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Ref – 41431

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Dear David,

19 MPPA APPLICATION – LPA REFERENCE: 21/00031/VARCON REQUEST FOR FURTHER INFORMATION UNDER REGULATION 25 OF THE EIA REGULATIONS 2017

Introduction

I write in response to your emails dated 29 April 2021 and 20 May 2021 in which Luton Borough Council requested further information under regulation 25 of the EIA Regulations to assist in determining the above application. A response to each request for further information is set out below.

Environmental Statement (ES) Climate Chapter and Planning Statement

Wood have reviewed and considered the comments provided by Ricardo (Luton Borough Council's environmental consultants) dated 23 April 2021 which contained comments on the ES Climate Chapter and the Planning Statement.

Wood have been provided with legal advice which elicits the following points for your information:

1. The airport is committed to reach carbon neutrality by 2026 and net zero by 2040 for Scope 1 and 2 emissions. This commitment can be found within the Carbon Reduction Plan and will be the basis of a Carbon Reduction Strategy when developed by the end of 2022. This Strategy will provide detailed and viable targets for absolute reductions in carbon emissions and achieving net zero related to the operations of the Airport, and that carbon effects from the Airlines and their ATMs will be considered at a national level and not a local level.
2. The airport will act as an enabler to help reduce Scope 3 carbon emissions. Scope 3 emissions include those from aircraft movements and are directly controlled by the airlines.
3. The airlines will need to operate within whatever framework the Government eventually reach on carbon emissions for aviation. In the meantime, it is important that planning authorities and their advisers apply relevant development control and land use policies, and do not confuse these with higher level government objectives or indications of future changes. It is for the government to decide how climate change commitments are to feed into and inform aviation planning policy.
4. We consider that carbon emissions beyond those which the airport can control is a national issue. The ES has contextualised all emission sources in the context of national policy including the aviation planning headroom, national carbon budgets and local policy, while the Carbon Reduction Plan presents steps London Luton Airport Operations Ltd (LLAOL) will take to achieve carbon neutrality by 2026 and net zero by 2040. This position is supported by paragraph 1.26 of Making Best Use of Existing Runways which states that "*as part of any planning*



application airports will need to demonstrate how they will mitigate against local environmental issues, taking account of relevant national policies”.

The content of the submitted ES Climate Change Chapter and Planning Statement therefore remain as submitted. The Climate Change Chapter and Planning Statement are robust, sound and in line with planning policy relevant to determining planning applications at a local level.

Carbon Reduction Plan

Please find attached the Carbon Reduction Plan. The purpose of this document is to confirm the steps LLAOL has taken, and continues to take, to:

1. achieve carbon neutrality by 2026 and deliver net zero carbon for London Luton Airport's (LLA) direct operational emissions by 2040 (Scope 1 and 2 emissions);
2. work with partners to support carbon reduction in areas outside of LLAOL's direct control (Scope 3); and
3. the Carbon Reduction Plan also supports legislation being introduced by the UK Government for its 6th Carbon Budget to achieve a national 78% reduction target by 2035 for carbon emissions, compared to 1990 levels, through measures that would support a reduction in LLA's indirect carbon emissions related to surface access and aviation emissions.

The Carbon Reduction Plan is an 'outline' document, which as agreed, will be followed by a more detailed 'strategy' document following planning approval, which will be secured as a time-bound condition of the planning permission.

Environmental Statement (ES) Noise Chapter

Please find attached an updated ES Noise Chapter to address the comments made by Vernon Cole (the Council's noise advisor) titled 'Noise Review' and dated 25 February 2021.

As requested, Wood has provided a track changed version of the chapter to enable Luton Borough Council and all parties to understand and identify quickly where changes to the chapter have been made.

The updates made to the ES Noise Chapter do not change the validity of other assessments within the ES submitted for the 19 mppa application (41431RR20V3 Environmental Statement, dated 11th January 2021). The updated Noise Chapter should be read in conjunction with the updated Appendices included with the chapter (they continue to reference Volume 3 for consistency with the original ES Noise Chapter). The original Figures within the ES Volume 3: Figures and Appendices do not change.

Conclusion

I trust this letter provides Luton Borough Council with a clear understanding of LLAOL's position. With this new information Wood consider that taking into account the significant economic benefits associated with expansion of the airport to 19 mppa and considering the existing and enhanced mitigation, the application is compliant with the Development Plan, national planning policy and other material considerations. In-line with the presumption in favour of sustainable development advanced in the NPPF it is respectfully requested that the proposal to increase the annual passenger cap from 18 mppa to 19 mppa be granted planning permission.

Edward Purnell
Principal Consultant

PP. Alejo Perez Monsalvo - CAPEX Director, LLAOL

