

25 August 2021
Ref – 41431

Wood Group UK Limited
Redcliff Quay
120 Redcliff Street
Bristol BS1 6HU
United Kingdom
Tel +44 (0)117 317 8950
www.woodplc.com

David Gurtler
Planning Officer
Luton Borough Council
Development Control
Department of Environment and Regeneration
Town Hall
Luton
LU1 2BQ

Dear David,

19 MPPA APPLICATION – LPA REFERENCE: 21/00031/VARCON CLARIFICATIONS ON SUBMITTED INFORMATION

Introduction

Following the consultation on the application in January and February 2021, the Regulation 25 consultation in June 2021 and your emails in late July 2021, please find enclosed:

1. A table that provides clarifications in relation to issues raised during the January and February 2021 consultation and recent regulation 25 consultation.
2. A document responding to comments from Vernon Cole and yourself between 19th July and 16th August in respect of the updated ES Noise Chapter that was consulted on in June 2021.

Both documents have been prepared to assist the Council in drafting the committee report and determining the application.

I also set out in this letter clarifications related to other topics including Carbon, Making Best Use of Existing Runways policy, and the effect of the Covid pandemic.

The information contained within the enclosed documents and this letter is not new information. Instead it seeks to provide clarifications in respect of information that has already been submitted and signpost the Council to where the information has been considered within the application. It has not been issued in response to a formal regulation 25 request, nor does it contain substantive information relating to the environmental statement and therefore it does not constitute 'further information' or 'any other information' under the EIA Regulations and there is no need for further consultation under regulation 25 of the EIA Regulations.

Noise Clarifications

Following a detailed review of comments provided by Vernon Cole and yourself between 19th July and 30th July, we have produced the attached document to provide clarifications on the information already submitted in the updated ES Noise Chapter. It covers items including forecasting, validation and scenario years. We trust this will provide you with answers and clarifications to the questions you have raised about the submitted information.

The information provided within this document is not substantive information relating to the ES and does not change the validity of other assessments within the ES submitted for the 19 mppa application (41431RR20V3 Environmental Statement, dated 11th January 2021).



Clarifications table in relation to issues raised during consultation

We have analysed the responses generated through the consultation in January and February 2021 and the more recent Regulation 25 consultation in June 2021. The attached table summarises the key issues we have identified and provides clarifications and signposting in relation to where those issues have been considered within the application. It is hoped that the document will provide the Council with useful clarifications and responses to assist in the determination of the application.

Carbon

In April 2021 the UK Government announced the adoption of the total budget recommended by the Climate Change Committee (CCC) in the 6th Carbon Budget, with a new target of a 78% reduction in CO₂ by 2035 (15 years ahead of its original target) and the inclusion of international aviation and shipping in the budget for the first time. It is noted that not all recommendations made by the CCC have been accepted by the UK Government, including sector specific targets. This was followed in June 2021, when the Government issued legislation to align the carbon budget with the total budget recommendation made by the CCC.

These recommendations, and thereby by inference the new targets, were specifically taken into account when producing the submitted ES, including a reduced aviation sector target of 23MtCO₂/yr compared to the previous 'planning assumption' of 37.5 38MtCO₂/yr. This results in two key points:

1. The ES had already taken this change in policy into account. It followed emerging CCC advice which has now been ratified. As a result an update to the ES is not necessary.
2. The ES remains in line with government policy on carbon.

The ES, and the supporting outline Carbon Reduction Plan, is therefore still a sound and robust document on which to base a positive recommendation on the application.

Covid

There have been some comments about the effects of Covid on demand for flights. As set out on the clarifications document, the forecasts provided still represent a reasonable view of how passenger levels will rebound post-COVID and reflect the confidence of LLAOL and the airlines. The fact that noise levels in 2021 have been overpredicted due to the continuation of lock down it does not invalidate the overall assessment results. The worst-case year for significant effects (upon which the assessment results and mitigation are based) is conservatively still considered to be 2022, but this is dependent on demand and the continued effect of Covid-19 on international travel. Whether the Government continues to offer slot relief to airlines will also be a factor. Based on current fleet renewal information obtained from airline published accounts, 2031 is still considered the year in which the existing Condition 10 would again be met.

Condition Wording

For the avoidance of doubt, as set out on the updated ES Noise Chapter submitted to the Council in May 2021, as confirmed via email on 4th May 2021 with Vernon Cole and yourself, and then subsequently consulted upon as part of the regulation 25 consultation in June 2021, LLAOL are seeking the following changes to Condition 10. As these amendments have already been consulted upon as part of the regulation 25 consultation in June 2021 they are not new information.

The area enclosed by the 57dB(A) Leq16hr (0700-2300) contour shall not exceed ~~19.4 sq km~~ 21.6 sq km for daytime noise, and the area enclosed by the 48dB(A) Leq8hr (2300-0700) contour shall not exceed ~~37.2 sq km~~ 42.9 sq km for night-time noise, when calculated by the Federal Aviation Authority Integrated Noise Model version 7.0-d (or as may be updated and amended) for the period up to the end of 2027. Post 2027 the area enclosed by the 57dB(A) Leq16hr (0700-2300) contour shall not exceed 15.5 sq km for daytime noise, and the area enclosed by the 48dB(A) Leq8hr (2300-0700) contour shall



not exceed 35.5 sq km for night time noise. Post 2030 the area enclosed by the 57dB(A) Leq16hr (0700-2300) contour shall not exceed 15.1 sq km for daytime noise, and the area enclosed by the 48dB(A) Leq8hr (2300-0700) contour shall not exceed 31.6 sq km for night time noise.

Making Best Use of Existing Runways

The 19mppa application was submitted on 11th January 2021 and considered all current policy including the Airports National Policy Statement (ANPS) and Beyond the horizon: The future of UK aviation: Making best use (MBU) of existing runways (2018). Since then, the government has made a series of announcements related to aviation and carbon, most recently publishing the following documents for consultation:

1. Jet Zero Consultation (14th July 2021); and
2. The Transport Decarbonisation Plan (14th July 2021).

The Jet Zero Consultation commits the aviation sector to a net zero emissions target by 2050 and sets out the approach and principles to achieve this. It also makes clear that the ANPS and MBU remains material to decision making on applications for planning permission. Footnote No.39 to this document states that *"Beyond the horizon The future of UK aviation: Making best use of existing runways (2018) and Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (2018) are the most up-to-date policy on planning for airport development. They continue to have full effect, for example, as a material consideration in decision-taking on applications for planning permission. The government is clear that expansion of any airport must meet its climate change obligations to be able to proceed"*. In respect of the final point, LLAOL recognise the need to implement tangible measures for carbon reduction and has committed to develop a detailed Carbon Reduction Plan that builds on the outline plan, by the end of 2022. This will provide detailed and viable targets for an absolute reduction in carbon emissions and achieving net zero.

The Transport Decarbonisation Plan states that *"International connectivity is a vital part of Global Britain, and everyone should continue to have access to affordable flights, allowing them to go on holiday, visit family, and do business"*. It does also acknowledge that as aviation recovers from Covid *"it must do so in a lower-carbon way"*. It confirms the government has *"have committed to including international aviation, and shipping, in our Sixth Carbon Budget, and propose to set a high ambition CO2 emissions reduction trajectory for it from 2025 to 2050 against which we will measure progress"*.

The content of these government publications demonstrate that the government does not wish to stifle the growth of aviation. As a result the proposals are in line with government policy which reconfirms that the ANPS and MBU continue to have full effect. A decision on the application should therefore be made without further delay.

Conclusion

We trust the clarifications enclosed and set out in this letter provide the Council with helpful details on the application and assist them in determining the application. We consider that taking into account the substantial 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

