

Table 1 Air Quality

Issue	Response
Concern that the proposals will result in an increase in air pollution as a result of increased road traffic.	The effects of increased road traffic on air quality have been addressed in the Environmental Statement (document reference 41431RR20V1), Chapter 6: Air Quality . The modelling for the assessment included emissions from road traffic as well as aircraft and on-airport sources. The air quality effects are presented in Section 6.10 . This shows that the impact of the Proposed Amendments is negligible at all receptors for all pollutants. This includes at receptors next to roads, including alongside the M1 motorway and New Airport Way which carry most airport-related traffic. Further information on the traffic data used in the air quality modelling is given in Chapter 10: Transport of the Environmental Statement .
Concern that there has been a lack of consideration to an Air Quality Environmental Impact Assessment, which is needed to understand current and predicted impacts as a result of increased capacity	The effects of increased airport capacity on air quality have been addressed in the Environmental Statement (document reference 41431RR20V1), Chapter 6: Air Quality . The modelling for the assessment included emissions from aircraft, other on-airport sources and road traffic. The air quality effects are presented in Section 6.10 . This shows that the impact of the Proposed Amendments is negligible at all receptors for all pollutants. This includes at receptors close to the airport and at receptors next to roads, including alongside the M1 motorway and New Airport Way which carry most airport-related traffic.
An Air Quality Plan (AQP) should be subject to consultation and views upon it taken into consideration in determining the planning application. Or the provision of AQP should be secured by way of condition.	<p>Air quality in the area around London Luton Airport is currently well within the national Air Quality Objectives, and is improving over time. For example, monitored annual mean concentrations of NO₂ along Eaton Green Road over the last five years are in the twenties or low thirties, compared to an Air Quality Objective of 40 µg m⁻³. Monitoring of the other major pollutant of concern, PM_{2.5}, shows annual mean concentrations of 9 or 10 µg m⁻³, well below the Air Quality Objective of 25 µg m⁻³, and meeting the World Health Organization guideline of 10 µg m⁻³.</p> <p>As part of the planning application for the proposed increase in passengers to 19mppa, an assessment of Air Quality effects was undertaken. This is</p>

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The Hertfordshire County Council has a sustainability strategy which promises "clean air for all" by 2030. The Airports 19mmpa plan would clearly adversely affect this strategy.

presented in Volume 2, Section 6 of the Environmental Statement accompanying the planning application. This demonstrates that the impact of the proposed development will be negligible, resulting in only very small increases in concentrations of air pollutants and no risk of causing any exceedances of Air Quality Objectives. As such, a formal Air Quality Plan is not necessary specifically because of the Proposed Development. However, as part of its Responsible Business strategy, LLA has committed to developing a formal Air Quality Strategy, which would consider how best to manage and control air quality around Luton Airport, in combination with existing Management Plans (e.g. Carbon Management Plan).

Air quality in the area around London Luton Airport is currently well within the national Air Quality Objectives, and is improving over time. For example, monitored annual mean concentrations of NO₂ along Eaton Green Road over the last five years are in the twenties or low thirties, compared to an Air Quality Objective of 40 µg m⁻³. Monitoring of the other major pollutant of concern, PM_{2.5}, shows annual mean concentrations of 9 or 10 µg m⁻³, well below the Air Quality Objective of 25 µg m⁻³, and meeting the World Health Organization guideline of 10 µg m⁻³.

As part of the planning application for the proposed increase in passengers to 19mmpa, an assessment of Air Quality effects was undertaken. This is presented in Volume 2, Section 6 of the Environmental Statement accompanying the planning application. This demonstrates that the impact of the proposed development will be negligible, resulting in only very small increases in concentrations of air pollutants and no risk of causing any exceedances of Air Quality Objectives.

Table 2 Carbon

Issue	Response
<p>Suggestion that a researched and evidenced Carbon Reduction Plan must be delivered before the application can be determined as Luton Council has committed to becoming carbon neutral by 2040 as per their declared climate emergency</p>	<p>London Luton Airport Operations Ltd (LLAOL) committed to producing an Outline Carbon Reduction Plan (OCRP) in Section 7.15, Chapter 7 of the Environmental Statement (document reference 41431RR20V1). Following discussion with LLAL and Luton Council, this plan has been produced and was submitted to LBC ahead of the determination of the 19mppa planning application.</p> <p>The OCRP considers all emissions sources including direct emissions for airport operations and buildings, indirect emissions from electricity purchase, on-site stakeholders such as airside partners, hotels, retail etc., surface access emissions from passengers and staff travel, and aviation emissions. It sets out a framework for LLAOL achieving a net zero airport for Scope 1 and 2 emissions, including details of the ambitions and mitigation measures required to achieve this aim. These ambitions and mitigation measures will ensure that LLAOL achieves carbon neutrality by 2026 and net zero by 2040 across the direct operations within its control, the later target representing a 100% reduction in its Scope 1 and 2 emissions. The OCRP also identifies measures that LLAOL can implement to influence Scope 3 emissions, linked to London Luton Airport and recognises LBC's aim for the borough to be carbon neutral by 2040.</p> <p>The full Carbon Reduction Plan would be provided following the grant of planning approval, as a time-bound condition of the planning permission, as stated in Chapter 7 of the Environmental Statement (document reference 41431RR20V1). This commitment to produce the Carbon Reduction Plan forms part of LLAOL's wider commitment to reaching more ambitious levels of certification within the Airport Carbon Accreditation Scheme, which would ultimately result in carbon neutral operations associated to Scope 1 and Scope 2 emissions by 2026. The development of the full Carbon Reduction Plan will also include engagement with key stakeholders including local authorities, transport providers, aviation sector organisations and airlines.</p>

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Concern that the proposal to increase passenger numbers is not in keeping with local and national priorities of becoming carbon neutral by 2050 as carbon emissions will increase

Concern about the impact of the proposals on the climate emergency

Concern that the proposals compromise net zero carbon goals

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The GHG assessment presented in the Climate **Chapter 7 of the Environmental Statement (document reference 41431RR20V1)** submitted as part of the 19mppa application, assesses the impact of the increase in GHG emissions as a result of the Proposed Scheme on the global climate taking into consideration the urgency of the issue around climate change and the associated national and local targets. LLAOL recognise that climate change is one of the most pressing challenges we face as a society and a defining issue of our times. LLAOL has committed to addressing this challenge in the Responsible Business Strategy¹ and the mitigations proposed as part of the **Environmental Statement (document reference 41431RR20V1)** in Section 7.15, including the production of an outline Carbon Reduction Plan (CRP).

Current IEMA principles and guidance² state that due to the “combined environmental effect, that is approaching a scientifically defined limit, any GHG emissions or reductions from a project might be considered to be significant”, however there is no further guidance on the determination of significance. Therefore, to contextualise the GHG emissions from the Proposed Scheme the extent to which the magnitude of GHG emissions affects the ability to meet national budgets and local targets for climate change is assessed in **Section 7.11 of Chapter 7 of the Environmental Statement (document reference 41431RR20V1)**

The principle adopted for mitigation measures is to focus on achieving a reduction in energy consumption and emissions before considering mechanisms for addressing residual emissions. However, LLAOL have produced an outline Carbon Reduction Plan (CRP) which presents the steps LLAOL has taken, and continues to take, to achieve carbon neutrality by 2026 and deliver net zero carbon for LLA direct operational emissions by 2040. The outline CRP also includes actions and mitigation measures which LLAOL can take forward to influence Scope 3 emissions (including GHG emissions from surface access and those relating to Scope 3 activities on-site). In addition, a coordinated approach is being taken and will continue to

¹ Responsible Business Strategy <https://www.london-luton.co.uk/LondonLuton/files/eb/eb79ca97-d37c-4803-9f89-c4965a466814.pdf>

² Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance IEMA <https://www.iema.net/preview-document/assessing-greenhouse-gas-emissions-and-evaluating-their-significance>

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be taken with local authorities and partners on-site to reduce these GHG emissions in-line with the national target.

In recognition of the urgency for action, the mitigations within the OCRP have been divided into short term (2020-2025), medium term (2026-2031) and long-term actions (2032-2050). LLAOL are committed to taking action during the length of their concession with short-term (2021-2025) measures highlighted in line with the Responsible Business Strategy and a series of additional measures targeted at achieving carbon neutrality for LLA by 2026. The Full Carbon Reduction Strategy will be delivered with the support of key stakeholders to ensure long-term mitigation measures have appropriate governance structures.

Within the ES, GHG emissions from the Proposed Scheme are contextualised against the UK carbon budgets and are found to contribute very small percentages (0.018 – 0.019% of the fourth carbon budget and 0.014 - 0.019% of the fifth carbon budget period). The Sixth Carbon Budget was legislated in June 2021, with the total budget in line with the recommendation made by the CCC as included in the ES. For further details on this contextualisation please see **Section 7.11 of the Environmental Statement (document reference 41431RR20V1), and supporting data in Appendix 7A.**

It is concluded in **Chapter 7 of the Environmental Statement (document reference 41431RR20V1)** that on the basis of the commitment to produce a Carbon Reduction Plan, the scale of GHG emissions from the Proposed Scheme are such that they will have a negligible effect on the ability of the UK to meet its carbon targets. Additionally, the scale of GHG emissions from the Proposed Scheme are such that they are unlikely to affect the ability of Luton Council to meet its carbon neutral aim. To date, this is an aspiration rather than a policy and the scope of this has not yet been defined.

Suggestion that if the application is approved strict conditions , including the research and use of plant based fuels, be imposed to reduce emissions

The use of sustainable aviation fuel (SAF) has been recognised by the UK Government, the CCC (Climate Change Committee) and the aviation industry as an essential development in aviation technology to drive GHG

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emission reductions. In Chapter 7 of the ES, it is assumed that this development will occur in the sector although it will take time for extensive uptake. Therefore, SAF usage has been included as a future improvement in both the 'without development' and 'with development' cases in the 2050 scenario. There is uncertainty surrounding both the rate of uptake and the potential emission saving that SAFs could introduce, and this uncertainty is recognised in the **Environmental Statement (document reference 41431RR20V1)** through the use of three future scenarios, see **Appendix 7A**. A conservative approach has been taken in the ES assuming relatively slow uptake and emission savings.

Latest guidance from the CCC (contained in the Sixth Carbon Budget Recommendation Report)³ suggests that higher levels of SAF uptake across the UK are attainable. These have been incorporated into the scenario used for the sensitivity assessment, included in the **Environmental Statement (document reference 41431RR20V1) in Section 7.11**, based on the Balanced Pathway CCC scenario. The UK Government has committed to consulting on a UK SAF blending mandate to kick-start the market which could enable greater SAF uptake than is within the CCC's Balanced Pathway. This would support the UK Government's vision to scale up the use of SAF over the coming years, such that by 2050 they are primarily used on flights that are challenging to conduct by zero emission aircraft.

Confidence is given to this approach by the recent support and investment by the UK Government in SAF development through the Jet Zero Council. The Jet Zero Council SAF Delivery Group has been set up for government and industry to work together to establish UK SAF production facilities and accelerate the delivery of the fuel to the market. It is currently focusing on four specific areas: development of a SAF mandate; commercialisation of SAF; technologies and feedstocks required for SAF production; and supply of SAF at UK airports for COP26.

Supplementary to this, LLAOL is also identifying measures it can implement

³ CCC Sixth Carbon Budget: Aviation Chapter <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Aviation.pdf>

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to influence Scope 3 emissions, linked to London Luton Airport. These measures are presented within the outline Carbon Reduction Plan and LLAOL will engage with key stakeholders within the aviation sector in the development of the full Carbon Reduction Strategy to explore new technologies to support this goal.

In particular the commitments within the outline CRP includes working with airlines, LLAL and the innovation working group to facilitate the uptake of low-carbon flights. LLAOL recognise that this will include infrastructure requirements for energy and fuel supplies, focusing on SAF. Also within the SAF is a commitment to review the Carbon Reduction Strategy due to any material changes in local or national policies which would include any mandating of SAF proposed by the UK Government.

London Luton Airport is aligned to the goals of Sustainable Aviation (SA) and actively involved in achieving the CO2 road-map and the sustainable aviation fuel road-map, for example encouraging airlines to use SAF at the airport where possible. Signature Flight Support have developed a continuous supply of SAF at LLA since December 2020 which offers more than a 25% reduction in direct net lifecycle GHG emissions from this blended fuel.

Concern that greenhouse gas emissions will increase even with the proposed new fleet and will be worse if the delivery of the new fleet is delayed

Modelling of the aviation GHG emissions presented in **Chapter 7 of the Environmental Statement (document reference 41431RR20V1)** is based on the fleet forecasts provided by LLAOL. These forecasts include assumptions regarding uptake of next generation fleet mixes which are incorporated into both the 'without development' and 'with development' scenarios.

As shown in **Section 7.10 of the Environmental Statement (document reference 41431RR20V1)**, 2019 baseline emissions from aviation were equal to 1.08 MtCO2 based on actual data. Relative to the 2019 baseline, aviation GHG emissions in the 'without development' and 'with development' scenarios decrease for all years assessed. This is because in both the 'with development' and 'without development' scenarios, the fleet composition includes the latest generation of aircraft which are more fuel

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efficient. Additionally, there will be a slight decrease of GHG emissions due to assumed efficiencies in air traffic management and operations which have been incorporated into the scenarios analysis.

In 2050, total aviation GHG emissions in the 'with development' scenario are 0.72 – 0.85 MtCO₂/yr, a decrease of 0.23 – 0.36 MtCO₂/yr (equivalent to a 21 – 33% decrease in total aviation GHG emissions), relative to the 2019 baseline conditions.

Concern that the proposals are not in keeping with the Climate Change Committee's recommendation that aviation targets should be halved

Concern that the Climate Change Committee stated that airport expansion must be reduced by at least 50% in order to meet the commitment to net zero carbon emission growth by 2050

The Consultees have misunderstood the CCC 2019 recommendations within the letter "Net Zero and the approach to international aviation and shipping emissions". The CCC 2019⁴ letter to the UK Government presents advice on achieving net-zero emissions based on international aviation emissions being reduced from 36.5 MtCO₂ in 2017 to around 30 MtCO₂ in 2050. This will be achieved through a combination of fuel efficiency improvements, limited use of sustainable biofuels, and by managing demand growth. Therefore, it is suggested a 20% reduction in the international aviation CO₂ target relative to 2017 levels. The CCC scenario presented for achieving this reduction includes a limit on demand growth across the UK aviation sector to at most 25% above current levels.

This recommendation has been superseded by more recent advice provided by the CCC in December 2020. In the Recommendations on the Sixth Carbon Budget report³, the CCC 'Balanced Pathway' scenario has an aviation sector target of 23 MtCO₂/yr by 2050. It is recognised that additional aviation policy interventions would be needed to achieve this target at a national level. These recommendations have been incorporated into the GHG assessment in the **Environmental Statement (document reference 41431RR20V1) (Section 7.11 of the ES)** which shows that LLA's share of emissions contributing to the 23 MtCO₂e/yr suggestion is 2.71%, which is equal to its 2019 share of actual emissions. It is therefore determined that given national and aviation sector ambition and associated implementation of aviation policy, the share of aviation emissions from LLA

⁴ CCC 2019 letter <https://www.theccc.org.uk/wp-content/uploads/2019/09/Letter-from-Lord-Deben-to-Grant-Shapps-IAS.pdf>

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<p>Concern that due to the release of high-altitude NOx and formation of contrail clouds could double the warming impact of aviation, as newer engines are only about 15% more fuel efficient.</p>	<p>is unlikely to increase compared to the baseline even if the CCC suggestion was brought into policy.</p> <p>As described in Section 7.9 of the Environmental Statement (document reference 41431RR20V1), it is acknowledged that non-CO2 effects may have a climate impact, although they have not been considered in the climate assessment of the ES. This is on the basis that the impacts could not be adequately quantified due to the level of scientific uncertainty, and they cannot be contextualised given that there is no international framework for considering them and current policy and emission targets do not include them.</p> <p>This approach is consistent with that taken by the Jet Zero Council⁵ who define zero emission aircraft as those that do not emit any tailpipe carbon emissions. Wider sustainability issues, including non-CO2 effects, will be considered by the Council but are not the primary focus of the UK Government's approach to achieving Net Zero.</p> <p>Efficiency of newer aircraft engines has been accounted for in the ES modelling through the use of dedicated fleet forecasts developed by LLAOL which extend to 2032. Beyond this, an improvement factor for aircraft and engine efficiency has been included based on projections from the CCC and Sustainable Aviation (see Appendix 7A of the Environmental Statement (document reference 41431RR20V1)).</p>
<p>Suggestion that the Carbon Reduction Plan, as reviewed by Ricardo, is inadequate as it does not provide sufficient detail or viable measures that are firm commitments within LLAOL's control. Concern around the Airport's focus on offsetting rather than emission reductions.</p>	<p>The outline Carbon Reduction Plan confirms the steps LLAOL has taken and continues to take, to achieve carbon neutrality by 2026 and deliver net zero carbon for direct operational emissions by 2040. The measures committed to by LLAOL include achieving further levels of accreditation with the Airport Carbon Accreditation (ACA) scheme. This is an independently, institutionally-endorsed, global standard for carbon management at airports and will demonstrate absolute emission reductions at LLA. In line with progression through the ACA scheme, offsetting is identified as an interim</p>

⁵ Jet Zero Council https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/921493/jet-zero-council-terms-of-reference.pdf

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	<p>action within the outline Carbon Reduction Plan to support achieving carbon neutrality in the short to medium term, however, as per the ACA definition of net zero, as stated in the outline Carbon Reduction Plan, the ultimate aim for net zero does not allow for offsetting. Therefore, actions in the outline Carbon Reduction Plan are focussed on achieving an absolute reduction in carbon emissions but in accordance with the ACA scheme, recognises that to achieve net zero the use of approved carbon removal measures (as distinct to offsetting) may be required to address potential residual emissions.</p>
<p>Suggestion that the Committee on Climate Change recommendations and advice, especially regarding net expansion, should be addressed.</p>	<p>The Climate Change Committee (CCC) is an independent, statutory body established under the Climate Change Act 2008. Its purpose is to advise the UK Government on emission targets and progress to date. While the Government must obtain and take into account the CCC's advice when setting emission targets and carbon budgets into policy, it does not have an obligation to accept the advice and may choose to implement these recommendations in part, in entirety or not at all.</p> <p>Recommendations and progress reports from the CCC have been considered in the ES as guidance documents and during the preparation of the outline Carbon Reduction Plan. Where these recommendations have been implemented through legislated (or draft legislation) UK policy, the relevant policies have been included in the assessment criteria of the ES. For example, the recommendations for the Sixth Carbon Budget which were made by the CCC in December 2020, this was noted in the original ES and used in the sensitivity assessment. The UK Government accepted the carbon budget target, although not each of the CCC's specific policy recommendations, in April 2021 and legislated the budget in July 2021. Consideration of the implications of the Sixth Carbon Budget, as legislated, are provided in the below response.</p>
<p>Concern that the additional information supplied by the Airport is unreliable and uses incorrect or out of date assumptions</p>	<p>The ES and the outline Carbon Reduction Plan utilise the most up-to-date data assumptions available at the time of production. Data sources used include the latest UK Government documents, industry targets (e.g. Sustainable Aviation) and recommendations from the Climate Change Committee (CCC). Recent publications by the UK Government, including</p>

Issue	Response
<p>Concern that the assessment is out of date since it does not consider the implications of the Sixth Carbon Budget and inclusion of international aviation and shipping within the budget. Concern regarding the planning assumption for aviation and its compatibility with net zero target.</p>	<p>the Decarbonising Transport Plan (released 14 July 2021) and the Jet Zero Consultation (released 14 July 2021) include more ambitious targets. We are therefore confident that new data sources would only reduce the reported emissions in the ES and/or support the achievement of targets within the outline Carbon Reduction Plan.</p> <p>It is acknowledged that since the production of the ES the UK Government has taken more definitive and ambitious action on climate change with the acceptance of the CCC's recommended Sixth Carbon Budget target and the inclusion of international aviation and shipping (IAS) emissions. The Government has also recently published the Transport Decarbonisation Plan and Jet Zero Consultation, both in July 2021. The ES assessment was based on government position on the 'planning assumption' for aviation emissions. Additionally, recommendations from the CCC on the Sixth Carbon Budget (December 2020) were used as a sensitivity analysis. The UK Government has not legislated any aviation sector specific carbon targets to date.</p> <p>The UK Government's recent publications around aviation have focused on delivering technology improvements within the sector to enable emission reductions in line with a net zero target. The Jet Zero Consultation provides details of the strategy for net zero aviation. It recognises that there are different pathways to achieve the commitment of net zero by 2050 and aims to retain flexibility over the pathway used. LLA's planning application is aligned to the UK Government strategy and industry best practice. The outline Carbon Reduction Plan demonstrates how LLAOL will achieve carbon net zero by 2040 for emissions they control (Scope 1 and 2), and will work with third parties to guide and influence emission reductions in line with UK Government policy by 2050.</p>

Table 3 Consultation

Issue	Response
Concern that Slip End Parish Council was not mentioned in the Wider Council Stakeholder list in the London Luton Airport 19mppa Consultation Summary Report.	The stakeholder list that was provided within the London Luton Airport 19mppa Consultation Summary Report is a record of all stakeholders that were identified and contacted directly as part of the consultation. This was in line with the consultation strategy that was discussed with Luton Council and does not reflect the stakeholders which responded to the consultation.
Concern that the airport has ignored feedback provided to the previous consultation, as summarised in the London Luton Airport -19 mppa Consultation Summary Report, by proceeding with the planning proposal.	The applicant can confirm that all feedback which was received as part of the non-statutory consultation for the 19mppa Project was taken into account within the development of the Environmental Statement which was submitted as part of the suite of documents which accompanied the Planning Application. The consultation was not a referendum on whether the application should be submitted,
Suggestion that the airport should address the objections raised in the London Luton Airport 19 -mppa Consultation Summary Report first.	Responses to the material issues raised as part of the consultation responses are provided within the relevant chapters of the Environmental Statement and within the Planning Application that was submitted.
Concern that the airport has ignored the fact that 92% of respondents summarised in the London Luton airport 19mppa Consultation Summary Report believed there would be no economic growth resulting from expansion.	LLAOL recognises that a number of respondents did not consider that there would be economic benefits from the Application, however, LLAOL considers that, as stated at paragraph 2.1.4 of the Planning Statement (document reference 41431EP12V3) the greatest impacts are felt within the immediate vicinity of the airport with a contribution of £957 million in Bedfordshire in 2019. In terms of jobs, paragraph 2.1.6 of the Planning Statement highlights that the airport is estimated to have sustained a total of 28,200 jobs across the UK in 2019. This comprised 10,900 “direct” jobs at firms which formed an integral part of the airport’s operations; 8,500 jobs within those firms’ supply chains; and 8,800 “induced” jobs that were supported by workers’ spending. So, for every job directly supported by the operations of the airport, another 1.6 are supported elsewhere in the UK economy. As a result, whilst the airport does facilitate spend outside of Luton it, in turn, supports the local economy through those employed at the airport and related businesses spending their wages in and around Luton and also by bringing in tourists who spend in the local and wider area.

Table 4 Noise

Issue	Response
Why does the application not take into account LPA's noise guidance?	<p>The assessment of noise within the Updated ES Noise Chapter Doc Ref. 41431RR20V3NA has been undertaken in accordance with the latest policy and guidance on aviation noise, including the Noise Policy Statement for England, Planning Practice Guidance, Aviation Policy Framework and the Consultation Response on UK Airspace Policy.</p> <p>The guidance available from Luton Council is found online https://m.luton.gov.uk/Page/Show/Environment/Environmental%20health/Noise/Pages/Noise-and-planning.aspx. The Aviation page on the Luton Council website was not functional during the time of the assessment. Planning and Noise guidance provides high level advice across a range of elements including what a noise report should cover, surveys and assessment criteria. Without referring directly to the guidance, the assessment within the Updated ES Noise Chapter Doc Ref. 41431RR20V3NA, accords to the guidance within where relevant</p>
How can the improvements in noise anticipated after 2028 be secured when quieter aircraft do not currently exist in the airlines' ownership or it is not within their intention to deploy and operate them from London Luton Airport?	<p>The 19 mppa application proposes modifications to the existing day and nighttime noise contours. It is anticipated that a condition will be applied to the permission [if granted] specifying that these revised contours cannot be breached [As presented in Figure 8.7 and 8.7 within Appendices to the ES, Ref. 41431RR21V2].</p> <p>Whilst outside of LLAOL's direct control, it is envisaged that the aircraft fleet mix will continue to move towards quieter aircraft in the future and therefore improvements will be made to noise contours.</p>
Rather than the noise insulation funding set out in the ES, the extent of eligible dwellings and other noise sensitive property shall be determined by the Local Planning Authority's noise limits as the qualifying criteria with no time expiry limit.	<p>The eligibility for sound insulation detailed in the Updated ES Noise Chapter Doc Ref. 41431RR20V3NA is based the requirements set by the LPA as part of the previous planning consent. The condition requires the airport to review it effectiveness and update as necessary which is done periodically but at least during every contractor renewal period where the airport reviews noise insulating mediums available and includes or removes as necessary. During the latest contractor renewal process additional mediums</p>

Issue	Response
<p>Concern that an increase in road traffic as a result of increased passenger levels will increase noise levels experienced by dwellings and noise sensitive properties.</p>	<p>such as sound attenuated trickle vents and loft insulation were added to the list of options.</p> <p>The EIA screening document Doc Ref. 41431-WOOD-ZZ-XX-RP-O-0001_S2_P01.2, page 27 and Appendix C submitted to LBC in September 2020 considered the potential for increases in road traffic due to additional passengers at the airport to increase noise levels. The document demonstrated that there would not be a significant adverse effect from road traffic noise increases and as such this was factor was not considered further within the EIA.</p>
<p>The proposals are not in line with government policy which seeks to minimise and where possible reduce the number of people significantly affected by aircraft noise.</p>	<p>The overall objective of the UK Aviation Noise Policy [ANP] [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/153776/aviation-policy-framework.pdf], confirmed by the Consultation Response on Legislation for Enforcing the Development of Airspace Change Proposals [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/841247/consultation-response-on-legislation-for-enforcing-the-development-of-airspace-change-proposals.pdf] is to limit noise and where possible reduce the number of people in the UK significantly affected by aircraft noise. This policy objective is integrated into Luton Local Plan Policy LLP 6, where it states that Proposals for development will only be supported where [...] proposals: v) achieve further noise reduction or no material increase in day or night-time noise. There appears to be a conflict between this and the requirement for growth in the aviation industry which is noted in the National Planning Policy Framework [https://www.gov.uk/government/publications/national-planning-policy-framework--2], the ANP, Consultation Response document and General Aviation Strategy [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/417334/General_Aviation_Strategy.pdf]. However, this conflict only arises via an implication from the above policy text. In the context of sustainable development, and growth of airports, the overall approach to limit and reduce the number significantly affected does not mean that no additional significant affect can be permitted, where that is a</p>

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necessary result in support of sustainable development. It is noted in LLP6 that the criteria should be applied "where applicable / appropriate having regard to the nature and scale of such proposals". At least by 2028, the 19 mppa Development Proposal does not materially increase noise above the 18 mppa scenario [this is assumed to be <1 dB difference]. In addition, the 19 mppa scenario for 2024 is quieter than the 2021 18 mppa scenario. On this basis, the scale of the development would not be considered sufficient to enact the criteria requirements in LLP6.

Also, whilst not policy yet, the fluidity of noise caps is discussed in the Government documentation Aviation 2050: The future of UK aviation: A consultation (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/841247/consultation-response-on-legislation-for-enforcing-the-development-of-airspace-change-proposals.pdf). It states that a new measure will be to routinely set "noise caps as part of planning approvals (for increase in passengers or flights). The aim is to balance noise and growth and to provide future certainty over noise levels to communities. It is important that caps are subject to periodic review to ensure they remain relevant and continue to strike a fair balance by taking account of actual growth and the introduction of new aircraft technology."

It is curious that the information provided does not enable a clear distinction between noise effects that are positive or adverse. There is one column covering noise changes between -0.9 and +0.9 dB, and while it is accepted that this covers a range that might be considered a negligible change, it would be more conventional to clearly distinguish between changes that are -ve, thereby indicating a betterment, and those which are +ve and thereby indicating a worsening.

The comparison **tables 8.10 to 8.21 within** the Updated ES Noise Chapter **Doc Ref. 41431RR20V3NA** cover both increases and decreases. However, as stated in the Noise Review [VC 20-07/M1-0], the distinction is not made between changes in noise level of -0.9 and +0.9. These changes would be considered negligible whether they are slightly positive or slightly negative. It is not considered that the addition of this information would influence the assessment of the application in terms of changes to noise.

Suggestion that the airport should assemble a Noise Envelope Design Group or similar body to work towards development of a noise envelope for the 19mppa environment

The updated Condition 10 wording set out in the **Planning Statement (document reference 41431EP12V3)** that accompanied the 19 mppa application forms the basis of a noise envelope for the operation of the airport at 19mppa.

Issue	Response
<p>Concern that the airport has not extended mitigation schemes such as insulation or grants to the local council for community improvements to areas in Buckinghamshire most impacted by aircraft noise, such as Dagnall</p>	<p>The compensation scheme and community funds are provided to those most affected based on noise modelling of the Proposed Amendments. This includes residences who would experience noise above the Significant Observable Adverse Effect Levels [SOAEL] of 63 dB during the daytime and 55 dB during the night-time. For communities between the Lowest Observable Adverse Effect Levels [LOAEL] of 51 dBA for daytime and 45 dBA for night-time and the SOAEL levels, LLAOL would be providing grants for the improvement of community life. Outside of these areas, adverse effects would not be sufficiently tangible to require mitigation. There are no parts of Buckinghamshire that would be within the LOAEL noise contour areas.</p>
<p>Why have different noise calibration values been used in the “current condition limits” model to the rest of the models.</p>	<p>Table 3 in Appendix 8C of the Updated ES Noise Chapter Doc Ref. 41431RR20V3NA shows the corrections to different aircraft and how these have changed since the 2012 ES. The noise level differences between the Airbus A321neo and Airbus A321ceo are different for the current condition limits ['Current Short-Term Limit' in Table 3] in comparison with all other scenarios. The current short-term condition limits have been modelled for previous iterations of submissions to amend conditions. These current condition models have been kept consistent throughout the various submissions as the aircraft mix used to form these models have not changed. However, measurement data has become available and has been used to correct the aircraft noise in other scenarios to be louder based on this data. The fact that the short-term condition limits still use the older, less conservative corrections means that the assessment of comparing the Development Cases against the current condition provides a larger difference, i.e. a greater adverse impact.</p>
<p>Suggestion that the applicant should adopt some of the principles and commitments set out within Heathrow's Environmentally Managed Growth approach.</p>	<p>Heathrow's consultation document Environmentally Managed Growth describes the framework in which Heathrow would operate within environmental limits, including aviation noise. The document presents proposals for ongoing monitoring, restrictions on aircraft via quota counts and an establishment of an Independent Scrutiny Panel. An environmental envelope is proposed to control noise, allowing growth on the basis that it meets the envelope limits. Many of the principals align with those at Luton Airport as specified in the Noise Action Plan [https://www.london-</p>

Issue

Response

Have LLAOL taken the delayed fleet update rate into their noise contour analysis?

luton.co.uk/LondonLuton/files/b5/b53019bb-a021-43c1-bf07-620048371966.pdf]. The current Noise Action Plan, which runs up to 2023, includes for operational procedures, including but not limited to, movement restrictions and quota count limits (limiting louder aircraft); these would be updated as part of the embedded measures outlined in the Updated ES Noise Chapter **Doc Ref. 41431RR20V3NA**. LLA has monitoring terminals located in the neighbouring community to measure noise, track infringements and to aid in complaint investigation. LLA does not currently have an Independent Scrutiny Panel. However, LLA does have the London Luton Airport Consultative Committee (LLACC) the aim of which 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 there is also a Noise and Track Sub-Committee (NTSC) which reviews the noise impacts specifically, voices concerns of the local communities and works with the airport on ways to reduce the impacts. These committees are made up of councillors, local community and commercial groups The airport also holds public surgeries every 2 months providing local residences and Councillors an opportunity to meet the Flight Operations team and discuss concerns. In addition, LLA is a member of the Sustainable Aviation group, and the Noise Working Group therein, engaging this committee to limit and where possible reduce aviation impact noise.

Aviation operation has been affected by two main slowdowns. One is the delay to the modernisation of the fleet using the airport, partially because of the grounding of the B737-Max and partially from the slower uptake of modernised aircraft from operators. The other is the COVID-19 pandemic, which has resulted in a large slump to passenger flights. It is not possible to predict with certainty how LLA and the operators using it will recover from these factors. However, an estimation for fleet mix modernisation and recovery of passenger flights has been included in the noise modelling from 2021 onwards. This is shown in the first year of 19mppa operation being 2024 as assessed in the Updated ES Noise Chapter **Doc Ref. 41431RR20V3NA** as it is expected to take that long for passenger numbers to build up to and surpass the 18mppa level.

Issue	Response
The planning application is not in accordance with the Airport's most recent Airport Noise Action Plan.	There are differences between the airport's Noise Action Plan and this application; for instance the change to Condition 10 relating to the noise contour area limits. The Environmental Noise (England) Regulations 2006 allows for the update of the Noise Action Plan if required by developments at the Airport. It is understood that there will be an update to the Noise Action Plan following the grant of planning permission to reflect the latest position.
The main commercial airlines operating out of Luton are now flying larger planes (A321a) than before. Larger aircraft make more noise than smaller types. So how can future years produce less noise going forwards (less than 2021)?	<p>As part of the planning application for the proposed increase in passengers to 19mppa an assessment of noise effects was undertaken. This was presented in the Updated ES Noise Chapter Doc Ref. 41431RR20V3NA.</p> <p>The assessment considered the capacity and types of aircraft likely to be using the airport in future years and drew upon the findings undertaken to date which demonstrate that the A321 neo and A320 neo are quieter than the A321 ceo and Boeing 737 Max respectively.</p>
Modern aircraft, such as the Airbus A321neo, are just as loud as the older-engine planes .	The latest noise modelling work, including the L_{Aeq} contours within the updated Chapter 8, was expanded to allow for the measured results in 2019 for the Airbus A321neo upon which validation was based. This meant that the performance of the modernised aircraft was taken as very similar to the Airbus A321ceo on arrival, and slightly quieter (1 – 2 dB) on departure.

Table 5 Planning

Issue	Response
<p>Concern that the proposals will take spending power and jobs out of the local economy as a result of low-cost tourist flights</p>	<p>Whilst international travel will result in spend occurring overseas, the airport also brings in tourists who contribute to the local economy and wider UK economy. The airport also provides thousands of jobs for people in and around Luton who will support the local economy by spending their wages in local and UK businesses. The economic benefits of the airport are highlighted in the Chapter 2 of the submitted Planning Statement (document reference 41431EP12V3) which emphasises the important role the airport plays in the economy of the local area and the surrounding sub-regions. As stated at paragraph 2.1.4 of the Planning Statement the greatest impacts are felt within the immediate vicinity of the airport with a contribution of £957 million in Bedfordshire in 2019. In terms of jobs paragraph 2.1.6 of the Planning Statement highlights that the airport is estimated to have sustained a total of 28,200 jobs across the UK in 2019. This comprised 10,900 “direct” jobs at firms which formed an integral part of the airport’s operations; 8,500 jobs within those firms’ supply chains; and 8,800 “induced” jobs that were supported by workers’ spending. So, for every job directly supported by the operations of the airport, another 1.6 are supported elsewhere in the UK economy. As a result, whilst the airport does facilitate spend outside of Luton it, in turn, supports the local economy by bringing in tourists who spend in the local and wider area and supports jobs for people employed at the airport and related businesses who spend their wages in and around Luton.</p>
<p>Concern that as a result of current reduced passenger numbers due to Covid, there is no evidence that the 18mppa cap will be reached before 2026 as original planned. The application is therefore not needed and is premature.</p>	<p>Whilst Covid-19 has resulted in temporary implications for travel volumes, Chapter 4 of the submitted Planning Statement (document reference 41431EP12V3) makes clear that it is anticipated the airport will recover relatively swiftly from the temporary COVID-19 implications, having been the second busiest airport in the UK by passenger numbers during the travel restrictions (e.g., May and June 2020) after Heathrow. Paragraph 4.2.6 to 4.2.10 and Figure 4.3 of the Planning Statement explains that based on forecasts by the Airports Council International (ACI) it is expected that LLA will recover to 18mppa sometime in 2023 and grow beyond 18mppa in 2024. As such, the 19mppa Proposed Amendments is likely to</p>
<p>Concern that the prediction that 19mppa capacity will be required by 2024 is premature and unrealistic as it is unclear when demand will return to pre-pandemic conditions</p>	

Issue	Response
<p>Concern that the effects of the double in capacity between 2013 and 2019 have not been mitigated and won't be until airspace is redesigned</p>	<p>be realised in 2024. There is, therefore, a need for the proposed increase to 19mppa.</p> <p>Between 2013 and 2019 passenger numbers at LLA increased from 10.5mppa to 18mppa. This was in line with planning permissions (12/01400/FUL). LLA have implemented a number of mitigation measures to reduce the number of flights and attempt to stay within the remit of Condition 10 of permission 15/00950/VARCON. These measures are set out in Paragraph 4.3.17 to 4.3.27 of the Planning Statement (document reference 41431EP12V3) and include incentivising aircraft, fleet modernisation with differential charging, preventing the growth of commercial/cargo flights at night (beyond those scheduled) and preventing operators shifting existing allocated slots from the daytime (06:00-21:59 GMT) into the night-time (22:00-05:59 GMT) between 1st June and 30th September. The full list of measures is set out in Paragraph 4.3.17 to 4.3.27 of the Planning Statement (document reference 41431EP12V3).</p> <p>In terms of airspace redesign, in combination with NATS, LLA undertook a consultation (between 19th October 2020 and 5th February 2021) on its future airspace change proposals for arrivals at the airport. The objective of the airspace change is to get higher quicker reducing the noise impacts. Paragraph 4.3.15 of the Planning Statement (document reference 41431EP12V3) explains that airspace change for LLA should mean a reduction in the number of late arriving aircraft and therefore further noise reductions.</p>
<p>Suggestion that the planning application be delayed until the publication of the Government's holistic aviation recovery strategy</p>	<p>The Government's Aviation Strategy was due to be published in Autumn 2020 but has to date not been forthcoming. Notwithstanding this delay, at a local level, Strategic Objective 1 of the Luton Local Plan (adopted November 2017) confirms development plan support in principle for the further growth of LLA. Policy LLP6 is the principal policy within the development plan that relates to the expansion of LLA. The policy sets out a list of criteria that must be met for proposals for development at LLA to be supported (where applicable/ appropriate and having regard to the nature and scale of such proposals). Chapter 6 of the Planning Statement</p>

Issue	Response
Concern that the proposals will harm the amenity of the Chilterns AONB due to noise from planes.	<p>(document reference 41431EP12V3), and in particular Table 6.1 sets out how the Proposed Amendments comply with policy LLP6.</p> <p>The Environmental Statement (document reference 41431RR20V1) submitted as part of the 19mppa application has considered the effects of the Proposed Amendments on the Chilterns AONB. Paragraph 4.4.22 of the Environmental Statement contain this assessment and make clear that the proximity of the Chilterns AONB is unlikely to be the subject of any adverse noise effects,</p> <p>The Environmental Statement at paragraph 4.4.23 does acknowledge that there will be a slight increase in the extent of the 57 dB daytime noise contour over the Chilterns AONB for the 2024 19mppa scenario, however this will decrease in the 2028 19mppa scenario to broadly equivalent levels experienced today.</p> <p>The height of aircraft passing over the AONB varies depending on location. Between Hitchin and Toddington aircraft fly at an average of 5,000 ft. Between Ivinghoe and Berkhamsted arrivals average 4,000 ft and departures 8,000 ft. This is above the 4,000 ft threshold specified in Department for Transport (2017) Air Navigation Guidance 2017⁶ and as such effects are deemed to be insignificant. The Proposed Amendments will result in no change to this prescribed flight height, or present flight paths taken by aircraft. Moreover, current guidance also states that 'given the finite amount of airspace available, it will not always be possible to avoid overflying National Parks or AONB, and there are no legislative requirements to do so as this would be impractical'. As such, nor further effects were identified which required assessment.</p>
Will the new masterplan, submitted alongside the application, constitute a masterplan adopted by Luton Council?	<p>Table 6.1 of the Planning Statement (document reference 41431EP12V3) explains that an up-to-date Masterplan produced by LLAOL for 19mppa has been submitted as part of the 19mppa application and the</p>

6 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/653978/air-navigation-guidance-2017.pdf

Issue	Response
	<p>Proposed Amendments are in accordance with this document. As such, it is intended that the masterplan will be adopted by Luton Council.</p>
<p>The Proposed Amendments s do not comply with Policy LLP38 as the mitigation proposed to reduce noise is inadequate.</p>	<p>The Planning Statement (document reference 41431EP12V3) at paragraphs 6.5.49 and 6.5.50 identifies that no properties will experience unacceptable noise levels and no properties will experience a significant adverse effect from the Proposed Amendments in the day. However, the expansion will lead to significant noise effects at night-time because of an increase in noise compared to the existing situation above a level that is identified to have potential significant health effects. In order to minimise this effect, all properties that will experience a level that is identified to have potential significant health effects will be eligible for noise insulation to minimise the effects of noise. In addition, the airport will continue to implement current noise mitigation measures. With this mitigation the Proposed Amendments accords with Policy LLP38 of the Development Plan and the NPPF.</p>
<p>Concern that the increase in the number of dwellings that will experience SOAEL noise levels during the night-time is not in keeping with the Luton Local Plan Policy LLP6 which expects the airport to achieve further noise reduction, or no material increase in day or night-time noise or otherwise cause excessive noise including ground noise at any time of the day or night</p>	<p>The Planning Statement (document reference 41431EP12V3) at paragraphs 6.5.49 and 6.5.50 identifies that no properties will experience unacceptable noise levels and no properties will experience a significant adverse effect from the Proposed Amendments in the day. However, the expansion will lead to significant noise effects at night-time because of an increase in noise compared to the existing situation above a level that is identified to have potential significant health effects. In order to minimise this effect, all properties that will experience a level that is identified to have potential significant health effects will be eligible for noise insulation to minimise the effects of noise. In addition, the airport will continue to implement current noise mitigation measures. With this mitigation the Proposed Amendments accords with Policy LLP6 of the Development Plan and the NPPF.</p>
<p>The project timeframe should be reprogrammed to ensure that any decision is made in the context of new Government aviation policy.</p>	<p>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</p>

Issue

Response

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

Issue	Response
	project programme does not need to be reprogrammed as 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.
There is no assumption within Figure 6.1 of MBU Government policy document that a best use policy is intended to provide additional capacity above baselines in the period to 2030 or indeed that any is needed.	Table 6.1 in <i>Beyond the horizon The future of UK aviation: Making best use of existing runways (2018)</i> ("MBU") is a forecast based on a model of allowing all airports to make best use of their existing runway capacity. It is forecast at a point in time (2017) and does not represent a cap or limit on the growth of passengers per annum. As a result, there is no policy restriction on the growth of passengers at airports contained within MBU.

Table 6 Transport

Issue	Response
How will the Airport work towards increasing cycle use by staff and provision of cycle facilities?	<p>The Travel Plan (document reference 41431MP18V2) submitted as part of the 19mppa planning application, included a set of measures targeting increased cycle use by employees through supporting reduced costs of cycles and equipment, as well as events aimed towards promoting cycling and providing space for training and maintenance. A table (Table 8.2) indicating the body responsible for fulfilling each of the measures was presented in Section 8 and the timescales for all measures, including those specific to cycling, were presented in Table 10.1 included in Section 10 of the document.</p> <p>To further encourage the use of cycling as the preferred mode for staff, LLA is also lobbying the local authority for improvements in cycle lane access to and from the airport.</p>
The suggestion that the Luton DART system will reduce congestion in the local road network cannot be established, especially without knowing the fare structure and take up rate for the DART.	<p>It is reasonable to assume that the introduction of the DART system would have some positive impact on the reduction of road traffic. However, the scope of the forecast analysis included in the Transport Assessment (document reference 41431MP17V2) was to establish the worst-case scenario in terms of the potential traffic increase resulting from the airport expansion. This scenario, as stated in Chapter 10, Section 10.2, did not account for the opening of DART in 2021. The results of the analysis, presented in Section 10.3 of Chapter 10 and summarised in Chapter 11, show that the forecasted increase in traffic volumes is not significant enough to have a meaningful impact on congestion regardless of the impact of DART.</p>
Concern that the Proposed Amendments s will lead to an increase in traffic and congestion on local roads and in local towns.	<p>The forecasting analysis, included in Chapter 10 of the Transport Assessment (document reference 41431MP17V2), was based on the worst-case scenario of the potential traffic increase resulting from the airport expansion. The results of this analysis, included in Section 10.3, showed that the predicted increase in traffic was not significant enough to have a likely meaningful impact on congestion. This, in combination with targets aimed at increasing Cycling and Public Transport use for staff and passengers included in Chapter 6 and summarised in Section 6.3 of the</p>

Issue	Response
Concern that no details or proposals are provided for the proposed changes to Condition 22 and 24.	<p>Travel Plan*, provides sufficient evidence that the proposed scheme will not lead to an increase in traffic and congestion on local roads and in local towns.</p> <p>Condition 22 refers to the Car Parking Management Plan which is included as an appendix in both the Transport Assessment (document reference 41431MP17V2) and the Travel Plan (document reference 41431MP18V2)</p> <p>Condition 24 refers to the Travel Plan* which has also been submitted as part of the application under Document Reference Number 41431MP18V2. Therefore, both conditions have been addressed and submitted accordingly.</p>
Concern that the airport has not addressed the issues of ‘fly-parking’ in surrounding communities	<p>Any issues related to “fly-parking” would fall outside of the scope of this planning application. However, the situation will be continuously monitored by Luton Council and LLAOL through the 19mppa Car Parking Management Plan (Doc. Ref. 41431-WOOD-XX-XX-TN-OT-0001_S3_P04), which is included as an appendix to the Transport Assessment (document reference 41431MP17V2) and the Travel Plan (document reference 41431MP18V2)</p>
Concern about the reasoning for constructing additional multistorey car parks if the airport anticipates that the public will move to public transport	<p>The Transport Assessment (document reference 41431MP17V2) submitted as part of the 19mppa application states in Section 10.4 of Chapter 10 that the existing 18mppa passenger Car Parking Management Strategy was deemed appropriate for the increased car parking demand related to 19mppa passengers. Furthermore, the 19mppa Car Parking Management Plan***, which is included as an appendix to the Transport Assessment** and the Travel Plan*, also states in its introduction that the growth related to 19mppa could be accommodated without any new on-airport infrastructure, as well as stating that no new parking spaces were proposed specifically in connection with this application. The submitted transport related documents do not suggest at any point that additional multistorey car parks will be required.</p>
Concern that the existing and proposed road and rail transport systems do not have the capacity to accommodate the increase in	<p>The forecasting analysis, included in Chapter 10 of the Transport Assessment (document reference 41431MP17V2), was based on the</p>

Issue	Response
passengers, particularly the Thameslink Service and the motorway network	<p>worst-case scenario of the potential traffic increase resulting from the airport expansion. The results of this analysis, included in Section 10.3, showed that the predicted increase in traffic was not significant enough to have a likely meaningful impact on congestion. This, in combination with targets aimed at increasing Cycling and Public Transport use for staff and passengers included in Chapter 6 and summarised in Section 6.3 of the Travel Plan*, provides sufficient evidence that the proposed scheme will not lead to an increase in traffic and congestion on the traffic network.</p> <p>In relation to the rail network, this will be monitored through the Travel Plan (document reference 41431MP18V2) between LLAOL, Luton Council and the relevant Public Transport operators and can be addressed accordingly to increase capacity should the need arise.</p>
Concern that the M1 junction 10 is close to capacity despite recent expansion	<p>The forecasting analysis, included in Chapter 10 of the Transport Assessment (document reference 41431MP17V2), was based on the worst-case scenario of the potential traffic increase resulting from the airport expansion. The results of this analysis, included in Section 10.3, showed that the predicted increase in traffic was not significant enough to have a likely meaningful impact on congestion. This, in combination with targets aimed at increasing Cycling and Public Transport use for staff and passengers included in Chapter 6 and summarised in Section 6.3 of the Travel Plan (document reference 41431MP18V2) provides sufficient evidence that the proposed scheme will not lead to an increase in traffic and congestion on the existing traffic network.</p> <p>The specific concerns in relation to the capacity of the M1 Junction 10 have been discussed with the highways authority (Highways England) and it was agreed that the level of traffic volume increase at this location would be unlikely have a meaningful impact on the operation of the junction. As a result, no further mitigation was deemed necessary by Highways England.</p>
Suggestion that significant investment will be required to the road network outside of the Luton Council area which should be financed by the applicant	<p>The forecasting analysis, included in Chapter 10 of the Transport Assessment (document reference 41431MP17V2), was based on the worst-case scenario of the potential traffic increase resulting from the airport</p>

Issue	Response
	<p>expansion. The results of this analysis, included in Section 10.3, showed that the predicted increase in traffic was not significant enough to have a likely meaningful impact on congestion. This, in combination with targets aimed at increasing Cycling and Public Transport use for staff and passengers included in Chapter 6 and summarised in Section 6.3 of the Travel Plan (document reference 41431MP18V2), provides sufficient evidence that the proposed scheme will not lead to an increase in traffic and congestion on the existing traffic network. Therefore, there is no evidence that suggests any additional significant investment will be required as a result of the proposed scheme.</p>
<p>Why is the applicant constructing additional multistorey car parks if the airport anticipates that the public will move to public transport?</p>	<p>The 19mppa planning application states in the Transport Assessment (document reference 41431MP17V2), Section 10.4 of Chapter 10, that the existing car parking capacity will be sufficient to cope with the growth of passengers at Luton Airport to 19mppa. Furthermore, the Car Parking Management Plan (Doc. Ref. 41431-WOOD-XX-XX-TN-OT-0001_S3_P04), which is included as an appendix to the Transport Assessment, also states in its introduction that no new parking infrastructure or parking spaces were proposed specifically as part of this application. The submitted transport related documents do not suggest at any point that additional multistorey car parks will be required.</p>
<p>Concern that the Airport's Travel Plan only covers a small part of its catchment area, meaning the whole picture is unknown so the most effective solutions cannot be identified and developed.</p>	<p>Travel Plan (document reference 41431MP18V2) submitted with the 19mppa planning application does not limit its catchment area to a specific range. Instead, it aims to establish measures and targets that are relevant to all passengers and staff travelling to and from the airport, regardless of their origin and destination. The document includes an overview of all relevant policies at National and Local levels. There is no statement in the entire document that limits the objectives and targets set in Chapter 6, to a specific catchment area.</p>
<p>Suggestion that the airport should pay a small subsidy to bus companies to introduce additional services between settlements, such as Aylesbury, and the airport</p>	<p>The airport is fully committed to monitoring future requirements for growth in public transport through the Travel Plan (document reference 41431MP18V2) and in collaboration with LLAOL, Luton Council and public transport operators. Should the need arise to introduce additional services</p>

Issue	Response
	based on increased demand, this will be addressed and managed accordingly.

Table 7 **Airport**

Issue	Response
The Airport should provide details of the number of aircraft movements used in the various noise contour models	Aircraft flows used to create the noise contours have been provided in Appendix 8B of the updated chapter 8
The application uses out of date ACI post-COVID recovery forecasts which are over optimistic.	The ACI post recovery forecast anticipates a Europe wide return to pre-pandemic levels may not occur until 2024, however given LLA's low cost operator customer base as well as its proximity to London, it is anticipated that the return to pre-pandemic levels will be much faster than other UK airports.
The qualifying radius for the existing noise insulation scheme should be extended so that it includes affected communities on the final approach. The Community Trust Fund boundaries should be extended beyond the historic Aylesbury Vale District boundary.	<p>The criteria used for determining eligibility for the Noise Insulation Scheme is currently aligned to the government guidance requiring noise impacts be mitigated for those significantly affected by noise. There are currently no plans to extend the boundary at this time but will be reviewed after the existing eligible dwellings are insulated.</p> <p>There is currently no scope to increase the boundary of the CTF however we continually review this with BLCF and wherever possible will seek to ensure as many people benefit from the trust fund as possible</p>
Concern that noise estimates in the EIA rely significantly on aircraft replacement rates, which are likely to be slower than assumed in the EIA because of the current financial climate and competition between airports for airlines to operate quieter aircraft	The data used in the fleet mix forecast comes from the fleet renewal data published by the airlines. In each year, fleet assumptions were changed to reflect the published fleet replacement plans of each of the major airlines, with assumptions made where fleet plans were unclear. As easyJet, Wizz and Ryanair publish fleet renewal plans as part of their annual reporting over 90% of fleet renewal assumptions were based on publicly available, and verifiable information.
Concern that the COVID-19 pandemic will delay fleet modernisation	
Concern that the airport has refused to provide growth projections for mid-haul routes using wide-body aircraft, which are slower and noisier on take-off and that the EIA Vol 2 suggests the use of larger aircraft will mitigate the increase in passenger numbers	The airport does not expect any growth on mid-haul wide-body aircraft. The reference to larger aircraft is in regard to a shift to aircraft with seat capacity of 189-250 as opposed to those with seat capacity of 154-189 i.e. B737 to B738 MAX and A319/A320 to A320NEO/A321NEO

Issue	Response
Concern that conflicts of airspace between Luton Airport and Heathrow and London City Airports' flight patterns have led to aircraft noise becoming a major issue for residents of St Albans District in recent year	The airport is an integral part of the national airspace modernisation programme where any issues or conflict in airspace routings are to be resolved
Concern that the airport has no control over the replacement of noisier aircraft with quieter models and that this is likely to take longer due to current pressures on airline budgets	The airport is rolling out differential charging within its terms and conditions of use to incentivise the use of quieter next gen aircraft.
Concern that if there is a delay in securing larger aircraft, the airport will operate a greater number of smaller aircraft which will increase noise levels and put early pressure on noise constraints	There is currently no indication that there will be a delay to securing larger aircraft – see previous answer re modernisation
Suggestion for a legally binding cap on aircraft movements within current planning constraints, in order to act as an incentive for fleet modernisation	There is currently no scope to increase the boundary of the CTF however we continually review this with BLCF and wherever possible will seek to ensure as many people benefit from the trust fund as possible.
Concern that the impact of the change of fleet mix on the size of the public safety zone has not been assessed and that if the new fleet mix is delayed and ATMs increase more than forecast, then this adds to the urgency of reassessing the size of the zone	The expected change in fleet mix or the scenario presented does not change the relevant inputs used in the PSZ assessment as they are based on aircraft size class (Class III-IV), the latest PSZ assessment assumed ATM totals of approximately 156,000 ATMs and the forecasts given in this application do not expect to exceed this therefore a new PSZ is not required for this application.
What additional steps can the Airport take to encourage people to be more willing to accept the mitigation provided through the Noise Insulation Fund?	<p>The airport reviews the effectiveness and uptake of the scheme regularly and where possible increases the types of insulation available however most people refuse the scheme based on the requirement of ventilation units in the property which are required under building regulations to maintain air flow in the property which is reduced as a result of fitting high performance or secondary glazing.</p> <p>The Government has already suggested some changes to insulation policy in the Aviation 2050 consultation paper. At the time of writing, it is unclear how the Government intends to progress the proposals in the Aviation 2050 consultation document in light of the Covid-19 pandemic, the airport will</p>

Issue	Response
	amend its scheme to comply with whatever policy requirements are introduced relating to insulation when they are published
Concern that the Airport Operators Association does not expect passenger projections to return to pre-Covid levels until 2025 at the earliest	The AOA Airport Recovery Plan published in February 2021 suggests that a UK wide return to pre-pandemic levels may not occur until 2025, however given LLA's low-cost operator customer base as well as its proximity to London, it is anticipated that the return to pre-pandemic levels will be much faster than other UK airports.
Clarity on the operation and beneficiaries to the proposed grants is needed, and the amounts are considered derisory.	The applicant has an established process for administering community funding through the BLCF and would adopt the same process to assess and administer these one off grants, the beneficiaries would be local (parish or borough) councils that sit between the LOAEL and SOAEL contour boundaries of the 2021 contours as detailed in the application.
Failure to offer insulation to 100% of those properties significantly adversely affected renders this mitigation as unacceptable.	The Noise insulation scheme offers insulation to properties beyond those "significantly effected". The significantly effected contours are defined as the 63dB daytime and 55dB night time however the noise insulation scheme covers the 63dB daytime and the 55dB night time as well as those dwellings where the airborne noise level in excess of 90 dB SEL occurs externally at an annual average frequency of once or more during the night. (see Appendix 8F of the application). We have also proposed to ensure that the eligibility contour will remain fixed for 6 years as the worst intermediate year, meaning that if properties within the worst intermediate year contour fall outside the contour in subsequent years before they are offered insulation, they will remain eligible. (see 8.14.7 of the environmental statement).
The Master Plan is considered not to be fit-for-purpose in its current form and requires further work and consultation.	The masterplan was consulted on publicly between the 7th October 2020 and the 11th November 2020. The applicant can confirm that all feedback which was received as part of the non-statutory consultation for the 19mppa Project was taken into account within the development of the Environmental Statement which was submitted as part of the suite of documents which accompanied the Planning Application. The consultation was not a referendum on whether the application should be submitted.

Issue	Response
LLAOL should explore with stakeholders and communities the extent to which it is possible to set up an Environmental Managed Growth approach for the 19 mppa proposal.	All future growth shall be managed in line with the environmental restrictions imposed within the planning conditions
Aircraft movement numbers should be restricted by means of an annual ATM movement limit.	All of the limits proposed including nighttime movement and QC limits as well as noise contours and passenger limits combined create a limit on the number of annual aircraft movements.
The Airport has breached its planning controls not as a result of weather phenomenon but as a result of their failure to build adequate capacity into their scheduling and their pursuit of growth and profit at any cost.	The reasons for the breaches of the noise contours over the recent years are all detailed and explained in section 2.1.12-15 of the environmental statement
Noise has increased markedly since the RNAV westerly flight path implementation. Despite numerous objections, not a single measure has been put in place to mitigate this.	The RNAV Airspace change is not related to this application and the CAA have already reached a decision on the post implementation review.
Why is the Airport allowing regular off-track flight violations and subsequent failures to follow the Noise Preferential Routes. This is causing many residents totally unnecessary noise disturbance.	We have a noise and track violation system in place and investigate all off track occurrences and issue penalties accordingly
A Noise Reduction Strategy should be produced and consulted upon.	See section 3.2.14 of the environmental statement which defines a commitment to submit a noise contour reduction strategy within 12 months of approval of the application.
The noise forecasts in the revised ES Noise Chapter, are based on a much quicker recovery than expected, and are thus flawed.	The noise forecasts are based on the information available at the time and are in line with CAA and ACI forecasts