} to determine properties exposed to significant observable adverse effects.
- 6.1.6 The proposals when implemented will replace the existing scheme.

⁴ Aviation 2050: The Future of UK Aviation - A consultation by the Department for Transport seeking feedback on its green paper which outlines proposals for a new aviation strategy. The strategy will set out the challenges and opportunities for aviation to 2050 and beyond and will emphasise the significance of aviation to the UK economy and regional growth. Details can be found on the Gov.uk website including the Government's response to the consultation.

- 6.1.7 As part of the Proposed Development's **Green Controlled Growth Framework [TR020001/APP/7.08]**, the contour updates will be extended to include five year forecasts to aid in driving an increase in the quietest aircraft using the airport as it grows, and also to plan for the roll out of the new Noise Insulation Scheme. At these five yearly intervals, the fixed contributions towards noise insulation will be reviewed to reflect inflation and updated as appropriate.

Air Noise Scheme 1 – Properties inside the daytime 63dBL_{Aeq,16h} contour band

- 6.1.8 A full package of noise insulation to habitable rooms, including bedrooms, living rooms, dining rooms and any outbuildings in residential use (not sheds or garages etc) will be provided. Typical measures are set out below but needs are likely to vary at different properties.
- This may include kitchen/diners but does not include toilets, bathrooms, porches, conservatories, outbuildings and rooms used solely for leisure activities.
 - Windows may be upgraded to acoustic double glazing or by the addition of secondary glazing.
 - External doors to habitable rooms may be upgraded.
 - Ceilings or lofts may be over-boarded with additional lining.
 - Acoustic thermal insulation may be installed above ceilings in lofts.
 - Suitable ventilation may be provided so that windows can be kept closed in warm weather.

Air Noise Scheme 2 – Properties within the 60dBL_{Aeq,16h} contour band and outside the 63dBL_{Aeq,16h} contour band

- 6.1.9 Scheme 2 will provide homes with a contribution of up to £20,000 for agreed noise insulation works to be undertaken to the property.

Air Noise Scheme 3 – Properties within the night-time 55dBL_{Aeq,8h} contour band

- 6.1.10 Scheme 3 provides the following:
- A full package of noise insulation to bedrooms only will be provided. Typical measures are set out below but needs are likely to vary at different properties.
 - Windows may be upgraded to acoustic double glazing or by the addition of secondary glazing.
 - Ceilings or lofts may be over-boarded with additional lining. Acoustic thermal insulation may be installed above ceilings in lofts. Suitable ventilation may be provided so that windows can be kept closed in warm weather.

Air Noise Scheme 4 – Properties within the 57dBL_{Aeq,16h} contour band and outside the 60dBL_{Aeq,16h} contour band

- 6.1.11 Scheme 4 will provide:

- a. a contribution of up to £6,000 for agreed noise insulation works to be undertaken to the property.

Air Noise Scheme 5 – Properties within the 54dBL_{Aeq,16h} contour band and outside the 57dBL_{Aeq,16h} contour band

6.1.12 Scheme 5 will provide:

- a. a contribution of up to £4,000 for agreed noise insulation works to be undertaken to the property.

Air noise schemes eligibility

- 6.1.13 Should consent for the Proposed Development be approved the existing scheme will continue to apply until the Applicant serves notice on Luton Borough Council under article 44(1) of the DCO.
- 6.1.14 Following such notice, the new Noise Insulation Scheme will be progressively rolled out to homes forecast to be within the relevant noise contours as a result of growth in air traffic movements from the Proposed Development. The roll out plan will prioritise the most affected properties within the latest 63dBL_{Aeq,16h} and 55dBL_{Aeq,8h} contours and introduce each scheme as efforts to insulate those in worst affected contours are complete.
- 6.1.15 Updated air noise contour forecasts will be published as part of the Green Controlled Growth five year forecasts based on the most accurate information available at the time (see **Green Controlled Growth Explanatory Note [TR020001/APP/7.07]**). It is these contours which will determine eligibility for the Air Noise Insulation Schemes outlined above. For example, if at any time in the future a noise contour forecast is published that shows a property is expected to fall within either the daytime 63dB, 60dB, 57dB, or 54dB contour bands, or the night-time 55dB contour band, that property will be eligible for the relevant scheme.
- 6.1.16 The Policy will apply to properties built and occupied prior to 16 October 2019, being the date Statutory Consultation commenced for the Proposed Development. This date may be lifted for those able to demonstrate that they could not reasonably have known about the Proposed Development at the time, or that the application for planning consent to build their property pre-dated 16 October 2019 and as such the housebuilder could not reasonably have known about the Proposed Development at the time.
- 6.1.17 Where the owner qualifies for more than one air noise scheme under the noise insulation policy, this will be made clear to the owner and they will be given the option as to which scheme they want to apply under.

Listed Buildings

- 6.1.18 Residential properties which are listed buildings qualify for all the schemes set out in this document in the same way that other residential properties do, with the same benefits. The Applicant recognises that in circumstances where the property is listed there may be a need for listed building consent prior to installation of any insulation works provided under the Policy. The homeowner

will be responsible for securing this consent and in dealing with any conditions which are to be applied (monitoring/approvals etc). As the process above cannot apply to a listed building the Applicant commits to follow the process insofar as is reasonably practicable after consent is obtained.

- 6.1.19 To assist with the additional planning fees and related costs associated with securing listed building consent homeowners faced with this additional step will be eligible for a payment being a contribution towards those costs, reasonably and properly incurred, up to a maximum of £2,500. Once the homeowner has accepted the offer, the Applicant will advance funds where required to enable the homeowner to apply for and secure the consent. Once the consent is obtained the 30-day acceptance window will restart.
- 6.1.20 The Applicant will require its installation contractors to offer a range of products including those suitable for listed buildings and work with listed building homeowners on a case-by-case basis so as to enable identified impacts to be mitigated where possible.

Community Buildings

- 6.1.21 The Applicant will offer acoustic insulation to other noise-sensitive community buildings lying within the air noise or ground noise 63dBL_{Aeq,16h} and should those buildings be regularly occupied at night also for those within the air noise or ground noise 55dBL_{Aeq,8h} contours. These buildings may include:
- a. Schools and colleges;
 - b. Doctors' surgeries, health centres, hospitals, nursing homes and care homes;
 - c. Libraries, community centres (unless only used as social clubs), meeting halls and village halls;
 - d. Churches and other places of religious worship; and
 - e. Children's and other day centres, crèches and nurseries.
- 6.1.22 The Noise Insulation Sub-Committee of London Luton Airport Consultative Committee ("LLACC") will be provided the data on eligible community buildings and will determine those that are to be prioritised for insulation in accordance with the roll out plan. Draft Terms of Reference for the Noise Insulation Sub-Committee are outlined in Appendix C.
- 6.1.23 The airport operator will then write to eligible property owners to invite them to apply for the scheme. On acceptance of the invitation to participate, a survey will be carried out to determine the scope of works required.
- 6.1.24 This scheme will be subject to a capped contribution of £250,000 per applicant per building or group of buildings in the same occupation and location. As per the residential schemes, owners may seek to agree with the contractor to include additional works beyond the scope and contribution level of this scheme, but the costs and any other responsibilities arising from such works must be borne by the owner.

Ground noise

- 6.1.25 The ground noise insulation scheme will apply to:
- Habitable rooms in residential properties exposed to free-field ground noise levels in excess of 55dBL_{Aeq,16h}; and
 - Bedrooms in residential properties exposed to free-field ground noise levels in excess of 45dBL_{Aeq,8h}.
- 6.1.26 The insulation scheme will apply to rooms (as defined above) with windows in the elevation(s) of the property exposed to the ground noise source.
- 6.1.27 Each year, eligibility will be determined by modelling of ground noise from actual aircraft movements at the airport for the summer period (16 June to 15 September) in the immediately preceding calendar year. The approach to ground noise modelling for the noise insulation scheme will be agreed in writing with Luton Borough Council.
- 6.1.28 The ground noise insulation scheme will provide a contribution of up to £4,500 for agreed noise insulation works to be undertaken to the property.
- 6.1.29 Where a property qualifies for both an aircraft noise and ground noise scheme this will be made clear to the owner and they will be given the option as to which scheme they want to apply under.

Highways

- 6.1.30 The assessment of noise from the Proposed Development presented in **Chapter 16 Noise and Vibration** of the **ES [TR020001/APP/5.01]** has identified the potential for indirect significant adverse effects for specific properties on Crawley Green Road due to intensification of road traffic using existing public highways at existing high noise levels. As works are completed, the Applicant will monitor traffic volumes near these specific properties and use this information to update the road traffic noise modelling and assessment of significant effects for these properties. Should this updated assessment confirm the identification of significant effects, then noise Insulation will be provided. For the purpose of this assessment, significant effects will be identified at these properties if they exceed a road traffic noise level of 63dBL_{Aeq,16h} or 55dBL_{Aeq,8h} and experience a noise increase between the without development scenario (the Do-Minimum) and the with development scenario (Do-Something) of 1dB or more.
- 6.1.31 To support this updated assessment, monitoring of airport trips will be undertaken on an annual basis with wider traffic surveys undertaken every five years to provide the information required to undertake forecast surface access noise modelling up to five years into the future at properties where an indirect significant adverse effect above SOAEL has been identified in **Chapter 16 Noise and Vibration** of the **ES [TR020001/APP/5.01]** (Crawley Green Road). To account for any potential atypical night-time flows, the monitoring will collect sufficient data for Transport Research Laboratory Method 1 (Ref. 6.1) to be employed for the stretch of Crawley Green Road from Vauxhall Way to Hedley Rise. This traffic monitoring and noise remodelling will be used to identify

eligibility for noise insulation if required. The traffic monitoring will use data collected as part of the TRIMMA process (set out in the **Outline Transport Related Impacts Monitoring and Mitigation Approach [TR020001/APP/8.97]**). Any material changes to approach will be undertaken in consultation with Luton Borough Council. Further information on this process of reassessment is provided in Section 4.2 of **Appendix 16.2 Operational Noise Management Explanatory Note of the ES [TR020001/APP/5.02]**.

- 6.1.32 For properties in which a significant effect is confirmed through updated modelling described above, a package of noise insulation to habitable rooms, including bedrooms, living rooms, and dining rooms with windows in the elevation(s) of the property exposed to the noise source will be provided.

Testing of insulation schemes

- 6.1.33 Should consent for the Proposed Development be given, the Applicant will develop a rolling testing policy for the noise insulation schemes, with the details of the policy to be developed within six months of the Applicant serving notice on Luton Borough Council under article 44(1) of the DCO. The testing policy will be developed in consultation with the Noise Insulation Sub-Committee of LLACC and having regard to best practice such as that published by the Independent Commission on Civil Aviation Noise (ICCAN, Ref. 6.2).
- 6.1.34 The testing policy will be proportionate, based on a sample of residential and community buildings, and will be used to monitor and as necessary improve the quality control of the scheme going forward.
- 6.1.35 The testing policy is expected to contain, as a minimum:
- a. proportionate sampling strategy with a combination of representative testing of a sample of properties of similar building type and testing of individual unique building types;
 - b. testing of sound insulation performance in accordance with British Standard BS EN ISO 16283-3 (Ref 6.), or other relevant standards as agreed with the Noise Insulation Sub-Committee of LLACC, before and after completed installation of an insulation package; and
 - c. quantification and reporting of the sound reduction performance of the insulation package; and commentary on the implications (if any) of the measured sound reduction performance on the quality control and improvement of the scheme going forward.

Process

- 6.1.36 The Applicant is committed to the following process immediately on the introduction of this policy so that noise insulation is offered and can be in place as fast as reasonably practicable.
- 6.1.37 The Applicant will prepare a roll out plan setting out the timetable for operating the noise insulation scheme that will be approved by the relevant planning authority, Luton Borough Council. The initial roll out plan will set out a target timetable for the delivery of the programme of insulation including the planned

numbers of homes to be insulated each year⁵. The plan will demonstrate how the Applicant intends to deliver insulation to all those eligible, who accept an offer, within four years of serving the article 44(1) notice.

- 6.1.38 Prior to being put forward for the approval of Luton Borough Council it will be consulted on with the Noise Insulation Sub-Committee of LLACC. Draft Terms of Reference for the Sub-Committee are outlined in Appendix C. The roll out plan will need to be approved by Luton Borough Council prior to article 44(1) notice being served.
- 6.1.39 At any time, the Applicant will be able to apply to Luton Borough Council to update or vary the roll out plan, following consultation with the Noise Insulation Sub-Committee of LLACC.
- 6.1.40 In order to ensure successful delivery of the scheme, the Noise Insulation Sub-Committee of LLACC will be provided, upon the implementation of the scheme and thereafter annually, with the data on all eligible properties under the scheme. The Noise Insulation Sub-Committee of LLACC will determine the priority areas for noise insulation for the forthcoming year based on those most significantly impacted and other guidance from the Applicant covering eligibility criteria, commitments it has made to deliver the mitigation and the efforts it expects to be made to put works in place quickly.
- 6.1.41 In order to monitor the effectiveness of the scheme the Applicant will provide the Noise Insulation Sub-Committee of LLACC with an annual report summarising the number of households invited to claim under the scheme, the number of formal acceptances in the preceding 12 months, the number of properties where the identified works have been approved and the number where those relevant approved works have been completed pursuant to the scheme. The report will also explain any delays that have been encountered, the reasons for them and steps proposed to be taken by the Applicant to minimise any future delays.
- 6.1.42 The first annual report will cover the first year period of operation up to the 31 December of the year in which the article 44(1) notice was served of the scheme and be provided to the Noise Insulation Sub-Committee of LLACC no later than two months following the end of that year. Subsequent annual reports will be provided to the Noise Insulation Sub-Committee of LLACC within two months of the end of the year in question.
- 6.1.43 The Applicant commits to maintaining the existing Noise Insulation Sub-Committee of LLACC, or an equivalent thereof, until all eligible properties who have asked for insulation have got it. The Applicant will write to all eligible property owners and occupiers in the areas identified by the Noise Insulation Sub-Committee of LLACC and others in accordance with the above-mentioned roll out plan for the period in question to invite property owners to apply for the relevant scheme. On receipt of this invitation the homeowner may confirm whether they would in principle like noise insulation. The Applicant will then

⁵ For the avoidance of doubt, it should be noted that the delivery of insulation is dependent upon a homeowner deciding to apply for insulation in accordance with the process set out in this section of this document.

arrange for a pre-procured contractor to visit the property with a view to preparing a schedule of noise mitigation measures according to the scheme for which the property qualifies.

- 6.1.44 Where the owner qualifies for more than one scheme under the noise insulation policy, this will be made clear to the owner and they will be given the option as to which scheme they want to apply under. The exception to this would be for properties which qualify for the highways and ground noise insulation schemes from different facades. In such circumstances the property owner would be eligible for both schemes.
- 6.1.45 The homeowner will receive a copy of the contractor's scope and specification of work and will have the opportunity to review it and request changes which may be made but where such changes increase the cost of works above the contribution level of the Noise Insulation Scheme, this additional cost must be borne by the homeowner. For Schemes 1 and 3 which provide for a full package of noise insulation works, homeowners will have the option of an appeal to the Noise Insulation Sub-Committee of LLACC where dissatisfied with the specification of work. Any appeals will be dealt with promptly by the Noise Insulation Sub-Committee of LLACC and in any event within 3 months of an evidenced submission.
- 6.1.46 When the specification for works has been approved by the homeowner, a date for installation will be agreed with the homeowner and the work scheduled for completion.
- 6.1.47 On completion, the airport operator will make a direct payment to the contractor for the authorised works necessary to fulfil the policy leaving any additional sum to be paid by the homeowner.
- 6.1.48 Over time there are anticipated to be circumstances where properties become eligible for different schemes. Should this arise, the Applicant will recognise eligibility for the scheme most relevant at the time of the contractor's visit to the property and in any subsequent offer for noise insulation reserve the right to reflect any previous noise insulation compensation contributions already made.
- 6.1.49 During transition from the scheme run by the airport operator in advance of the scheme described in this policy to the scheme set out in this document, all accepted applications under the existing scheme will be completed in accordance with that scheme. This will not preclude any such properties being identified and further offered insulation under the roll out of the new scheme save that works completed under the existing scheme will be reflected in the subsequent assessment survey.
- 6.1.50 A proactive approach will be adopted by the Applicant to ensure both knowledge and availability of the offer has been clearly and openly communicated. To assist homeowners, the Applicant will make available an online 'look up' tool which homeowners can interact with to establish which scheme or schemes their property will be eligible for when the offer is made, based on the latest published contours. The tool will be available from the date the airport operator serves notice on the relevant planning authority under article 44(1) of the DCO.

- 6.1.51 On implementation of the new scheme the Applicant will take all reasonable steps to roll out the offer of noise insulation in accordance with the roll out plan. This will include the appointment by the Applicant of multiple contractors so that capacity and capability is made available to deliver the insulation in an efficient and effective manner.
- 6.1.52 The offer to homeowners made by the Applicant will be supported by a multi-stage programme that is designed to promote awareness of the scheme and encourage acceptance. Each recipient of the offer will be given 30-days to respond to the letter. There will be local publicity using a range of measures that may include door knocking, banners, leaflets etc.
- 6.1.53 On response, the Applicant will provide details to its procured contractor who will aim to contact the homeowner within one week to make an appointment. The contractor will then aim to schedule the appointment within a further two weeks.
- 6.1.54 The contractor will then confirm which rooms are eligible for the insulation and work with the homeowner to identify the most suitable insulation within the cost that will be covered by the scheme.
- 6.1.55 After the meeting, the contractor will issue a quote to the homeowner with confirmation of the rooms to be covered and a requirement for the homeowner to respond within four weeks.
- 6.1.56 On receipt of an acceptance, as soon as reasonably practicable the contractor will arrange a manufacturers survey to be carried out to finalise the measurements before manufacture. Manufacturing is then typically expected to take six weeks from date of order.
- 6.1.57 The Applicant will require the contractor to manage and operate a complaints procedure for those who accept the invitation to participate and are dissatisfied with their experience of the process. The Applicant will use information from the complaints procedure to monitor the performance of the contractors.
- 6.1.58 To further support the promotion and administration of the scheme, tenants and occupiers will receive letters and be invited to initiate the application with implementation subject to landlord approval. Local letting agents will be contacted for them to contact property owners if they have eligible properties on file to ensure landlords are also made aware of the scheme.
- 6.1.59 Support will be provided by the Applicant for households who do not have English as a main language, have low literacy or where there are particular vulnerabilities due to age, disability or poor health. The process will include safeguarding and clear communication protocols for surveys and works in the homes of vulnerable persons.
- 6.1.60 LLACC has no executive role in the decision-making process of the airport. The aim of LLACC is to ensure that as wide a range of views as possible is made available to the London Luton Airport management team so that they can take account of the issues which are of concern to those using the airport, working at it or living around it. The chairman of LLACC is appointed by London Luton Airport Operations Limited (LLAOL) but is independent of the airport and the

other bodies on LLACC. It will be the Noise Insulation Sub-Committee of LLACC engaged in connection with the Noise Insulation Scheme. Until this new policy is live the existing Noise Insulation Scheme will continue to apply.

7 SUPPORTING BUSINESS RELOCATION

- 7.1.1 The purpose of this section is to set out what the Applicant will do to support businesses in the small number of cases where the relocation of existing businesses will be required to enable delivery of the Proposed Development.
- 7.1.2 The statutory position is, once the Applicant has consent, it may serve a notice of either 14-days for temporary possession or three months for permanent acquisition to require the owner or occupier to vacate with compensation being assessed afterwards based on the submission of a claim.
- 7.1.3 The compulsory acquisition process places a duty on affected parties to mitigate losses and steps should be taken by businesses to achieve this. This will include relocating existing businesses where it is reasonably possible. The Applicant anticipates that in the majority of cases businesses will be able to obtain statutory compensation to relocate their operations.
- 7.1.4 Depending on the specific circumstances of the individual business in question, the Applicant will consider a range of potential support measures. The Applicant's proposals are designed to provide flexibility and greater certainty for future business planning and go beyond statutory requirements. It should be noted that these options are not mutually exclusive and do not represent all possible assistance that could be available:
- a. agreeing terms for an acquisition in advance of our requirements so that the business is able to relocate at a suitable time. This could either be on the basis that a price is agreed at the time the agreement is signed, or that a mechanism is agreed for reaching that price;
 - b. agreeing to allow a lease to be surrendered (either when the agreement is signed or at a defined point in the future) to facilitate relocation; and/or
 - c. agreeing an arrangement for an extended notice period to be given before the property is acquired.

8 COMMUNITY FIRST

- 8.1.1 The Applicant seeks to contribute to the stated goals of its shareholder Luton Council, in its Luton 2040 Vision⁶ to be carbon neutral and to eliminate poverty in the town by 2040.
- 8.1.2 The Applicant considers that the most appropriate way to achieve this is by optimising the social and economic power of the town's largest asset, the airport, whilst growing in a way which supports the Luton 2040 Vision target of being a carbon neutral town by 2040.
- 8.1.3 **The Need Case [TR020001/APP/7.04], Green Controlled Growth Explanatory Note [TR020001/APP/7.07], Employment and Training Strategy [TR020001/APP/7.05]** and other measures included within this application for development consent, set out how growth of the airport can directly contribute to these goals.
- 8.1.4 As the custodian of a community airport, the Applicant is committed to ensuring that the benefits arising from its ownership of the airport are shared with nearby communities. Over the last 20 years, the Applicant has contributed more than £175m to local community groups and charities providing vital services across neighbouring communities. Through Community First, the Applicant aims to tie together its commitment to sharing the benefits of airport growth with its neighbours and its commitment to contributing to the Luton 2040 Vision.
- 8.1.5 Away from the direct contribution made by the growth of the airport, the Applicant will further support indirect contributions, beyond those provided directly through airport growth, to meeting these goals. It will do so through the introduction of a new funding stream, Community First, which is aimed at providing grant funding to local organisations to assist with delivery of interventions which address the objectives of tackling deprivation and achieving carbon neutrality by 2040.
- 8.1.6 The Applicant has a long history of providing significant contributions directly to local community causes and continues to invest in this important aspect of its operation, even maintaining significant levels of community funding throughout the Covid-19 pandemic when incomes were devastated across the aviation industry. In 2019, the last comparable pre Covid-19 year, this was at a rate equivalent to more than £0.50 per passenger. The Applicant's community funding programme outside of Community First will continue and remain unaffected by Community First.

Funding Community First

- 8.1.7 Community First will be provided at a fixed rate of £1 of funding for every additional passenger above the planning cap current at the time that the Order is made, per year, resulting in up to £13m per year by the time the airport reaches a throughput of 32 mppa. This will take effect from the year in which passengers first exceed the planning cap current at the time the DCO is made.

⁶ A town-wide vision for Luton 2020-2040, *A place to thrive* sets out Luton Borough Council's priorities for the 20-year period to 2040

- 8.1.8 Community First will be funded through additional revenues to the Applicant resulting directly from expansion. There will be no direct impact on charges at the airport to fund Community First.
- 8.1.9 Community First contributions will be based on passenger numbers each calendar year. The passenger numbers in each year influence the Community First budget in the following grant year. Grant years will run from April to March. For example, assuming passenger numbers for January to December 2027 are 21.5 mppa then £2.5m (reflecting the difference between 19 mppa and 21.5 mppa) will be made available for Community First in the following grant year (April 2028 to March 2029). This will begin from the first year in which passenger throughput exceeds the current planning cap. In circumstances where there are unallocated funds at the end of a grant year those funds will be carried forward into the following year.

9 ELIGIBILITY

Geographical area - the Community First zone

- 9.1.1 The Applicant wishes to share the benefits of airport growth with neighbouring communities. A number of factors have been considered in determining the extent of the geographical area to be covered by Community First, including historical data on the location of complaints received about airport operations, flight paths, areas containing higher levels of social deprivation and consideration of optimising a balance between an area large enough to be confident that all Community First funds should be capable of being used but not so wide that it dilutes the effectiveness of the fund in meeting its objectives.
- 9.1.2 Consequently, the Community First zone includes the entirety of the county of Bedfordshire, including Luton, the entirety of the Hertfordshire districts of Stevenage, Welwyn and Hatfield, the City and District of St Albans, and Dacorum; those parts of the districts of North Hertfordshire and East Hertfordshire west of the A10; and eastern parts of Buckinghamshire.
- 9.1.3 Where the boundary of the Community First zone runs along a road, the entirety of any settlement severed by that boundary will be deemed to be eligible. The Community First zone is shown in **Figure 9.1**.

Fund availability

- 9.1.4 To ensure that benefits of airport growth are shared across the local area, 40% of the proceeds of Community First will be allocated to areas outside of the boundary of the Borough of Luton and 60% allocated for use within the boundary of the Borough of Luton. This is in recognition of the relatively higher incidence of social deprivation in the town.
- 9.1.5 Registered charities, community groups with their own bank account, parish councils and town councils within the Community First zone will be eligible to apply for grants.



Figure 9.1: Community First zone

10 ADMINISTRATION

- 10.1.1 The Applicant will appoint a charitable body independent of the Applicant to administer Community First.
- 10.1.2 The independent administrator will establish an awards panel to determine applications for grant funding and make awards. The independent administrator will be required to demonstrate that membership of award panels includes knowledge and understanding of matters of local interest and priority in the areas in which applications are being considered.
- 10.1.3 Grant applications must demonstrate a clear link to projects within the Community First zone which make a positive contribution to one of the core themes of Community First: either supporting decarbonisation or tackling deprivation.
- 10.1.4 In order to provide maximum flexibility for the independent administrator to exercise discretion in the award of grants, no additional criteria are set as to what constitutes a project tackling deprivation or decarbonisation. Provided that grant awards demonstrably meet one of the core themes of Community First, the independent administrator will have discretion to award grants wholly on merit.
- 10.1.5 The maximum level of any single grant award will be limited to £25,000 in any one grant year.

11 REVIEW

- 11.1.1 Community First is an ongoing commitment but will be subject to periodic review to ensure that it remains relevant and up to date as time progresses.
- 11.1.2 Reviews will take place at intervals not exceeding five years, to ensure that the fund remains relevant and effective.
- 11.1.3 Reviews of Community First may consider:
- a. the purposes for which funding is made available;
 - b. changes to the list of eligible beneficiaries (but not the removal of any of the eligible beneficiaries included in this document);
 - c. prioritisation of specific themes, beneficiary type, or geographical location within the current criteria;
 - d. geographical area of the Community First zone, beyond the boundary of the Borough of Luton;
 - e. maximum level of a single grant; and
 - f. upwards indexation of the value of the amount per passenger allocated to Community First.
- 11.1.4 The independent administrator of Community First will conduct reviews and make recommendations to the Board of Directors of London Luton Airport Limited for approval.
- 11.1.5 Any changes resulting from a review will be implemented from the beginning of the first financial year commencing after the changes are approved.

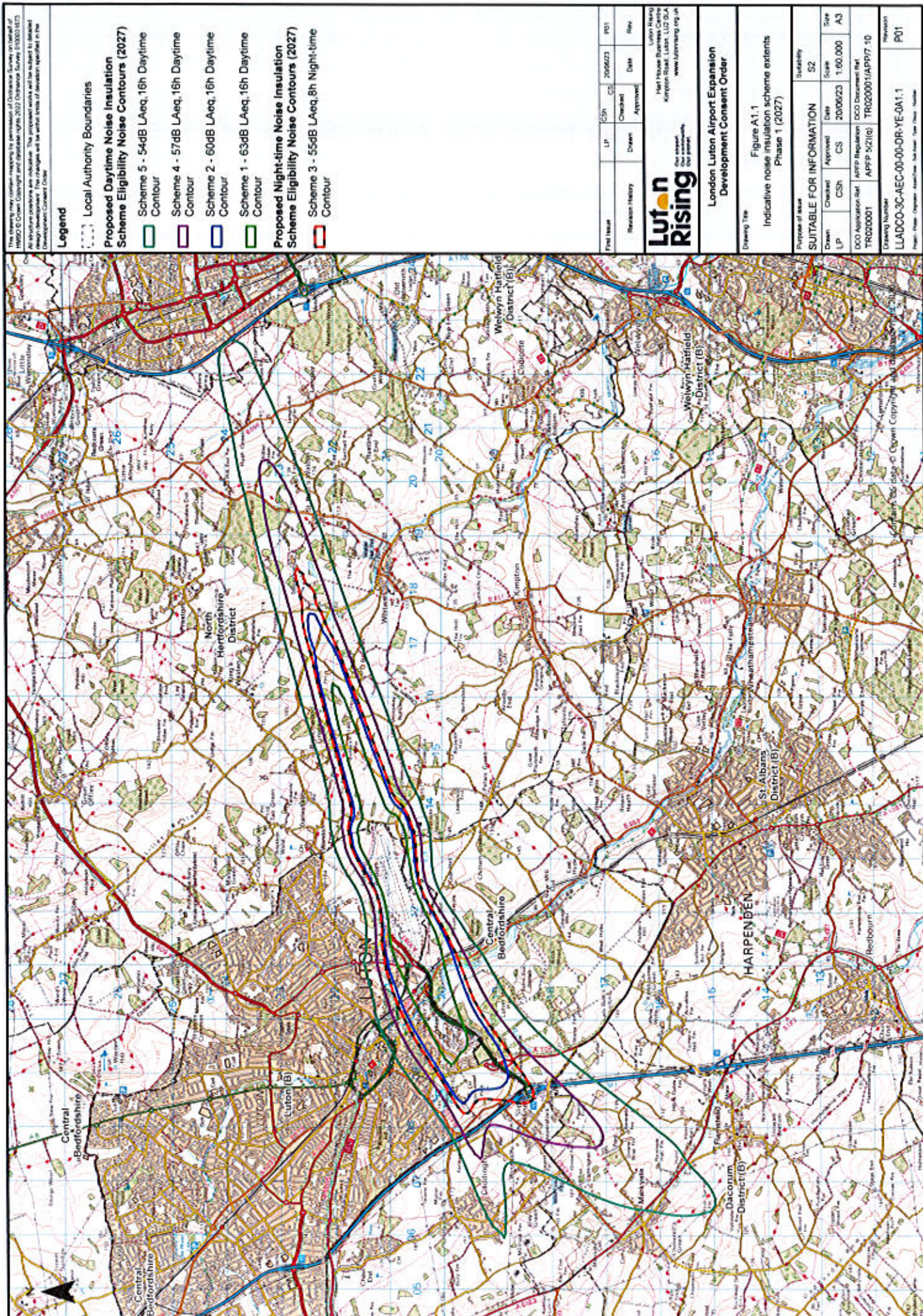
APPENDIX A – INDICATIVE NOISE CONTOUR PLANS

Appendix A - Indicative Noise Contour Plans

A1.1 Indicative noise contour plans

- A1.1.1 Figures A1.1 to A1.3 of Appendix A Part 1 present indicative plans representing the potential extent of the proposed noise insulation schemes using the forecast noise contours from **Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]**.
- A1.1.2 A second set of indicative plans (A1.4 to A1.9) is provided in Appendix A Part 2, showing the potential extent of the proposed noise insulation schemes overlaid with the extent of the current noise insulation schemes. Due to the number of different schemes (current and proposed), this second set of plans has been separated by daytime and night-time.
- A1.1.3 It should be noted that contours representing the potential extent of the proposed schemes and the extent of the current eligibility cannot be directly compared. This is because:
- a. the potential extent of the proposed schemes represent noise exposure in a forecast year (either 2027, 2039 or 2043) and the current scheme is based on noise exposure in 2023; and
 - b. the current noise insulation scheme extent is determined by modelling using the Integrated Noise Model (INM), whereas the potential extent of the proposed schemes is determined by modelling using the Aviation Environment Design Tool (AEDT). For further information on the differences between these two noise models, see **Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]**.
- A1.1.4 As these plans are for indicative purposes only, and are based on forecast noise contours, inclusion within the boundary of the plans does not definitively mean that a property would be eligible for noise insulation under the proposed scheme. Similarly, being outside of the boundary of the plan does not definitively mean that a property would not be eligible.

FIGURE A1.1 – INDICATIVE NOISE INSULATION SCHEME EXTENTS, PHASE 1 (2027)



<p>This drawing may contain references to information of Confidentiality in relation to the Luton Airport Expansion Development Consent Order. All information is confidential and its disclosure is prohibited. The project works will be subject to detailed design development. The changes will be within limits of deviation specified in the Development Consent Order.</p>		<p>Legend</p> <p>Local Authority Boundaries</p> <p>Proposed Daytime Noise Insulation Scheme Eligibility Noise Contours (2027)</p> <p>Scheme 5 - 54dB LAeq, 16h Daytime Contour</p> <p>Scheme 4 - 57dB LAeq, 16h Daytime Contour</p> <p>Scheme 2 - 60dB LAeq, 16h Daytime Contour</p> <p>Scheme 1 - 63dB LAeq, 16h Daytime Contour</p> <p>Proposed Night-time Noise Insulation Scheme Eligibility Noise Contours (2027)</p> <p>Scheme 3 - 55dB LAeq, 8h Night-time Contour</p>		<p>First Issue</p> <p>LP</p> <p>CS</p> <p>CS</p> <p>2006/23</p> <p>P01</p>
<p>Luton Rising</p> <p>Our vision, our ambition, our future.</p> <p>www.lutonrising.org.uk</p>		<p>Revision History</p> <p>Drawn</p> <p>Approved</p> <p>Date</p> <p>Rev</p>		<p>Project Name</p> <p>Luton Airport Expansion Development Consent Order</p>
<p>Figure A1.1</p> <p>Indicative noise insulation scheme extents</p> <p>Phase 1 (2027)</p>		<p>Drawing Title</p> <p>Figure A1.1</p> <p>Indicative noise insulation scheme extents</p> <p>Phase 1 (2027)</p>		<p>Project Name</p> <p>Luton Airport Expansion Development Consent Order</p>
<p>Purpose of Issue</p> <p>S2</p>		<p>Suitable for Information</p> <p>S2</p>		<p>Project Name</p> <p>Luton Airport Expansion Development Consent Order</p>
<p>Drawn</p> <p>CS</p> <p>2006/23</p> <p>1:60,000</p> <p>A3</p>		<p>Approved</p> <p>CS</p> <p>2006/23</p> <p>1:60,000</p> <p>A3</p>		<p>Project Name</p> <p>Luton Airport Expansion Development Consent Order</p>
<p>TR020001</p> <p>APP7-5210</p> <p>TR020001/APP7-10</p>		<p>TR020001</p> <p>APP7-5210</p> <p>TR020001/APP7-10</p>		<p>Project Name</p> <p>Luton Airport Expansion Development Consent Order</p>
<p>Drawing Number</p> <p>LAACO-30-AEC-00-00-DR-YE-QA1.1</p>		<p>Drawing Number</p> <p>LAACO-30-AEC-00-00-DR-YE-QA1.1</p>		<p>Project Name</p> <p>Luton Airport Expansion Development Consent Order</p>

FIGURE A1.2 - INDICATIVE NOISE INSULATION SCHEME EXTENTS, PHASE 2A (2039)

This drawing is for consultation purposes only and is not to be used for any other purpose. It is the responsibility of the user to ensure that the information is accurate and up to date. The information is provided as a guide only and is not to be used for any other purpose. The information is provided as a guide only and is not to be used for any other purpose.

Legend

Local Authority Boundaries

Proposed Daytime Noise Insulation Scheme Eligibility Noise Contours (2039)

Scheme 5 - 54dB LAeq, 16h Daytime Contour

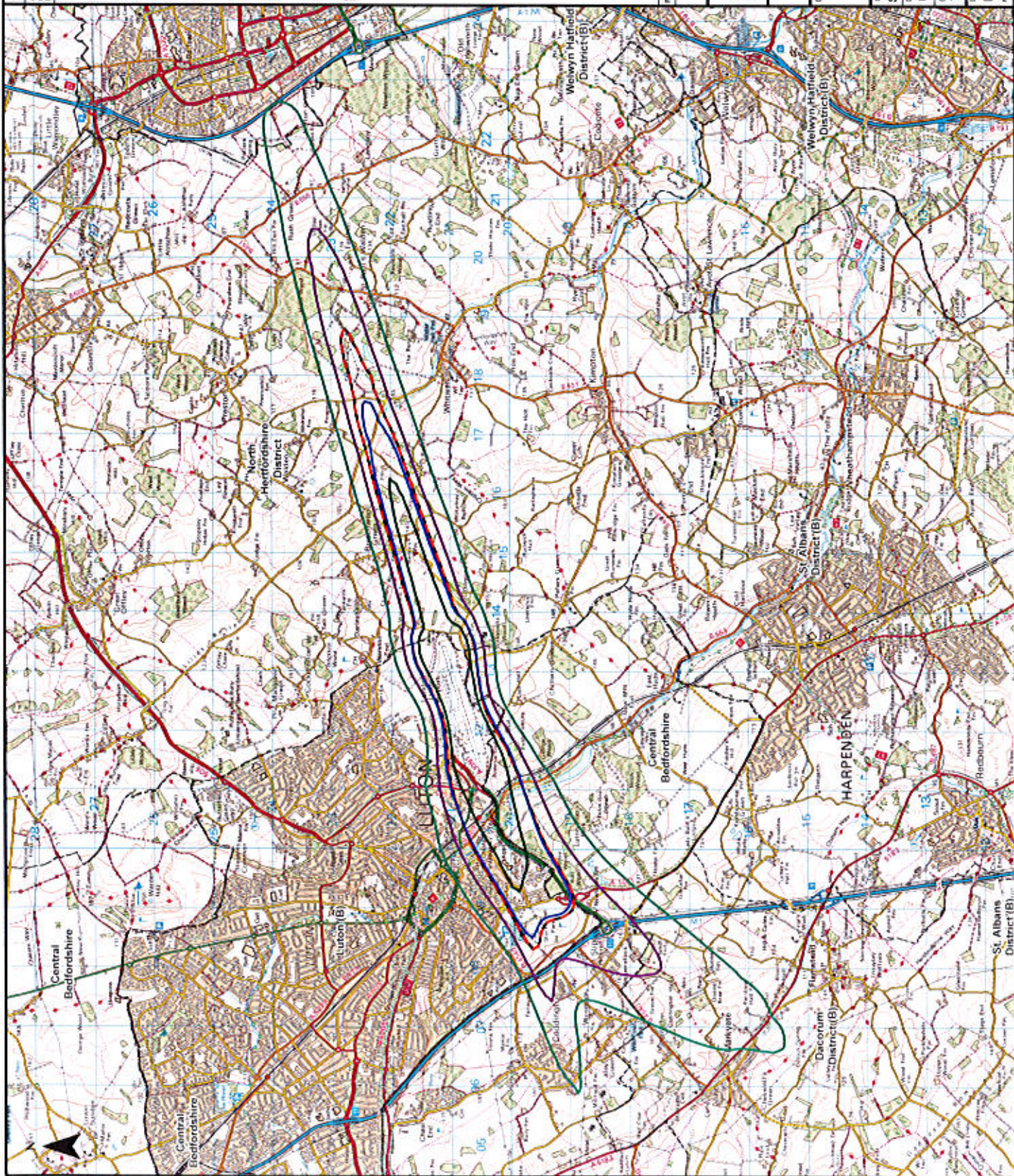
Scheme 4 - 57dB LAeq, 16h Daytime Contour

Scheme 2 - 60dB LAeq, 16h Daytime Contour

Scheme 1 - 63dB LAeq, 16h Daytime Contour

Proposed Night-time Noise Insulation Scheme Eligibility Noise Contours (2039)

Scheme 3 - 55dB LAeq, 8h Night-Time Contour



First Issue	LP	CS	CS	2006/23	P01
Revision History	Drawn	Checked	Approved	Date	New

Luton Rising
Luton Rising
Hart House Business Centre
Kings Road, Luton, LU1 3JH
www.lutonrising.org.uk

London Luton Airport Expansion Development Consent Order

Figure A1.2
Indicative noise insulation scheme extents
Phase 2a (2039)

SUITABLE FOR INFORMATION					Scale
Drawn	Checked	Approved	Date	Scale	Scale
LP	CS	CS	2006/23	1:60,000	A3

TR020001
TR020001/APP/17.10

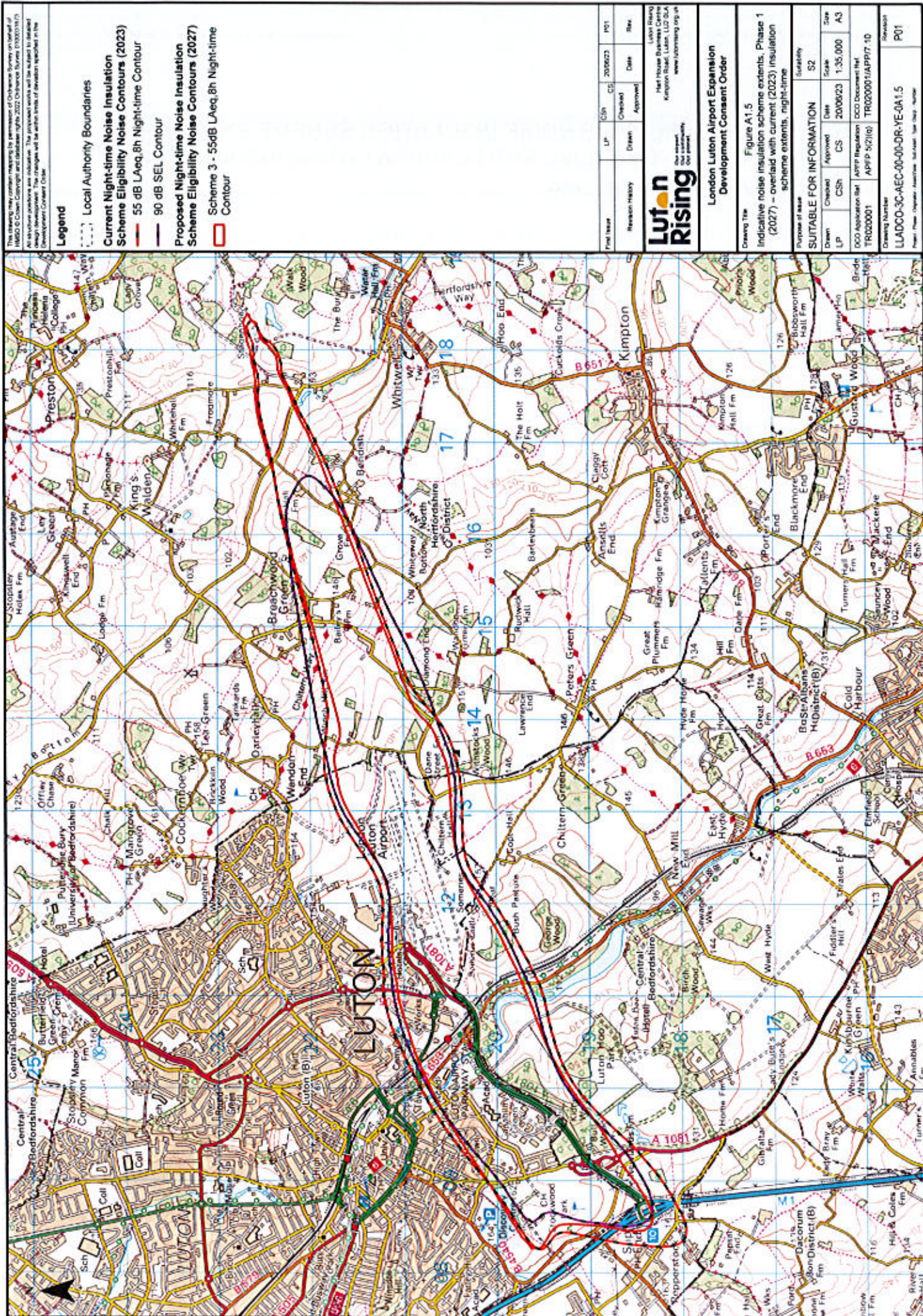
LA000-3C-AEC-00-00-DR-YE-0A1.2

P01

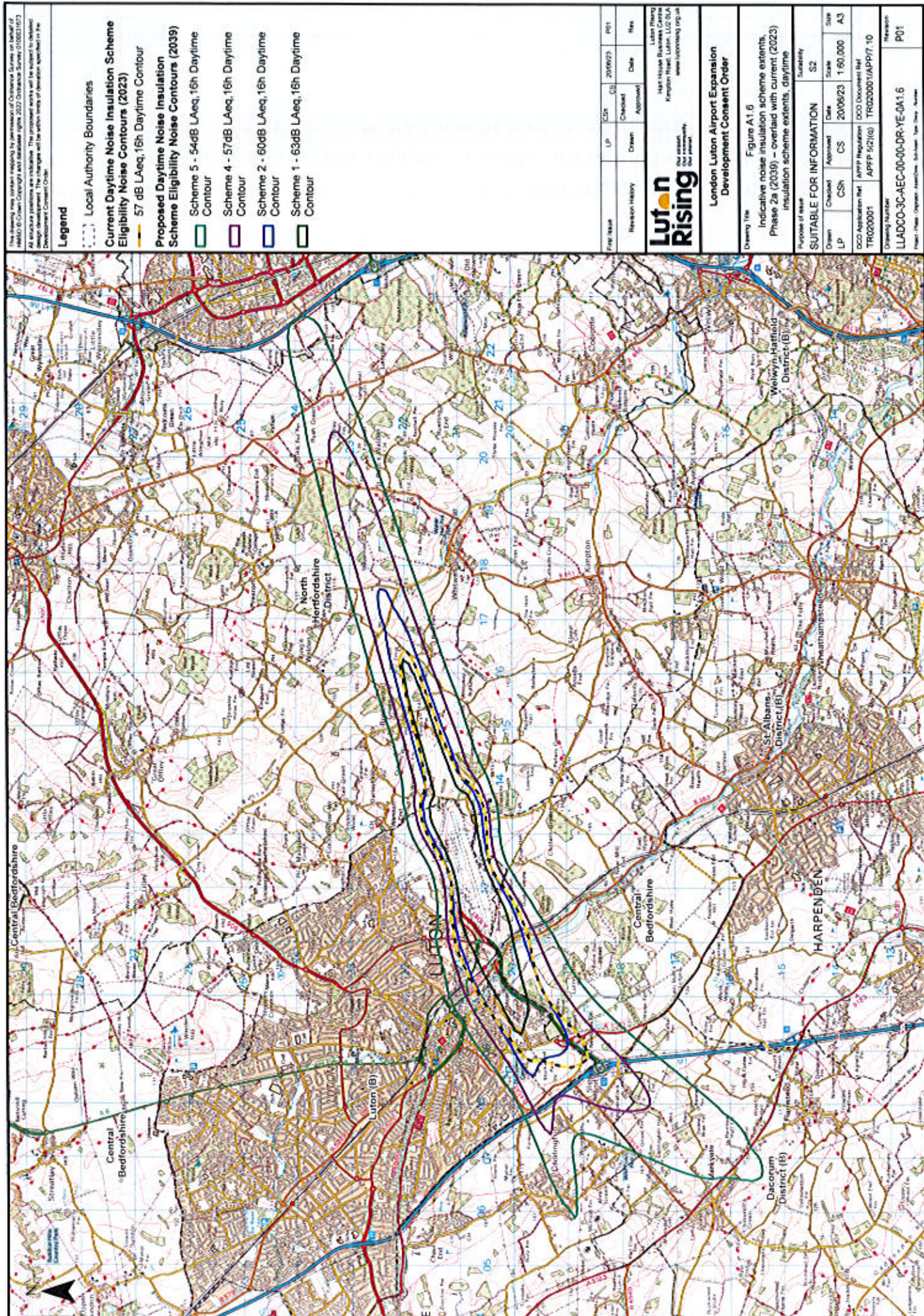
FIGURE A1.3 - INDICATIVE NOISE INSULATION SCHEME EXTENTS, PHASE 2B (2043)

**FIGURE A1.4 - INDICATIVE NOISE INSULATION SCHEME EXTENTS,
PHASE 1 (2027) – OVERLAID WITH CURRENT (2023) INSULATION
SCHEME EXTENTS, DAYTIME**

**FIGURE A1.5 - INDICATIVE NOISE INSULATION SCHEME EXTENTS,
PHASE 1 (2027) – OVERLAID WITH CURRENT (2023) INSULATION
SCHEME EXTENTS, NIGHT-TIME**

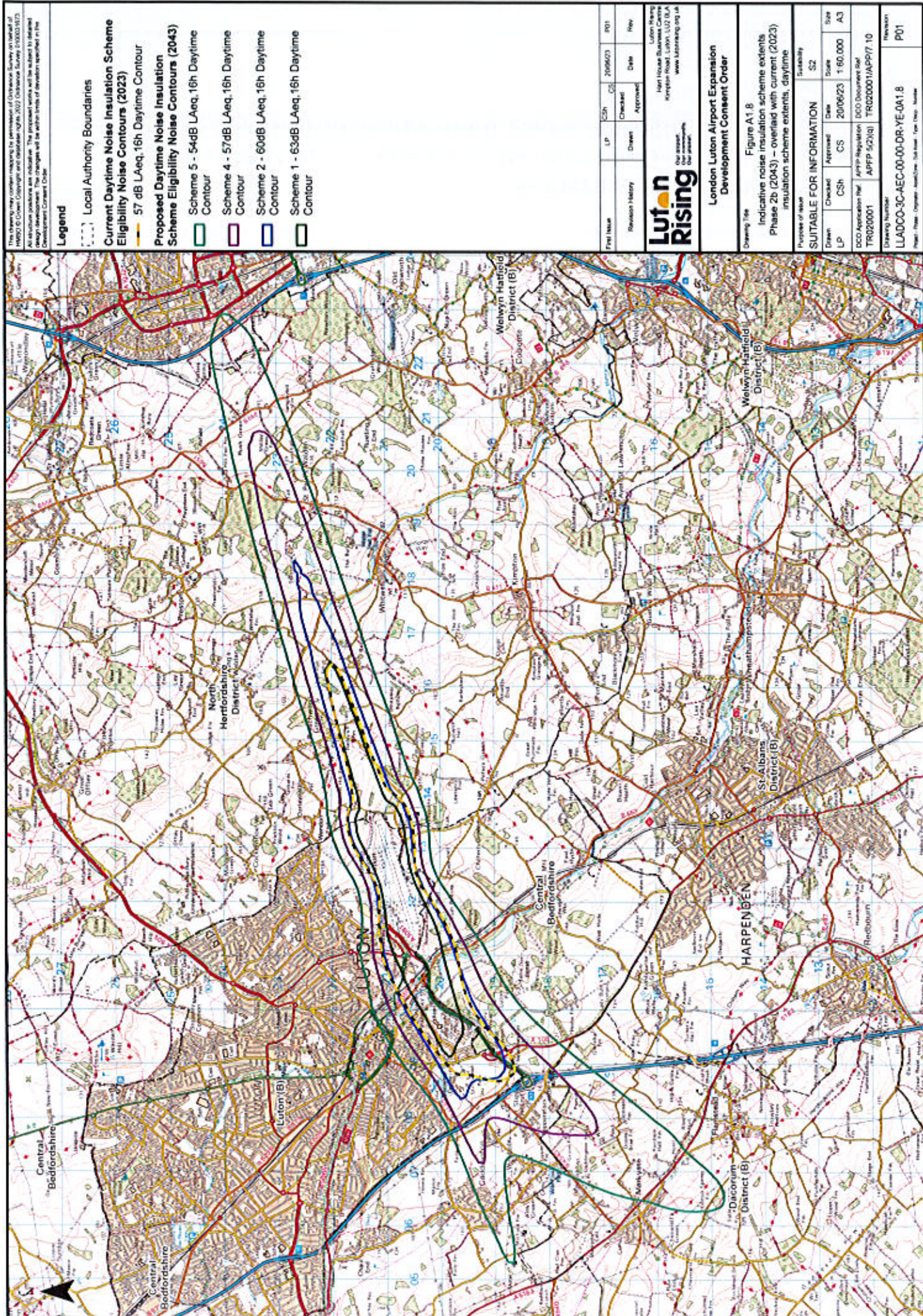


**FIGURE A1.6 - INDICATIVE NOISE INSULATION SCHEME EXTENTS,
PHASE 2A (2039) – OVERLAID WITH CURRENT (2023) INSULATION
SCHEME EXTENTS, DAYTIME**

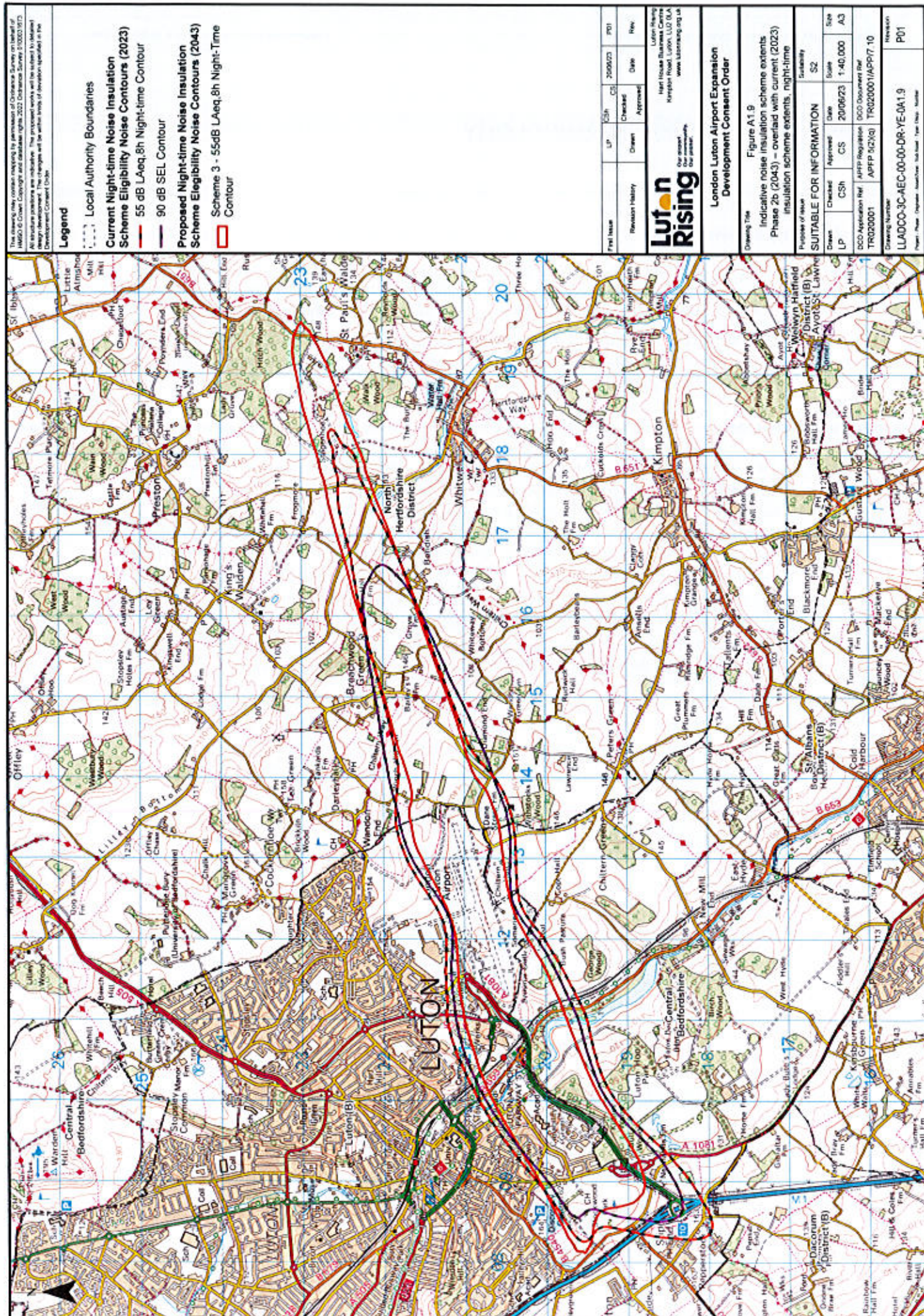


**FIGURE A1.7 - INDICATIVE NOISE INSULATION SCHEME EXTENTS,
PHASE 2A (2039) – OVERLAID WITH CURRENT (2023) INSULATION
SCHEME EXTENTS, NIGHT-TIME**

**FIGURE A1.8 - INDICATIVE NOISE INSULATION SCHEME EXTENTS,
PHASE 2B (2043) – OVERLAID WITH CURRENT (2023) INSULATION
SCHEME EXTENTS, DAYTIME**



**FIGURE A1.9 - INDICATIVE NOISE INSULATION SCHEME EXTENTS,
PHASE 2B (2043) – OVERLAID WITH CURRENT (2023) INSULATION
SCHEME EXTENTS, NIGHT-TIME**



APPENDIX B – NOISE TERMINOLOGY

B1

Noise assessment

- B1.1.1 An assessment of noise has been undertaken as part of the Environmental Impact Assessment (EIA) for the Proposed Development. Full details of this assessment are provided in **Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]**. The noise assessment has been used to develop the noise insulation policies in this document to ensure that significant effects on health and quality of life from noise are avoided.

Noise metrics

- B1.1.2 The primary noise metric used in the noise assessment, and to define eligibility for the Noise Insulation Schemes, is the $L_{Aeq,T}$ metric, where 'T' represents the relevant time period for the daytime (16 hours or '16h') and night-time (8 hours or '8h'). The $L_{Aeq,T}$ noise measurement is the most common international measure of aircraft noise. It represents the 'equivalent continuous noise level'. $L_{Aeq,T}$ noise levels over a geographical area, as represented by noise contours, are affected by both the number of aircraft movements, and the noise level from individual aircraft movements. Research by the Civil Aviation Authority (Ref. B.1) has shown that $L_{Aeq,T}$ noise contours are the best correlated indicators with health impacts and community annoyance due to aircraft noise.
- B1.1.3 Key thresholds for the assessment of noise impacts, in line with Government noise policy, are the Lowest Observed Adverse Effects Level (LOAEL), the Significant Observed Adverse Effects Level (SOAEL) and the Unacceptable Adverse Effects Level (UAEL). Further information on these thresholds including how they have been defined and used in the noise assessment is presented in Section 16.5 of **Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]**.

Noise contour maps

- B1.1.4 Noise contour maps are maps which represent how noise exposure varies across an area. In the same way that contour lines on orienteering maps may be used to show areas of equal height, noise contour maps show equal areas of noise exposure for a given noise metric. These maps can therefore be used to determine eligibility for different Noise Insulation Schemes which have different noise exposure eligibility requirements.
- B1.1.5 Noise contour maps have been created to accompany the noise assessment presented in **Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]**. For example, **Figure 16.15** and **Figure 16.16** of the ES **[TR020001/APP/5.03]** show the predicted daytime and night-time noise exposure for the year 2027 with the Proposed Development and can be used to give an indication of the potential extent of the Noise Insulation Schemes in that year. Indicative noise contours (for illustration purposes only) are also provided

in Appendix A. However, it should be noted that eligibility for the schemes will be confirmed as described in section 6 of this document.

APPENDIX C – DRAFT TERMS OF REFERENCE FOR NOISE INSULATION SUB-COMMITTEE

C1

C1.1.1 The draft Terms of Reference for the Noise Insulation Sub-Committee will be finalised and agreed with LLACC, and are as follows:

- a. To be responsible for prioritising the eligible properties (both residential and non-residential) in accordance with the roll out plan as per para 6.1.21 under **Compensation Policies, Measures and Community First [TR020001/APP/7.10]** as approved by the DCO.
- b. To receive the draft roll out plan prepared by the Applicant before it is submitted to Luton Borough Council for approval and offer any suggestions for the Applicant to consider which the Applicant will have due consideration of in finalising the roll out plan. These suggestions to be provided within 14 days of receiving the draft roll out plan so that it can be taken through the approval process with the local authority ready to implement at the point notice is served in accordance with article 44(1).
- c. To have authority to make decisions about the prioritisation of eligible properties to be offered noise insulation under the policy, such prioritisation to be based upon those most affected by noise with the committee having discretion to accelerate special cases. To receive quarterly reports on the number of properties being offered and taking up the noise insulation offered under the policy.
- d. To monitor and provide guidance to the Applicant regarding feedback from homeowners who have issues with the scope and specification of noise insulation being offered under the policy.
- e. To receive and resolve within three months any appeals made by homeowners dissatisfied with the full package of insulation offered under Schemes 1 and 3 in the policy.
- f. To engage with the Applicant to maximise take up of noise insulation being offered under the policy and comment on ways that might help accelerate the roll out and assist those most affected by noise.
- g. To consider and comment on the administration, operation and development of the policy.
- h. To engage in the periodic review of the policy to ensure levels of contribution are maintained over time.
- i. To be consulted on the development of a rolling testing policy to be introduced and maintained by the Applicant and to engage in a periodic review of the testing policy based on the evidence collected.
- j. To be maintained as a Committee throughout the programme of delivery of the Proposed Development.

- C1.1.2** The Committee may include representatives for the Applicant, the airport operator, Luton Borough Council, the host local authorities and any other LLACC member organisations. The members of the Committee will have equal standing save that the Chair shall be independent and shall be appointed by the airport operator subject to consultation with the Noise Insulation Sub-Committee. The Chair will have the casting vote for decision-making purposes.
- C1.1.3** The Committee will be made up of no more than 10 members and will be deemed quorate when at least 5 of the members are in attendance.

REFERENCES

Ref. 1.1 Planning Portal. 2023. Compulsory Purchase and Compensation Booklets.

Ref. 2.1 UK Government. 2023. Compulsory purchase system guidance.
<https://www.gov.uk/government/publications/the-land-compensation-manual>

Ref. 6.1 Transport Research Laboratory Ltd (2002), Converting the UK traffic noise index LA10,18h to EU noise indices for noise mapping

Ref. 6.2 Independent Commission on Civil Aviation Noise (2021) ICCAN review of airport noise insulation schemes

Ref. B.1 Civil Aviation Authority (2021), CAP1506: Survey of Noise Attitudes 2014: Aircraft Noise and

Annoyance, Second Edition and Civil Aviation Authority (2021), CAP2161: Survey of Noise Attitudes 2014: Aircraft Noise and Sleep Disturbance