

Statutory Consultation 2022

2019 Statutory Consultation Feedback Report

Contents

	Page	
1	Introduction	1
1.1	The Proposal	1
1.2	Project background	1
1.3	Purpose of this document	3
1.4	Structure of document	3
2	Statutory Consultation Process	4
2.1	Purpose of the Consultation	4
2.2	When did the consultation take place?	4
2.3	Consultation Mailing Zone	4
2.4	Who was consulted?	5
2.5	Consultation Methods	9
2.6	Engagement Methods	12
2.7	Document Inspection Venues	16
2.8	Notification	18
2.9	Local Authority Briefings	21
2.10	Businesses	21
2.11	Hard to Reach Groups	21
3	Feedback received	22
4	Overview of feedback	24
4.1	Summary of key changes made in response to feedback	24
4.2	Need Case and Forecasts	25
4.3	Climate change and carbon	29
4.4	Noise	33
4.5	Flight paths and Fleet Mix	36
4.6	Air Quality	40
4.7	Natural Environment and Landscape	42
4.8	Historic Environment	46
4.9	Water and Drainage	47
4.10	Employment and Economics	51
4.11	The Design	53
4.12	Wigmore Valley Park	55
4.13	Impacts on Local Communities	58
4.14	Passenger Experience	60
4.15	Surface Access	62
4.16	Land and Compensation	66
4.17	Construction and Phasing	69

4.18	Planning	72
4.19	Consultation	74
5	Next steps	77
Appendix A: Response to 2019 Feedback		i
Appendix B: Response to WSP comments on the PEIR		ii
Glossary and Abbreviations		iii

Tables

Table 2.1	Prescribed Consultation bodies
Table 2.2	Relevant Statutory Undertakers
Table 2.3:	Consultation Documents
Table 2.4:	Consultation Events
Table 2.5:	Document Inspection Venues
Table 2.6:	Newspapers with published notices of consultation
Table 4.1:	Need case key issues
Table 4.2:	Climate change and carbon key issues
Table 4.3:	Noise key issues
Table 4.4:	Flight paths and fleet mix key issues
Table 4.5:	Air Quality key issues
Table 4.6:	Natural Environment and Landscape key issues
Table 4.7:	Historic Environment key issues
Table 4.8:	Water and Drainage key issues
Table 4.9:	Employment and Economics Key Issues
Table 4.10:	Design key issues
Table 4.11:	Wigmore Valley Park key issues
Table 4.12:	Local Community key issues
Table 4.13:	Passenger Experience key issues
Table 4.14:	Surface Access key issues
Table 4.15:	Land and compensation key issues
Table 4.16:	Construction and Phasing key issues
Table 4.17:	Planning key issues
Table 4.18:	Consultation key issues

Figures

2.3.4	Inset 2.1: 2019 Consultation Mailing Zone
-------	---

1 INTRODUCTION

1.1 The Proposal

1.1.1 We, Luton Rising (a trading name of London Luton Airport Limited) are seeking to make best use of the existing runway at London Luton Airport by constructing a new terminal and associated infrastructure to increase the number of flights and passengers the airport can handle (the Proposed Development). The current permitted capacity of the airport is 18 million passengers per annum (mppa), and the Proposed Development seeks to increase this to 32 mppa by the mid 2040s. As the Applicant, we intend to submit to the Planning Inspectorate an application for a Development Consent Order (DCO) to seek the necessary consent to construct, operate and maintain the Proposed Development.

1.1.2 On 1 December 2021, the local planning authority (Luton Borough Council) resolved to grant permission for the current airport operator (LLAOL) to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa. Since then, the Secretary of State for Levelling up, Housing and Communities has issued a “holding direction” which prevents Luton Borough Council from issuing a final decision while the Secretary of State considers whether he should call-in and decide the 19 mppa planning application. All of the assessment work to date has been undertaken using a ‘baseline’ of 18 mppa. Nonetheless, in anticipation of LLAOL’s 19 mppa planning application, the preliminary environmental assessments included sensitivity analysis of the implications of the permitted cap increasing. As a result, the consultation assessments are considered to be sufficiently representative of the likely significant effects of expansion, whether the baseline is 18 mppa or 19 mppa. Where the change of the baseline does affect an assessment topic, in most cases it means that the ‘core’ assessments (using an 18 mppa baseline) report a marginally greater change than would be the case with a 19 mppa baseline. Further consideration will be given to updating the assessments after the consultation, alongside any other revisions made as a result of consultation feedback.

1.2 Project background

1.2.1 In December 2017, we published our ‘Vision for Sustainable Growth 2020-2050’ⁱ. The Vision outlines our intention:

“to make best use of the existing runway at LTN to provide the maximum benefit to the local and sub-regional economy; to deliver good levels of service; and to actively manage environmental impacts at the local and wider levels in line with our wider commitment to responsible and sustainable development.”

1.2.2 In early 2020, the airport was the fifth largest airport in the UK, providing for almost 18 mppa prior to the Covid-19 pandemic. In 2017, it sustained around 27,000 jobs across the UK, strongly supporting the sub-regional economy, and contributed approximately £1.8 billion to the UK economy. In 2018/19, the airport contributed more than £8 million in community investment funding. Passenger growth trends to 2019 showed the airport to be one of the fastest growing airports in the UK.

- 1.2.3 The impacts of the Covid-19 pandemic, and reduction in international aviation have been felt by all UK airports. These unforeseen circumstances led us to re-evaluate the trajectory of future growth at the airport and review the Proposed Development. Despite the pandemic, we have identified a continued opportunity to further expand the offering at the airport to continue meeting the long-term demand for air travel in the South East of England, in turn helping the Government to meet its ambitions to increase freight and passenger movement capacity.
- 1.2.4 We held a Statutory Consultation between October and December 2019 where views on the Proposed Development were sought. We have carefully considered the comments received and these have informed the Proposed Development.
- 1.2.5 We have taken into account the following considerations in developing our proposal:
- a. responses to the 2019 Statutory Consultation;
 - b. ambition to put sustainability at the heart of proposals as part of the ambition to become the UK's most sustainable and socially conscious airport owner;
 - c. the Covid-19 pandemic;
 - d. the UK's withdrawal from the European Union and the potential long term implications on economic growth and passenger demand; and
 - e. continued commitment to the UK Government's 'Aviation strategy: making best use of existing runways'ⁱⁱ policy and relevant aviation and planning policy.
- 1.2.6 The key changes to the Proposed Development since the 2019 Statutory Consultation are:
- a. the Airport Access Road, formerly known as CPAR, is now included as part of the DCO;
 - b. new sustainability design measures including designing Terminal 2 to BREEAM Excellent and Passivhaus principles, solar and geothermal energy, and rainwater harvesting;
 - c. changing the layout of Wigmore Valley Park to preserve more trees, biodiversity, and heritage assets;
 - d. reduction in total car park footprint;
 - e. reduction in the size of the airfield platform and associated earthworks and landside remediation works, along with an updated **Remediation Strategy** in **Appendix 17.5** of Volume 3 of the PEIR;
 - f. improvements to the Proposed Development including reconfigured taxiways, realigning the position of the new stands to reduce the number of stands within the landfill boundary, reducing the size of hardstanding associated with the Engine Run-Up Bay (ERUB) and a new access road to the Fire Training Ground;

- g. additional enhancements to Terminal 1 to increase its capacity to 21.5 mppa in Phase 1 as detailed in **Chapter 4: The Proposed Development** of the PEIR;
- h. updated compensation proposals as described in the **Draft Compensation Policies and Measures** document;
- i. updated phasing of development including later construction start and end dates as described in the **Construction Method Statement and Programme Report** in **Appendix 4.1** of Volume 3 of the PEIR; and
- j. more information on our approach to managing the potential effects of future expansion called Green Controlled Growth (GCG), explained further in the **Draft Green Controlled Growth Proposals**.

1.3 Purpose of this document

- 1.3.1 This report describes the 2019 Statutory Consultation process and provides a summary of how comments received have shaped the Proposed Development. The appendices contain more detailed information on the comments received and our response.

1.4 Structure of document

- 1.4.1 The remainder of this Feedback Report is structured as follows:
 - **Section 2** describes the 2019 Statutory Consultation process;
 - **Section 3** reports on the number of responses received;
 - **Section 4** provides an overview of the feedback received and how this has informed the Proposed Development by topic; and
 - **Section 5** describes the next steps.
- 1.4.2 The document includes the following Appendices:
 - **Appendix A** contains tables, by topic and consultee type, of all comments received and our response; and
 - **Appendix B** contains the technical comments on the 2019 Preliminary Environmental Information Report (PEIR) received from the host authorities (as identified in Section 2.4.5) and our response.

2 STATUTORY CONSULTATION PROCESS

2.1 Purpose of the Consultation

2.1.1 The aim of the Statutory Consultation was to gather views from the local community, statutory consultees, the wider public and all those within an interest in the Proposed Development in order to inform the development of proposals.

2.1.2 Views were specifically sought on:

- a. the reasons we think the airport needs to expand;
- b. the proposed layout of the expanded airport;
- c. the proposed new airfield infrastructure;
- d. our proposed new terminal and supporting infrastructure;
- e. our proposals for how people will access the airport by public transport and road;
- f. how we propose to phase construction;
- g. how we proposed to be a good neighbour during the construction process;
- h. proposals for managing and mitigating the effects of the Proposed Development; and
- i. proposals for land acquisition and compensation.

2.2 When did the consultation take place?

2.2.1 The Statutory Consultation took place for a period of just over eight weeks, between 16 October 2019 and 16 December 2019.

2.3 Consultation Mailing Zone

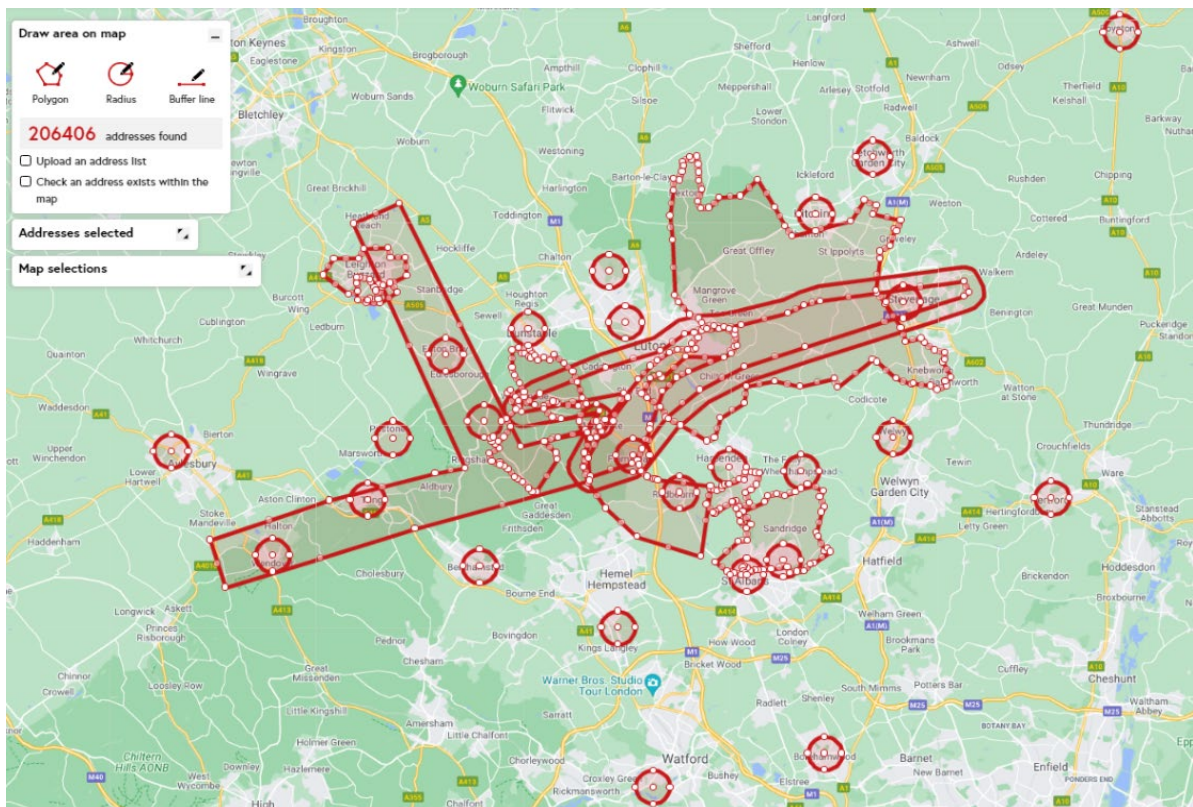
2.3.1 Consultation was not geographically restricted to a specific area, with consultation open to consultees from across the country.

2.3.2 A consultation mailing zone was established in a defined area around the airport, this was based on:

- a. a pre-defined mailing area around the airport with a 1km buffer;
- b. an additional noise route which aligns with the westerly noise preferential route;
- c. an additional area to include specific wards close to the airport;
- d. areas within 1km of a 2019 event location (refer to Section 2.6.8 for more information on consultation events).

2.3.3 The extent of the Statutory Consultation mailing zone is shown on Inset 2.1. All properties within the red areas were sent newsletters notifying them about the consultation.

2.3.4 Inset 2.1: 2019 Consultation Mailing Zone



Source: LBox mailing company

2.3.5 Consultation with the community was also undertaken in places following specific requests from local authorities.

2.4 Who was consulted?

2.4.1 Under the requirements of the Planning Act 2008 (the Act)ⁱⁱⁱ, we were required to consult with particular stakeholders and groups, as outlined in Section 42 and 47 of the Act. Under Section 42 of the Act, we were required to consult the following groups:

- a. Prescribed Consultees 42(1)(a);
- b. Local Authorities 42(1)(b); and
- c. Persons with Interest in the Land 42(1)(d).

2.4.2 Under Section 47 of the Act we were required to consult the local community consultees, including the people living in the vicinity of the Proposed Development and local businesses, community representatives and community groups within the vicinity of the Proposed Development.

2.4.3 In addition to the above, we also recontacted those who provided responses to previous (non-statutory) consultation undertaken in the summer of 2018.

Prescribed Consultees (Section 42)

2.4.4 The relevant prescribed consultees are listed in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended)^{iv}. Tables 2.1 and 2.2 provides a list of the prescribed consultees and relevant statutory undertakers consulted as part of the Statutory Consultation.

Table 2.1 Prescribed Consultation bodies^v

Schedule 1 Description	Organisation
The Health and Safety Executive	Health and Safety Executive
The National Health Service (NHS)	NHS England
The relevant Clinical Commissioning Group	NHS East and North Hertfordshire Clinical Commissioning Group
	NHS Luton Clinical Commissioning Group
	NHS Bedfordshire Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Hertfordshire Fire and Rescue Service
	Bedfordshire and Luton Fire and Rescue Service
The relevant police and crime commissioner	Police and Crime Commissioner for Bedfordshire
	Police and Crime Commissioner for Hertfordshire
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	King's Walden Parish Council
	Offley Parish Council
	St Ippolyts Parish Council
	Hyde Parish Council
	Slip End Parish Council
The Environment Agency	The Environment Agency
The relevant AONB Conservation Boards	Chilterns Conservation Board
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Luton Borough Council
The relevant strategic highways company	Highways England - East

Schedule 1 Description	Organisation
Transport for London	Transport for London
The relevant internal drainage board	Bedford Group of Internal Drainage Boards
Public Health England, an executive agency of the Department of Health	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission - East and East Midlands
The Secretary of State for Defence	Ministry of Defence

Table 2.2 Relevant Statutory Undertakers^{vi}

Statutory Undertaker	Organisation
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant water and sewage undertaker	Affinity Water
	Thames Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
Scotland Gas Networks Plc	
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energetics Electricity Limited

Statutory Undertaker	Organisation
	Energy Assets Networks Limited
	Energy Assets Power Networks Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks Limited

Local Authorities

2.4.5 The Proposed Development is located within the geographical boundaries of four host authorities (as defined under Section 43(1) of the Act) who were all notified of the consultation:

- a. Luton Borough Council (LBC);
- b. Hertfordshire County Council;
- c. North Hertfordshire District Council; and
- d. Central Bedfordshire Council.

2.4.6 In addition, in accordance with Section 43(1) of the Act the following neighbouring local authorities were also notified of the consultation:

- a. Aylesbury Vale District Council;
- b. London Borough of Barnet;
- c. Bedford Borough Council;
- d. Buckinghamshire County Council;
- e. Cambridgeshire County Council;
- f. Dacorum Borough Council;
- g. East Hertfordshire District Council;
- h. London Borough of Enfield;
- i. Essex County Council;
- j. London Borough of Harrow;
- k. London Borough of Hillingdon;

- l. Huntingdonshire District Council;
- m. Milton Keynes Council;
- n. South Cambridgeshire District Council;
- o. St Albans City and District Council;
- p. Stevenage Borough Council;
- q. Uttlesford District Council; and
- r. Welwyn Hatfield Borough Council.

Persons with Interest in the Land

- 2.4.7 Persons with Interest in the Land are defined under Section 42(1)(d) of the Act and include persons who own or have a known interest in land, impacted by the Proposed Development. It also includes persons who may be entitled to make a claim under the Compulsory Purchase Act 1965^{vii} or Land Compensation Act 1973^{viii} because of the Proposed Development proceeding.
- 2.4.8 Persons with Interest in the Land were notified of the consultation by letter.

Section 47 Consultees

- 2.4.9 We were required to consult people living in the vicinity of the Proposed Development. This area is discussed in **Section 2.3**.

2.5 Consultation Methods

- 2.5.1 In accordance with the requirements of the Act, a range of methods and materials were employed to ensure that all consultees could take part.

Consultation Materials

Written Information

- 2.5.2 Information was provided during the consultation electronically via the project's consultation website, and in hard copy at the nominated inspection venues and at consultation events. To ensure accessibility the documents were written in plain English. The Statement of Community Consultation (SoCC) also set out that requests for documents in alternative formats (such as translations, easy read, large print, or braille) would be considered where it was reasonably practical to do so (however, no such requests were received).
- 2.5.3 In accordance with the SoCC, documents were also made available upon request on USB memory stick. These USB memory sticks were also provided to host and neighbouring local authorities.
- 2.5.4 Additionally, those without computer access could request a printed copy of the Guide to Statutory Consultation and Feedback Form free of charge. The full suite of printed consultation documents was made available for purchase (however no such requests were received).
- 2.5.5 The Consultation Brochure included an overview of all the written materials available to help signpost consultees. A complete list of the consultation

documents provided online (and via other means), and a brief explanation of their content is provided in **Table 2.3**. These documents are still available to view on the project website at: www.lutonrising.org.uk/our-airport/future-luton/

Table 2.3: Consultation Documents

Consultation Documents	
Main Statutory Consultation documents	
Information Booklet	The Information Booklet provided a high-level summary of the Proposed Development and the information contained within the Guide to Statutory Consultation (the Guide). The Information Booklet explained our rationale for growth and detailed the proposed expansion and mitigation measures. The Information Booklet also provided details of how the community could engage with the consultation process.
Guide to Statutory Consultation	The Guide provided a detailed explanation of the Proposed Development. The Guide provided a detailed summary of the statutory consultation requirements of the Planning Act 2008 and provided readers with descriptions of the consultation documents.
Feedback Form	The feedback form had 12 questions, with some broken down further into sub-questions. It contained a mixture of open and closed questions relating to the Proposed Development.
Statement of Community Consultation	The SoCC set out the approach to consultation. It included details of where and when consultation events were undertaken and the location and opening times of document inspection venues, where consultation material could be physically reviewed. The SoCC also provided publicity details of the consultation, as well as a high-level summary of proposed engagement with particular communities.
Consultation Boards	Consultation Boards provided consultees with visual and technical information concerning the Proposed Development. The Consultation Boards visually presented information contained in other consultation documents.
Detailed technical documents supporting Statutory Consultation	
Preliminary Environmental Information Report (PEIR) <ul style="list-style-type: none"> • Non-Technical Summary • Volume 1 • Volume 2, Part A • Volume 2, Part B 	The Preliminary Environmental Information Report (PEIR) described the environmental considerations considered relevant to the Proposed Development. It detailed the methodology undertaken in assessing the potential environmental impacts and set out the preliminary findings of the impact assessment for the Proposed Development, including the proposed environmental mitigation

Consultation Documents	
<ul style="list-style-type: none"> • Volume 3, Contents • Volume 3, Appendices 	measures. The PEIR also included a Draft Code of Construction Practice (CoCP).
Outline Need Case	The Outline Need Case described the case for the Proposed Development. It assessed the demand forecasts against current and future required capacity whilst highlighting the economic implications of growth.
Surface Access Strategy Report	The Surface Access Strategy provided a summary of the proposals for surface access both within and separate from the Main Application Site. It included analysis on surface access matters including public transport strategy, transport modelling approach and key findings and proposed mitigation measures.
Scheme Development and Construction Report	The Scheme Development and Construction Report documented the key features of the Proposed Development. It explained the parameters of the individual elements that we are seeking consent for, documenting development considerations and provided details on proposed delivery.
Explanatory Note on Airspace	The Explanatory Note on Airspace provided more information on the process of airspace change, which is subject to an ongoing process as part of a wider Government initiative, separate from Proposed Development. As it was recognised that this process is of interest to many consultees, this document sought to provide the necessary background information on the airspace change that is taking place. In addition to explaining the broader context of the airspace change, this Note explained what this could mean for the airport and the interaction with the DCO process.
Compensation Proposals	The Compensation Proposals explained the legal compensation framework requirements and provided a summary of the proposed compensation scheme. The Compensation Proposals also outlined the further funding aimed at specifically tackling adverse effects of the Proposed Development, not addressed by mitigation already included elsewhere.
Draft Land Assembly Plans	The Draft Land Assembly Plans spatially displayed the land required for the Proposed Development, including offsite developments.
Outline Employment and Training Strategy	The Outline Employment and Training Strategy explained how the economic and employment benefits associated with the Proposed Development would be maximised for Luton and the three counties of Hertfordshire, Bedfordshire, and Buckinghamshire.

- 2.5.6 In addition to the documents listed in **Table 2.3**, previously published documents from earlier consultation remained accessible on the Proposed Development website, including the 2018 non-statutory consultation document and associated feedback report.

Feedback Form

- 2.5.7 A feedback form was provided for anyone wishing to respond to the consultation. It could be completed online via the website or in hard copy. Consultees were also able to complete and submit hard copy forms at the consultation events or via the FREEPOST address.
- 2.5.8 Consultees were required to state whether they were an individual or responding on behalf of an organisation and to confirm their status as an employee, commercial or business partner or travelling customer (of varying frequencies), where relevant. The feedback form also asked consultees to state what negative impacts from the airport they had been subject to before seeking open comments on the Proposed Development.

2.6 Engagement Methods

- 2.6.1 To ensure the Statutory Consultation was inclusive and accessible to all, several communication channels were used as set out below.

Website

- 2.6.2 A dedicated website was available from the start of the consultation period: www.futureluton.llal.org.uk. This remained live for the duration of the consultation period. It contained the written information described above, details of the public exhibition events, contact information and details of how to respond to the consultation.
- 2.6.3 The website was promoted through the notification methods, such as letters, leaflets and advertisements, discussed further in **Section 2.8** of this document.
- 2.6.4 The website has since been updated and is available here: www.lutonrising.org.uk. It continues to provide the community a library of information concerning the Proposed Development. The website provides community updates as relevant and has been updated for the 2022 consultation with a new and updated suite of technical and consultation documents.

Phoneline

- 2.6.5 At the start of the consultation we launched a helpline (01582 548782) which was available Monday to Friday 9am – 5pm. The phoneline was available for consultees to ask questions relating to the Proposed Development and ask for hard copies of consultation materials.
- 2.6.6 Formal consultation feedback was received by exception via the phoneline. A total of three consultation responses were recorded in this manner.

Project email address

- 2.6.7 A project specific email address (futureluton@llal.org.uk) was available throughout the consultation period. It was available for consultees to request further information, submit consultation responses or ask questions. Consultation responses received via email have been considered in the same way as those received through other channels.

Consultation Events

- 2.6.8 35 consultation events were hosted at locations in the community. These open exhibitions allowed members of the public to view the proposals, talk to members of the project team and complete feedback forms. Feedback forms could either be completed at the event or taken away, completed, and returned via FREEPOST later.
- 2.6.9 The event venues were primarily chosen on the basis of their suitability as a community facility, their proximity to potentially affected communities, provision of disabled access and their availability.
- 2.6.10 Details of the public exhibitions were provided on the project website, by direct communications, locally displayed posters, press and radio advertising and social media. In total 3,894 people attended the exhibitions. **Table 2.4** below provides details of venue locations, dates, and times.
- 2.6.11 One of the events, that was held in Leighton Buzzard on 22 November 2019, was not included at the start of consultation but was added in response to requests from the community. It was attended by 138 people.

Table 2.4: Consultation Events

Date 2019	Town/village	Venue address	Time	Number of Attendees
Friday 25 October	Luton	Maidenhall Primary School, Newark Road, LU4 8LD	4pm – 8pm	28
Saturday 26 October	Luton	Wigmore Church & Community Centre, Crawley Green Road, LU2 9TE	11am – 5pm	320
Tuesday 29 October	Dagnall, Bucks	Dagnall Village Hall, Dunstable Road, HP4 1RG	4pm – 8pm	83
Wednesday 30 October	Marshalswick, St Albans	Marshalswick Community Centre, The Ridgeway, AL4 9TU	2pm – 8pm	283
Thursday 31 October	Caddington, Beds	Caddington Sports and Social Club,	2pm – 8pm	182

Date 2019	Town/village	Venue address	Time	Number of Attendees
		Manor Road, LU1 4HH		
Friday 1 November	Pitstone, Bucks	Pitstone Memorial Hall, Vicarage Road, Pitstone, LU7 9EY	2pm – 8pm	79
Saturday 2 November	Wendover, Bucks	Wendover Memorial Hall, Wharf Road, HP22 6HF	11am – 3pm	53
Monday 4 November	Hertford	The Mill Bridge Rooms, The Seed Warehouse, The Wash, SG14 1PX	4pm – 7pm	59
Tuesday 5 November	Hitchin	Hitchin Town Hall, Brand Street, SG5 1HX	2pm – 8pm	344
Wednesday 6 November	Whitwell, Herts	Whitwell New Fellowship Hall, 9 Bendish Lane, SG4 8HX	2pm – 8pm	134
Thursday 7 November	Wheathampstead, Herts	The Memorial Hall, Marford Road, Wheathampstead, AL4 8AY	2pm – 8pm	140
Friday 8 November	Berkhamsted	Civic Centre, 161 High Street, Berkhamsted, HP4 3HB	3pm – 7pm	121
Monday 11 November	Flamstead, Herts	Flamstead Village Hall, Church Road, Flamstead, AL3 8BN	4.30pm – 8pm	71
Tuesday 12 November	Harpenden	Southdown Room, Harpenden Public Halls, Southdown Road, AL5 1TE	2pm – 8pm	285
Wednesday 13 November	Welwyn	Civic Centre, Prospect Place, Welwyn, AL6 9ER	4pm – 8pm	84
Thursday 14 November	Aylesbury	The Gateway, Gatehouse Road, Aylesbury, HP19 8FF	4pm – 8pm	19

Date 2019	Town/village	Venue address	Time	Number of Attendees
Friday 15 November	Luton	St Francis Church, Carteret Road, Luton, LU2 9JZ	4pm – 8pm	136
Saturday 16 November	Borehamwood	Fairway Hall, Brook Close, Borehamwood, WD6 5BT	11am – 3pm	31
Monday 18 November	Markyate, Herts	Markyate Village Hall, 39 Cavendish Road, Markyate, AL3 8PS	2pm – 8pm	131
Tuesday 19 November	Luton	Stockwood Discovery Centre, London Road, Luton, LU1 4LX	2pm – 8pm	192
Thursday 21 November	Nash Mills, Herts	Nash Mills Village Hall, Lower Road, Nash Mills, HP3 8RT	4pm – 8pm	18
Friday 22 November	Leighton Buzzard	Leighton Town FC, Bell Close, Lake Street, LU7 1RX	4pm – 8pm	138
Saturday 23 November	Watford	Holywell Community Centre, Chaffinch Lane, Watford, WD18 9QD	11am – 3pm	57
Monday 25 November	Breachwood Green, Herts	Breachwood Green Village Hall, Chapel Road, Breachwood Green, Hitchin, SG4 8NX	2pm – 8pm	207
Tuesday 26 November	Letchworth	The Broadway Hotel, Broadway, Letchworth, SG6 3NZ	4pm – 8pm	101
Wednesday 27 November	Redbourn	Redbourn Village Hall, 63 High Street, Redbourn, AL3 7LW	2pm – 8pm	140
Thursday 28 November	Luton	Ramridge Primary School, Turners Road North, Luton, LU2 9AH	4pm – 8pm	55

Date 2019	Town/village	Venue address	Time	Number of Attendees
Friday 29 November	St Albans	Jubilee Centre, Catherine Street, St Albans, AL3 5BU	2pm – 8pm	143
Saturday 30 November	Royston, Herts	Market Hill Rooms, Fish Hill, Royston, SG8 9JL	11am – 3pm	58
Mon 2 December	Luton	Marsh Farm Futures, The Moakes, Luton, LU3 3QB	4pm – 8pm	45
Tuesday 3 December	Dunstable	Dunstable Conference Centre, 51 High Street North, LU6 1JF	4pm – 8pm	29
Wednesday 4 December	Tring	Nora Grace Hall, Faversham Close, Tring, HP23 5BA	2pm – 8pm	116
Thursday 5 December	Stevenage	Arts and Leisure Centre, Lytton Way, Stevenage, SG1 1LZ	4pm – 8pm	117
Friday 6 December	Eaton Bray, Beds	Eaton Bray Village Hall, Church Lane, Eaton Bray, LU6 2DJ	4pm – 8pm	48
Saturday 7 December	Slip End, Beds	Slip End Village Hall, The Cross Roads, Markyate Road, LU1 4BJ	11am – 3pm	105

2.6.12 Exhibition boards explaining the Proposed Development project were displayed at all venues. The boards are still available to view on the project website at: www.lutonrising.org.uk/our-airport/future-luton/.

2.7 Document Inspection Venues

2.7.1 Copies of all consultation materials including feedback forms were made available to view free of charge from the start of consultation at 32 designated inspection venues. An additional venue (Leighton Buzzard Library) was added during the consultation period. The list of document inspection venues during the consultation period is provided in **Table 2.5**.

Table 2.5: Document Inspection Venues

Document inspection venues	
Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF	Luton Central Library, St George's Square, Luton, LU1 2NG
Baldock Library, Simpson Drive, Baldock, SG7 6DH	Luton Borough Council, Town Hall, George Street, Luton, LU1 2BQ
Beacon Villages Community Library, Old Town Hall, High Street, Ivinghoe, LU7 9EP	Marsh Farm Library, Lea Manor High School, Northwell Drive, Luton, LU3 3TL
Bury Park Library, Bury Park Community Centre, 161 Dunstable Road, Luton, LU1 1BW	Milton Keynes Central Library, 555 Silbury Boulevard, Central Milton Keynes, MK9 3HL
Cambridge City Council, Mandela House, 4 Regent Street, Cambridge, CB2 1BY	Milton Keynes Council, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3EJ
Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford, SG17 5TQ	North Hertfordshire District Council, Council Offices, Gernon Road, Letchworth Garden City, SG6 3JF
Central Bedfordshire Council, Watling House, High Street North, Dunstable, LU6 1LF	South Cambridgeshire Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA
Dunstable Library, The Dunstable Centre, Court Drive, Dunstable, LU5 4JD	St Albans Council, Civic Centre, St Peter's St, St Albans, AL1 3JE
Harpenden Library, 27 High Street, Harpenden, AL5 2RU	St Albans Library, The Maltings, St Albans, AL1 3JQ
Hemel Hempstead Library, The Forum, Marlowes, Hemel Hempstead, HP1 1DN	Stevenage Borough Council, Daneshill House, Danestrete, Stevenage, SG1 1HN
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DQ	Stevenage Central Library, Southgate, Stevenage, SG1 1HD
Hitchin Library, Paynes Park, Hitchin SG5 1EW	Stopsley Library, 598 Hitchin Road, Luton, LU2 7UN
Huntingdonshire District Council, Pathfinder House, St Mary's Street, Huntingdon PE29 3TN	Tring Library, High Street, Tring, HP23 4AF
Leagrave Library, Marsh Road, Luton, LU3 2NL	Welwyn Library, Civic Centre, Prospect Place, Welwyn, AL6 9ER
Leighton Buzzard Library, Ground Floor Library Building, Lake Street, Leighton Buzzard, LU7 1RX	Wendover Community Library, High Street, Wendover, HP22 6DU

Document inspection venues	
Letchworth Library, Broadway, Letchworth Garden City, SG6 3PF	Lewsey Library, Landrace Road, Luton, LU4 0SW

2.8 Notification

Letters and Leaflets

2.8.1 As discussed in **Section 2.4**, Prescribed Consultees as defined under Section 42 of the Act, received consultation letters at the start of the consultation period, formally notifying them of the Proposed Development and how they could engage with the consultation process.

Newsletters

2.8.2 At the commencement of the consultation period, we sent a newsletter detailing the Proposed Development, consultation events and how stakeholders could engage with the proposals. This newsletter advertised the consultation process to households living underneath the airport's flight paths as well as people living within 1km of community consultation event venues, as discussed in **Section 2.3**. The newsletter was sent to 189,475 addresses on 14 October 2019. An additional newsletter was sent to 17,690 addresses on 14 November 2019 providing information on the additional Leighton Buzzard event.

2.8.3 In addition to these areas, newsletters were also sent to the following:

- a. local libraries;
- b. community centres;
- c. places of worship;
- d. venues where events would be held;
- e. parish councils; and
- f. contacts identified that work with or can reach out to hard-to-reach groups.

Newspapers

2.8.4 To comply with the requirements of Section 47 and Section 48 of the Act, statutory notifications were placed in newspapers at the start of the consultation period. These notices provided details of the consultation, including the document inspection venues and the duration of the consultation period. **Table 2.6** provides a list of the newspapers which featured published notices of consultation and the date of publication.

Table 2.6: Newspapers with published notices of consultation

Newspaper	Date of notification publication
The Times	8 October 2019
The London Gazette	8 October 2019
Barnet Borough Times	17 October 2019 and 24 October 2019
Biggleswade Chronicle	11 October 2019 and 18 October 2019
Bucks Free Press	11 October 2019 and 18 October 2019
Bucks Herald	9 October 2019 and 16 October 2019
Cambridge News	8 October 2019 and 15 October 2019
Dunstable Gazette	9 October 2019 and 16 October 2019
Harrow Times	10 October 2019 and 17 October 2019
Hemel Hempstead Gazette	9 October 2019 and 16 October 2019
Hertfordshire Mercury	10 October 2019 and 17 October 2019
Herts Advertiser	10 October 2019 and 17 October 2019
Hitchin Comet	10 October 2019 and 17 October 2019
Hunts Post	9 October 2019 and 16 October 2019
Leighton Buzzard Observer	8 October 2019 and 15 October 2019
Letchworth & Baldock Comet	10 October 2019 and 17 October 2019
Luton & Dunstable Herald & Post	10 October 2019 and 17 October 2019
Luton News	9 October 2019 and 16 October 2019
Milton Keynes Citizen	10 October 2019 and 17 October 2019
Royston Crow	10 October 2019 and 17 October 2019
Stevenage Comet	10 October 2019 and 17 October 2019
Watford Observer	11 October 2019 and 18 October 2019
Welwyn & Hatfield Times	9 October 2019 and 16 October 2019

Email

- 2.8.5 Stakeholders, including businesses, interest groups and individuals who took part in the previous non-statutory consultation in 2018 were sent an email notification at the commencement of the consultation period. Emails provided consultees with details of the consultation process, including document inspection venues, event times and the duration of the consultation period.

Advertising and Publicity

Print advertisements

- 2.8.6 In accordance with the requirements of Section 47 and Section 48 of the Act, advertisements were placed in local and national printed and digital newspapers (as set out above).

2.8.7 In addition, posters were distributed within venues across Luton and the surrounding local authority areas. These described the Proposed Development, consultation events and how stakeholders could engage with the proposals. Venues where these posters were circulated for display included:

- a. local libraries;
- b. community centres;
- c. colleges;
- d. places of worship;
- e. venues where our events will be held;
- f. the airport;
- g. parish councils (as identified within the host authorities identified at section 2.4.5); and
- h. local/district/county councils.

Radio Advertisements

2.8.8 Radio adverts were played on Heart FM on throughout the consultation period. Adverts were also played on local community radio stations.

Press Releases

2.8.9 Press releases were shared with journalists to facilitate coverage in national and local print, radio, and television media. This was in addition to the information provided in national and local newspapers (as detailed in **Table 2.6**) and the information shared with local authorities and parish councils for inclusion in their own print newsletters (as discussed further in **Section 2.9**).

Social Media

2.8.10 The consultation was promoted using various social media channels, including our Twitter (@LLA_Ltd and @LutonCouncil) and Facebook (pages: LondonLutonAirportLtd and LutonCouncil) accounts. Posts included details of the Proposed Development and encouraged users to visit the project website and provide feedback.

2.8.11 We also encouraged, through close communication, the local authorities to use their own social media channels to promote the consultation and website.

2.8.12 We employed the use of geographically targeted advertising on social media (including Twitter and Facebook), to encourage the local community and stakeholders to visit the project website and provide feedback.

Postcards

2.8.13 Additionally, postcards containing a short overview of the Proposed Development were distributed to places of worship, council buildings, community centres and children's centres.

2.9 Local Authority Briefings

- 2.9.1 We offered and provided briefings to the host and neighbouring local authorities (and parish councils within the local authorities). We held an event for parish councils and provided briefings for six local authorities, as well as nearby parish councils. Throughout the consultation period we worked with the local authorities to ensure that they had the correct information about the Proposed Development and consultation process to help them advertise and promote the consultation effectively.
- 2.9.2 We provided information to parish councils and local authorities for possible inclusion in their local newsletters. Additionally, where parish councils allowed advertisements in their newsletters, we submitted advertisements to promote the consultation events, and sought to direct stakeholders to our website. Packs of posters were provided to each parish council to put on their local noticeboards.

2.10 Businesses

- 2.10.1 We encouraged business groups, such as the Chamber of Commerce, airlines and the South East Midlands and Hertfordshire Local Enterprise Partnerships to engage with the proposals and share details of the consultation with their business community contacts and employees.
- 2.10.2 We also worked closely with the airport's operator, LLAOL, to encourage them to participate in the consultation process and ensure they shared the details with other businesses, as well as their employees.

2.11 Hard to Reach Groups

- 2.11.1 Hard to reach groups, including young people, working families, people with disabilities as well as minority groups were contacted through specific means, following advice received from host local authorities. This included measures such as the distribution of poster packs to schools to facilitate advertising the consultation to students and pupils and the hosting of consultation events on weekdays and weekends, allowing working families the opportunity to participate in the consultation.
- 2.11.2 The selection of consultation events, based on their level of access and location, was also informed by the needs of particular hard-to-reach groups, including people with disabilities and minority groups.

3 FEEDBACK RECEIVED

3.1.1 In total we received 3,501 formal responses during the Statutory Consultation period. **Table 3.1** provides further information on the format of these responses received.

Table 3.1: Consultation response format

How response was received	Number
Online feedback form	1,363
Hard copy feedback form	479
Freeform response received via email	790
Freeform response received in hard copy	83
Postcards	781
Telephone	3
Petitions	2

3.1.2 Of the two petitions received, one objected to the proposals and contained 578 signatures, the other was supportive of the proposals and contained 1,943 signatures. The supportive and opposing comments raised in petitions have been treated in the same manner as comments received via other mediums.

3.1.3 Responses were received from local authorities, prescribed consultees, national, regional, and local organisations, businesses, and the local community.

3.1.4 The following organisations categorised as Prescribed Consultees under Section 42 of the Act responded to the consultation:

- a. Affinity Water;
- b. Bedfordshire Police and Crime Commissioner;
- c. Cadent Gas;
- d. Chiltern Conservation Board;
- e. Civil Aviation Authority;
- f. England's Economic Heartland;
- g. Environment Agency;
- h. Health and Safety Executive;
- i. Hertfordshire Fire and Rescue;
- j. Highways England;
- k. Historic England;
- l. Kings Walden Parish Council;
- m. NATS En Route Safeguarding;
- n. Natural England;

- o. Network Rail;
- p. Public Health England;
- q. Slip End Parish Council; and
- r. Thames Water.

3.1.5 The following organisations categorised as Local Authorities under Section 43 of the Act responded to the consultation:

- a. Buckinghamshire County Council and Aylesbury Vale District Council (combined response);
- b. Central Bedfordshire Council;
- c. Chiltern District Council¹;
- d. Dacorum Borough Council;
- e. Essex County Council;
- f. Greater Cambridge Planning;
- g. Harrow London Borough Council;
- h. Hertfordshire County Council;
- i. Host authorities (combined response from LBC, Hertfordshire County Council, North Hertfordshire District Council and Central Bedfordshire Council);
- j. Milton Keynes Council;
- k. North Hertfordshire District Council;
- l. St Albans City and District Council; and
- m. Stevenage Borough Council.

¹ On 1 April 2020 Chiltern District Council was replaced by a new unitary authority, Buckinghamshire Council. The response to the 2019 consultation was submitted prior to this change.

4 OVERVIEW OF FEEDBACK

4.1 Summary of key changes made in response to feedback

4.1.1 We have carefully considered all of the comments received during the 2019 consultation and updated our Proposed Development to take as many on board where practicable or possible to do so. The key changes we have made are described below and the following sections provide more detail on the comments received and our response topic by topic.

Managing the impact on local communities

4.1.2 You told us you are concerned about the impact expansion could have on local communities including more noise and traffic and poorer air quality. You gave us the clear message that you want us to be more ambitious in our approach to reducing this. In response we have developed a new approach to managing the potential effects of the Proposed Development called 'Green Controlled Growth' (GCG). This is one of the most far-reaching commitments to minimising environmental impact ever put forward by a UK airport, and seeks to manage the growth and operation of the airport through the coming decades within definitive environmental limits.

Sustainability

4.1.3 You told us that you wanted us to go further in making our design sustainable. In response we've incorporated lots of sustainability measures into the new terminal. These include renewable energy such as solar and geothermal, as well as rainwater harvesting. We've also committed to designing the terminal to BREEAM Excellent principles in terms of its environmental performance.

4.1.4 We have also thought about how we can make the existing terminal more sustainable and propose the introduction of solar panels to generate electricity, electrical charging for aircraft whilst parked, as well as adding new water storage which will allow collected water to be recycled.

4.1.5 We have also added additional solar energy production on the car park, including battery storage and distribution.

Accessing the airport

4.1.6 Since we consulted in 2019, we have also included the new Airport Access Road (formerly called Century Park Access Road) and improvements to the Airport Way/Percival Way junction in our Proposed Development. We've also reconsidered our plans for car parking so that the right amount of car parking spaces are available at each phase of development.

Wigmore Valley Park

4.1.7 We know from the 2019 consultation that Wigmore Valley Park is an important local open space which people want to see protected and improved. We have updated our design to keep more trees and maintain biodiversity and retain an existing ridgeline which will provide visual screening. Our new design also protects the British Romano structure in the park.

Construction

- 4.1.8 Many respondents were concerned about the potential disruption which could be caused during construction. We have amended our design to reduce the size of the airfield platform and landside remediation works, which will significantly reduce the amount of earth which needs to be moved and materials which need to be brought onto the site. This will reduce the construction works on site and mean there are less construction vehicles on the surrounding roads.
- 4.1.9 We have also changed the phasing of the Proposed Development which means construction will have the same duration but will now start later and finish later.

Other changes to the design

- 4.1.10 We have made other changes to our design in response to comments, including reconfigured taxiways, realigning the position of the new stands to reduce the number within the landfill boundary, reducing the size of hardstanding associated with the ERUB, moving the fuel storage facility further away from the runway and a new access road to the Fire Training Ground.
- 4.1.11 A summary of the main issues raised is set out below, the number in () brackets relate to the number of community consultees who raised it. The tables include a summary of some of the main issues raised and our response to them.

4.2 Need Case and Forecasts

- 4.2.1 The need case and forecasts which underpins the Proposed Development is an issue which the local community feel strongly about. It received more comments than any other topic, with 2,394 community respondents covering it in their response. Eight statutory consultees and 11 local authorities also provided comments.
- 4.2.2 Opposition to the Proposed Development was the most common response received (1,456), with the second most common response, albeit with significantly less responses, being general support for the Proposed Development (590).
- 4.2.3 Several community respondents deemed the Proposed Development to generally be unnecessary (376).
- 4.2.4 Some community respondents questioned the justification for the Proposed Development, for example suggesting that it was being undertaken at the expense of the environment or local communities (319).
- 4.2.5 A number of community respondents were concerned about the demand forecasts underpinning the Proposed Development, stating these figures were either inaccurate or overly optimistic (222). Similarly, some community respondents were concerned the need case was using outdated data, namely the Department for Transport (DfT) 'UK Aviation Forecasts 2017'^{ix} (47).
- 4.2.6 There was concern from some community respondents that the Proposed Development had not been considered in the context of the forecast demand

being met by other airports, which are either in the process of expanding or have recently expanded (232).

- 4.2.7 A number of community respondents were also concerned about the effects of Brexit on the need case and forecasts, stating uncertainty around Brexit had not been considered (142). The nature of airlines using the airport was also raised with some community respondents stating the Proposed Development was underpinned by the continued operation of low cost carriers, who were more vulnerable to collapse (67), some considered Brexit would heighten this.
- 4.2.8 Community respondents also had a number of suggestions concerning the need case and forecasts, with some of the most common responses suggesting a reduction in the number of flights (127), that the current airport was large enough (105) or that steps should be taken to limit passenger growth (59). Correspondingly, some community respondents suggested the passenger growth forecasts and associated profits of the Proposed Development should be revised and reduced, to take various factors into account, not least the effects of Brexit and climate change (56).
- 4.2.9 Community respondents also suggested alternative ways of meeting demand, including locating the airport elsewhere (59) and encouraging other forms of transport over air travel (52). Some community respondents suggested the Proposed Development is delayed (32), expanded at a slower rate (7) or better managed and reconfigured as an alternative to the Proposed Development (46).
- 4.2.10 Statutory consultees and local authorities raised many of the same issues as community consultees, some supporting the Proposed Development and ongoing operations, while others were concerned about the staging of delivery, growth and validity of the demand forecasts figures.
- 4.2.11 Table 4.1 details the key need case issues raised. Detailed responses to all comments can be found in **Appendix A**.

Table 4.1: Need case key issues

Key issue	Response
<p>Oppose expansion.</p> <p>Consider the Proposed Development unnecessary.</p>	<p>The airport is central to the local economy and is an important connectivity asset for the broader region it serves including the Oxford-Cambridge Arc. It also supports regeneration and levelling up in Luton and neighbouring areas, where levels of deprivation are below average. In order to maintain its connectivity and significance across the economic region, the airport must address its capacity constraints.</p> <p>Without additional capacity, the airport will not be able to accommodate any further growth in demand in the future and this would limit its ability to support wider economic growth across the sub-region.</p> <p>With expansion to 32 mppa, the airport's economic impact will increase considerably. The number of</p>

Key issue	Response
	<p>direct airport-related jobs is expected to increase by 4,500 by the time the airport is handling 32 mppa compared to 2019.</p> <p>Luton is the UK's only major airport wholly owned by the local council, and we are committed to reinvesting the benefits of growth back to the community. Alongside its contribution to employment, London Luton Airport contributes more per passenger than any other airport back into community services. There are both significant dividends that are returned to LBC, our shareholder, along with numerous grants to Community Funding Programmes.</p> <p>The Proposed Development is being brought forward in the context of Government policy that supports airports making best use of their runways, as set out in 'The future of UK aviation: making best use of existing runways'^x.</p> <p>Further information is set out in the Consultation Brochure and Draft Need Case.</p>
Support expansion.	Support for the Proposed Development is welcomed.
Concern the need case and forecasts for the Proposed Development are underpinned by continued operation of low cost carriers and holiday companies.	<p>The low cost airlines using the airport are considered to be financially stable. In any event, where airlines cease operating or move to alternative airports, other airlines tend to fill the gap where there is clear market demand, as is the case for the Proposed Development. Low cost carriers serve business oriented cities and provide vital connections for those visiting friends and relatives and not just holiday flights.</p> <p>Furthermore, growth in capacity at the airport is expected to widen the base of airlines.</p>
Suggest there should be a reduction in the number of flights. Some respondents suggested this was required to meet climate change, noise, and air quality targets.	<p>The proposed increase in the number of flights is in line with Government policy^{xi} that airports should make best use of their existing runways.</p> <p>Demand for air transport has grown rapidly in the UK, more than doubling since 1997 and reaching 292 million passengers using UK airports in 2018. The DfT publishes forecasts of aviation demand, with the latest being UK Aviation Forecasts 2017^{xii}. These forecasts show air passenger demand to use the UK's airports rising to between 335 and 380 million passengers by 2030 and between 470 and 535 million passengers by 2050. Based on the DfT</p>

Key issue	Response
	<p>forecasts, all London airports are expected to reach their consented planning limits over the period to 2040.</p> <p>Before the Covid-19 pandemic the airport was at capacity and is expected to be so again in the near future, it has been important to prepare specific forecasts of future passenger demand to inform our thinking about the scale and timing of the capacity enhancement required to support making the best use of our runway. The Covid-19 pandemic led to an almost complete suspension of flying from many UK airports and a significant drop in demand. Therefore, updated forecasts have been developed using the latest economic projections, and these take into account the effects of Covid-19, Brexit and the costs associated with off-setting, removal or abatement of carbon. The forecasts are also set out as a range to reflect greater market uncertainty over the forecast period. These can be found in the Draft Need Case.</p> <p>Additionally, we are proposing a “Green Controlled Growth” (GCG) framework which will ensure that the airport operates within particular “limits”. Limits will be set in respect of air quality, noise, surface access and carbon emissions. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals – however one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.</p>
<p>Concern the need case does not consider the possibility of forecast demand being met by other airports in England.</p>	<p>The demand forecasts reported in the Draft Need Case are generated by allocating demand across all the London airports and take into account the projected capacity of each and the ability for them to attract a share of the growth expected across the Greater South East. Even with this allocation of demand to other airports, the forecasts still indicate strong growth potential at the airport.</p> <p>The original demand forecasts did not include the potential for Gatwick Airport to use its standby runway as a permanent second runway, because</p>

Key issue	Response
	<p>the proposal was unclear at the time the forecasts were prepared. This possibility has now been taken into account in the updated forecasts included in the Draft Need Case, which also reflects the delays to the delivery of additional runway capacity at Heathrow.</p> <p>The Proposed Development is driven by the underlying growth in the air travel market in the Greater South East of England, rather than seeking to draw more regional passengers to use the airport. The demand forecasts took as their start point an assumption that airports outside the South East of England would be able to expand to accommodate growth in their own local market. The faster growth expected at the airport is a reflection of faster economic growth driving the need for more airport capacity. Expansion of airport capacity in the north would not be an alternative as suggested by some respondents, nor is the Proposed Development seeking to expand at the expense of airports elsewhere.</p>
Concern the demand forecasts data is inaccurate or overoptimistic.	Details of how the demand forecasts have been produced are included in the Draft Need Case .
Concern the need case and forecasts did not consider the uncertainty associated with Brexit.	The demand forecasts take account of Brexit, using updated Gross Domestic Product projections from the Office of Budget Responsibility and other official bodies, which reflect the Government's projected impact of Brexit on the UK economy.
Suggest the Proposed Development facilitate expansion of the route network including services to long haul destinations.	Long haul flights are included within the forecasts, as detailed in our Draft Need Case . These will be enabled by improvements in runway performance for new generation widebody aircraft as well as the provision of terminal, apron and taxiway infrastructure to accommodate these activities.

4.3 Climate change and carbon

- 4.3.1 Climate change and carbon was a topic that respondents felt strongly about, with 1,810 community respondents making comments, as well as five statutory consultees and 11 local authorities.
- 4.3.2 The most common concern raised by community respondents was a general concern about the overall impact of the Proposed Development on the environment and the acceleration of climate change, with respondents

expressing concern about all aspects including increased flights, construction, and the associated increase in vehicle movements (820). In turn, concerns were raised regarding the compatibility of the Proposed Development with relevant Government targets and legislation, including the Climate Change Act 2008 and net zero carbon emission targets (378). A number of other respondents also expressed concern that the Proposed Development would hinder achieving global carbon reduction targets (191) and LBC targets (39).

- 4.3.3 A significant number of community respondents considered that an increase in climate change awareness will reduce demand for air travel, thus making the Proposed Development redundant (398). Other community respondents questioned the sustainability of the aviation industry itself, indicating that current technology does not warrant airport expansion (198). Respondents were also specifically concerned about the increase in greenhouse gas (GHG) emissions expected from the operation of the Proposed Development (373) as well as those associated with construction works (40).
- 4.3.4 In response to the proposals to minimise the environmental impact of the Proposed Development, some respondents considered them inadequate and/or unrealistic, and felt that we were ‘greenwashing’ the application for development consent (303). Others were concerned that the proposals were ineffective or insufficient to tackle the expected increase in GHG emissions and that we should go further in incorporating measures to reduce impacts (218).
- 4.3.5 A large number of suggestions made sought a general reduction in air travel and flights (391), greater priority towards addressing climate change (120) or a reduction in carbon emissions (27). Some respondents suggested increasing the cost of flying to reduce demand (66), investing in greener technologies (69) or implementing legislation to reduce carbon emissions (48).
- 4.3.6 Statutory consultees and local authorities also raised issues relating to climate change and the environment, with many supporting a sustainably led Proposed Development that adheres to relevant policy and minimises potential negative impacts as far as possible.
- 4.3.7 Table 4.2 details the key climate change and carbon issues raised. Detailed responses to all comments can be found in **Appendix A**.

Table 4.2: Climate change and carbon key issues

Key issue	Response
Concern the Proposed Development will contribute to the climate change crisis.	A preliminary assessment of the GHG emissions associated with the Proposed Development is included in Chapter 12 Greenhouse Gases of the PEIR. This outlines a comprehensive suite of mitigation measures to ensure that emissions are minimised and demonstrates that the Proposed Development will not materially impact the ability of the Government to meet its carbon reduction targets by 2050, including carbon budgets.

Key issue	Response
	<p>As the owner of the airport, we are committed to reducing GHG emissions as far as practicable. An extensive list of mitigation measures will be included in the Proposed Development, including those which can reduce emissions from surface access and airport operations, for example, through the removal of fossil-fuelled equipment, construction of an energy efficient new terminal building, generation of clean electricity, and supporting the move to electric vehicles and less carbon-intensive flight technologies.</p> <p>The Proposed Development has been informed by the Environmental Impact Assessment (EIA) process and mitigation for potential impacts has been incorporated. Further information on GHG emissions, including carbon dioxide, is set out in Chapter 12 Greenhouse Gases of the PEIR. The Draft Sustainability Statement also demonstrates how the Proposed Development complies with local and national emissions reductions targets.</p> <p>Additionally, GHG emissions are one of the factors considered under our GCG framework, information on which can be found in Table 4.1.</p>
<p>The Proposed Development should go further in responding to the climate change agenda.</p>	<p>As the owner of the airport, we are committed to reducing GHG emissions as far as practicable. An extensive list of mitigation measures will be included in the scheme, including those which can reduce emissions from surface access and airport operations. For example, through the removal of fossil-fuelled equipment, construction of an energy efficient new terminal building, generation of clean electricity, and supporting the move to electric vehicles and less carbon-intensive flight technologies.</p> <p>We are also proposing our GCG approach which will ensure “limits” in respect of carbon emissions are met, with further information on this in Table 4.1.</p>
<p>Suggest the airport minimise and mitigate its current greenhouse gas emissions, before or without expanding.</p>	<p>In collaboration with the airport operator, LLAOL, we have been actively minimising our Scope 1 (direct emissions from our owned and controlled resources) and Scope 2 (indirect emissions associated with the purchase of electricity or heat) carbon dioxide emissions over several years. The carbon intensity of flight operations and surface</p>

Key issue	Response
	<p>access have also been falling in line with industry trends.</p> <p>The opening of the Luton Direct Air Rail Transit (DART) will further encourage sustainable travel to the airport, and LLAOL is bringing forward additional measures to reduce the amount of carbon emitted by the airport in operation.</p> <p>Additionally, GHG emissions are one of the factors considered under our GCG framework, information on which can be found in Table 4.1.</p>
<p>Construction of the Proposed Development will result in GHG emissions and these should be reduced/minimised</p>	<p>The PEIR sets out a detailed narrative to the climate change mitigations proposed to apply during construction which will primarily be secured through the CoCP. A Draft CoCP is available in Appendix 4.2 of Volume 3 of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.</p>
<p>Climate change awareness will reduce demand for air travel in future.</p>	<p>We do not anticipate increased climate awareness reducing demand for air travel. The demand forecasts take into account that users will need to pay the cost of carbon or equivalent abatement costs.</p>
<p>The Proposed Development is incompatible with Government climate targets and legislation, such as the Climate Change Act.</p>	<p>Our Proposed Development is compatible with Government climate targets. Government policy supports the continued growth of aviation to 2050 and has explained in the Sixth Carbon Budget how this is consistent with reaching net zero by the same year. The Government is clear that it continues to support airports making best use of their existing runways^{xiii} and that it does not support demand management measures. This was confirmed as recently as July 2021 in the Jet Zero consultation^{xiv}.</p> <p>We are committed to playing our part in the decarbonisation of aviation and the UK economy as a whole, for example through the removal of fossil-fuelled equipment, construction of an energy efficient new terminal building, generation of clean electricity, and supporting the move to electric vehicles and less carbon-intensive flight technologies.</p>
<p>Measures in the Proposed Development intended to manage environmental impacts associated</p>	<p>Our GCG framework will ensure that the airport operates within particular “limits”. One of the limits will relate to carbon emissions. The relevant “limit” will be specified in a way which reflects the</p>

Key issue	Response
with climate change are inadequate and/or unrealistic.	ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals , with further information in Table 4.1.

4.4 Noise

- 4.4.1 Noise is an issue which the local community feel strongly about, and it was a key issue raised during consultation. A total of 1,474 community respondents included comments about the potential noise impact from the Proposed Development. In addition it was covered in seven responses from statutory consultees and 10 from local authorities. When asked what impacts respondents have experienced from current airport operations, 38% (1,346) of respondents stated that they had experienced noise pollution from the airport during the day, and 30% (1,081) during the night.
- 4.4.2 The most common comment raised by the local community was that existing noise from the airport is too high, with some noting that this had a negative impact on the health and well-being of local communities (842). Concern that expansion of the airport would increase noise pollution was also raised by many respondents (738). Some community respondents had particular concerns about night flights with many highlighting the impact this had on sleep disturbance and others suggesting night flights should be banned (72).
- 4.4.3 Some community respondents considered that proposals to mitigate noise impacts during construction and/or operation were either inadequate or would not be delivered (214). Similarly, some community respondents had concerns with the noise modelling and monitoring stating that it was inaccurate or not comprehensive (70).
- 4.4.4 There were several suggestions made for how noise could be reduced including solid noise barriers, altering flight paths, radar control for all aircraft, funding (including funding from the Future LuToN Impact Reduction Scheme for the Three Counties or FIRST) being directed to noise reduction, better reporting of complaints and training for flight crew in operational procedures (50).
- 4.4.5 Some community respondents raised concerns about potential construction noise (47) with others making suggestions for how this could be mitigated including limiting working hours, noise barriers, monitoring noise from construction vehicles, and a claim for damages procedure if breaches are made (19).
- 4.4.6 Statutory consultees and local authorities raised many of the same issues as community respondents, with many concerned about the future noise impacts from the airport. Additionally, these stakeholders raised technical queries about noise monitoring, assessment, and compensation.
- 4.4.7 Table 4.3 details the key noise issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.3: Noise key issues

Key issue	Response
Current noise levels from the airport are too high.	<p>Noise is a concern for many local residents. LLAOL as the current airport operator has responsibility for existing noise levels and more information about their approach to managing noise can be found on the airport website.</p> <p>Expansion of the airport should not mean that local communities suffer detrimental noise effects. As part of the Proposed Development, we are looking to introduce new measures to control noise, for example through the Noise Envelope and GCG which are explained below.</p>
Concern about the impact of increased flights resulting in more noise impacts.	<p>Our noise modelling shows that as the airport grows over time, noise levels will reduce as aircraft become quieter. As part of the Proposed Development, we are developing a Noise Envelope. The Noise Envelope will contain control measures to ensure that the Proposed Development cannot go ahead unless certain noise targets are met.</p> <p>In addition to the Noise Envelope there are other measures which can be used to ensure noise stays within the agreed limits.</p> <p>Airspace modernisation through the FASI-S process (modernisation of airspace across the South East of England) is currently being undertaken by the Civil Aviation Authority (CAA), this is expected to result in noise reductions even with the current generation of aircraft.</p> <p>The Noise Envelope will be the mechanism through which our GCG framework is monitored and enforced in respect of noise.</p>
Concern about noise from night flights.	<p>We understand that aircraft noise at night is the most detrimental in terms of health effects. Existing movement limits on aircraft movements at night and night quotas will be retained with no increase being sought.</p> <p>In line with the ICAO Balanced Approach, as required by EU598^{xv}, we are required to propose mitigation for aircraft noise in line with a hierarchy, with imposing operational restrictions on the airport the last resort (e.g. a scheduled night flight ban).</p>

Key issue	Response
	We are considering all practicable measures to reduce night noise.
There were differing views in respect of new aircraft technology with some respondents suggesting that new technology would mean planes will be quieter in future and other suggesting that this would not be the case.	Although the number of new generation quieter aircraft is low today, this is expected to change and by the time the Proposed Development is complete most of the aircraft operating at the airport will be new generation quieter types. Nonetheless, there will be controls in place which mean that unless noise limits can be achieved growth will be constrained.
Proposals to mitigate noise impacts during operation are inadequate or will not be delivered.	<p>All measures to mitigate noise and vibration generated during construction and operation of the Proposed Development will be investigated and adopted where practicable. Mitigation measures are covered in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR.</p> <p>New noise compensation schemes that improve on the current scheme will be adopted should consent for the Proposed Development be granted. Details of this can be found in the Draft Compensation Policies and Measures document.</p> <p>Additionally, proposals for a Noise Envelope have been developed with stakeholders to aim to control the growth of the airport based on defined noise targets. The Noise Envelope will be a statutory requirement for the airport to comply with.</p>
Concerns with the noise modelling and monitoring, including that noise contours do not cover the full extent of areas affected by noise.	<p>Noise predictions and assessment are based on best practice and current Government policy. The full detail of the methodology is set out in Chapter 16 Noise and Vibration of the PEIR. The approach follows national policy which defines the average daytime noise level that is considered equivalent to a low adverse effect. As part of the application for development consent the effect of noise due to the Proposed Development will be considered in detail in the ES. This will include analysis of noise from individual aircraft that will allow noise effects on communities outside the low adverse noise effect contours to be identified.</p>

Key issue	Response
	To ensure the accuracy of noise models we calibrated them using extensive noise monitoring.
Specific suggestions for how noise modelling should be undertaken.	All suggestions have been carefully considered. Noise predictions and assessment are based on best practice and current Government policy. The full detail of the methodology is set out in Chapter 16 Noise and Vibration of the PEIR. Noise models have been calibrated using extensive noise monitoring to ensure their accuracy. Leading up to this second round of Statutory Consultation, engagement on the noise and vibration assessment has also been continued with local authorities through a noise technical working group and through the Noise Envelope Design Group.
Concern about noise during construction.	A Code of Construction Practice (CoCP) will be implemented which organisations undertaking construction works will be required to comply with. This document will contain noise and vibration limits, construction working hours and mitigation measures that will need to be followed for the whole construction period. A Draft CoCP is available in Appendix 4.2 of Volume 3 of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.
The noise insulation scheme should be expanded or improved.	Please refer to Land and Compensation topic.

4.5 Flight paths and Fleet Mix

- 4.5.1 The flight paths used by aircraft landing and taking off at the airport and aircraft fleet mix, were topics which many community respondents felt strongly about. A total of 798 community respondents included comments covering these topics. In addition, there were responses from ten local authorities and seven statutory consultees.
- 4.5.2 The most common concern raised by community respondents was that the current aircraft altitude is too low resulting in negative impacts on quality of life in overflow areas (203). Some respondents were also concerned that future flight paths are unknown as the airspace redesign has not taken place and/or flight paths from other airport expansions such as Heathrow, Gatwick and Stansted are not yet known (66).

- 4.5.3 Community respondents recognised the potential that new generation aircraft (quieter and/or more fuel efficient) could have in reducing noise and air quality impacts, although many considered that the transition would not occur fast enough and/or would not make a difference (121). Lots of community respondents suggested that we commit to the use of electric/fuel efficient aircraft (135), or to a quieter fleet (94). However, others noted that we have no control over updating the fleet mix to new generation aircraft (85). Some respondents also had concerns that the fleet mix is continuing to shift to larger and/or noisier aircrafts (116).
- 4.5.4 Statutory consultees and local authorities raised many of the same issues as community respondents, with some concerned that we have no control over updating the fleet mix to a new generation fleet. These respondents were particularly interested in how the fleet mix assumptions had informed noise and air quality modelling, with some highlighting the reliance of noise modelling on assumptions made about the use of next generation aircrafts. Additionally, these stakeholders raised technical queries relating to future flight paths, arising from the AD6 (alterations to the arrival flight paths to the airport) and FASI-S (modernisation of airspace across the South East of England) airspace changes.
- 4.5.5 Table 4.4 details the key flight path and fleet mix issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.4: Flight paths and fleet mix key issues

Key issue	Response
Concern that current aircraft altitude is too low.	Separate to our proposals, noise improvements are likely to occur as a result of Civil Aviation Authority's Airspace Modernisation Strategy which sets out the initiatives that the UK industry will deliver to achieve the government's policies of quicker, cleaner, quieter journeys. This may allow for aircraft to climb more quickly due to the lifting of constraints imposed on aircraft from neighbouring airports. The application for development consent is assessing the impacts based on current aircraft performance and heights to be conservative.
Concern about the continued impact arising from current flight paths.	The effects of the Proposed Development including the flight paths are modelled and considered in the PEIR. Concerns related to current noise and the implementation of Area Navigation (RNAV) should be addressed to the airport operator, LLAOL.
Concern that the airspace in south east England is crowded (comprising aircrafts flying from	Adding more capacity to support growth in line with Government aviation forecasts remains the targeted outcome from the FASI-S process, which is a Government priority. It is a core requirement

Key issue	Response
Luton, Heathrow, Gatwick, and other London Airports).	<p>that this must be done in such a way as not to lower safety standards despite more aircraft in the sky. The new technologies being used by aircraft will enable Air Traffic Control to more accurately position aircraft in the sky to prevent any reduction in safety.</p> <p>In addition to modernising airspace, the FASI-S process seeks to create environmental benefits including the reduction in noise and emissions by allowing airspace to be used more efficiently.</p>
Concern that a transition in fleet mix to new generation (quieter/fuel efficient) aircraft will not occur fast enough.	<p>For the application for development consent, the future fleet mix is based on analysis of the likely timeframes over which airlines will replace their fleet, taking into account existing airline orders for new aircraft. The dominant low fare airlines at the airport replace their aircraft on cycles of between eight to 14 years in order to reduce the costs of maintaining older aircraft. Newer generation aircraft are already being introduced into the airline fleets at the airport. By the time the Proposed Development delivers any significant uplift in airport capacity (so permitting a significant increase in aircraft movements and passengers), many of the existing aircraft will have been replaced or coming to the end of their operating lives with the airlines in Europe. Further consideration will be given to whether it is appropriate to set targets for the airlines to operate quieter aircraft through the process of developing the Draft Green Controlled Growth Proposals.</p>
Due to recent experience, where the airport has reached its consented annual passenger limit before a transition to new generation aircraft had taken place, concerns were expressed that the new generation fleet mix may not be delivered over the time frame of the Proposed Development.	<p>It is important to note that the 18 mppa proposal, granted consent in 2014, was on the basis that 18 mppa would not be reached until around 2027/8. However, growth in demand for air travel accelerated across the UK and in the London area in particular, which meant the airport saw passenger growth ahead of the expected delivery of new aircraft. It is still anticipated that these new aircraft will make up a substantial proportion of the airline fleets by 2028. In the short term, due to delivery delays on the new generation Airbus aircraft as well as the grounding of the new generation Boeing-737Max, airlines have not been able to use these aircraft as early as expected.</p>
How will the airport ensure only fuel-efficient aircraft are used and	The fleet mix forecasts used for assessment are based on the current expectations as to the

Key issue	Response
commit to the future introduction of electric aircraft.	modernisation of the aircraft fleet. Our core assessments are based on known types of aircraft now entering service but sensitivity tests have been carried out to consider the effect of electric aircraft or other future types entering the fleets, and these are reported in the Draft Need Case . This will inform the setting of GCG limits. We will set ambitious targets for aircraft noise and carbon emissions and, in this respect, the type of aircraft become less important than the target. More details are included in the Draft Green Controlled Growth Proposals .
Request clearer details on future and/or current flight paths, including hours and frequency of operation.	Details of the operating patterns at the airport, including aircraft types and the pattern across the day (including night flying) are provided in the Draft Need Case . Future flight paths will be determined through the airspace change process promoted by others and not part of our application for development consent. As these are not yet clear, all the environmental assessments will be derived from the current flight paths on the basis that there should be a net benefit over and above anything set out in our proposals in terms of environmental impacts from any future changes to airspace.
Suggest there be an enforceable method of flight path control. Some methods cited include, the setting up of minimal impact routes; and fines for airlines deviating from the flight paths.	Aircraft are already required to fly within agreed flight paths, and controls and fines are in place to enforce this. However, once aircraft reach 4,000ft, they are no longer required to keep to the defined flight paths and can be routed away from the defined flight paths by Air Traffic Control. There will be an enforcement mechanism within our GCG framework covering air quality, noise, surface access and carbon emissions.
Suggest that the application for development consent does not proceed until future flight paths, arising from the AD6 and FASI-S airspace changes have been determined.	Due to the timescales over which both airspace change processes will take place, the application for development consent will continue to assess the environmental impacts associated with the current airspace and flight paths. Adopting this approach will represent the worst case for environmental impact assessment because the airspace change process, outlined by the CAA in CAP1616 ^{xvi} , makes clear that airspace changes require their own process of environmental assessment and can only be approved themselves when the effects are net beneficial. Assessments

Key issue	Response
	of the impact of potential options for future flight paths associated with AD6 and associated with the full modernisation of airspace in the South East of England (FASI-S) are being undertaken by the airport operator, LLAOL. Whilst the airspace change process is necessarily separate from the DCO process, these separate assessments have taken account of the growth forecast to be delivered through the DCO in assessing the impact of future airspace change.

4.6 Air Quality

- 4.6.1 Air Quality is an important issue for the local community and 1,146 community respondents provided comments on this topic. In addition there were nine responses from statutory consultees and seven from local authorities. When asked what impacts respondents have experienced from current airport operations, 24% (858 responses) of respondents stated that they had experienced air pollution from the airport.
- 4.6.2 The most common comment raised by the local community was concern that the Proposed Development will result in more air pollution with negative impacts on the health and wellbeing of local communities (248). Some community respondents commented that potential increases in air pollution from the Proposed Development would have adverse impacts on the natural environment, including the Chilterns Area of Outstanding Natural Beauty (AONB) (178). Similarly, a substantial number of community respondents expressed concern that air pollution would increase directly as a result of increased road traffic accessing the airport as a result of the Proposed Development (178).
- 4.6.3 In addition, some community respondents raised concern that the existing levels of air pollution from the current airport operation are high, with impacts to health, wellbeing and the natural environment (137).
- 4.6.4 Many community respondents expressed concern that the proposals to mitigate impacts on air quality are insufficient (191).
- 4.6.5 A number of suggestions were put forward for reducing air quality impacts from the Proposed Development, including use of electric aircraft, reductions in road traffic accessing the airport, introduction of more restrictive limits for air quality, improved monitoring and reporting on emissions, establishment of a new independent body to manage air quality impacts and improved compensation for affected local residents and adjacent local authorities.
- 4.6.6 Statutory consultees and local authorities raised many of the same issues as community consultees, with many concerned about the future air quality impacts from the airport. Additionally, these stakeholders raised technical air quality queries related to the modelling and mitigation proposed.

4.6.7 Table 4.5 details the key air quality issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.5: Air Quality key issues

Key issue	Response
<p>Concern that air pollution from the current airport operation is too high and that the Proposed Development will result in increases in air pollution.</p>	<p>Chapter 7 Air Quality of the PEIR assesses the air quality impacts of the Proposed Development, and Chapter 8 Biodiversity and Chapter 13 Health and Community consider how the air quality impacts affect human and ecological health. Where required mitigation is proposed to reduce emissions to air. All current air quality monitoring in and around the airport shows that NO_x and PM levels are all within UK objectives.</p> <p>We are proposing a GCG framework which will ensure that the airport operates within particular “limits”. This includes limits relating to air quality. The relevant “limits” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals – with further information in Table 4.1.</p>
<p>Concern that impacts to air quality from road traffic will be worsened by the Proposed Development, including potential breaches in air pollution limits and impacts to Air Quality Management Areas.</p>	<p>Chapter 7 Air Quality of the PEIR assesses air quality impacts of all potential impacts of the Proposed Development, including those from staff and passengers accessing the airport by road. Where required, mitigation is proposed to reduce emissions to air. There are no Air Quality Management Areas near to the airport.</p> <p>As part of the Proposed Development, we have set ambitious public transport mode share targets and are aiming to increase the share of public transport trips made by passengers from 38% (in 2019) to 45%.</p>
<p>Concern that the proposals to mitigate impacts on air quality are ineffective and insufficient or that adverse impacts (including health and quality of life) and damage to the environment are inevitable due to the scale of the Proposed Development.</p>	<p>Where required, mitigation is proposed to reduce emissions to air. The application for development consent will include a suite of commitments to ensure mitigation is delivered and these will be legal obligations. Our GCG approach also means that the airport will only be able to expand within</p>

Key issue	Response
	defined constraints on certain factors, including air quality.
<p>Suggestions for reducing air quality impacts from the Proposed Development, including use of electric aircraft, reductions in road traffic accessing the airport, introduction of more restrictive limits for air quality, improved monitoring and reporting on emissions, establishment of a new independent body to manage air quality impacts and improved compensation for affected local residents and adjacent local authorities.</p>	<p>All suggestions are welcomed, and many have been incorporated into the Proposed Development.</p> <p>We have set ambitious targets to increase the share of trips to the airport by public transport.</p> <p>Our proposed GCG approach will set “limits” for air quality, monitoring, and enforcement of which will be overseen by an independent body.</p> <p>We are also proposing the Community First scheme which will make funds available to community groups and Town and Parish Councils to address local needs in areas of high deprivation or for decarbonisation projects.</p> <p>Our core assessments are based on known types of aircraft now entering service but sensitivity tests have been carried out to consider the effect of electric aircraft or other future types entering the fleets, and these are reported in the Draft Need Case. This will inform the setting of GCG limits.</p> <p>We will set ambitious targets for aircraft noise and carbon emissions and, in this respect, the type of aircraft become less important than the target. More details are included in the Draft Green Controlled Growth Proposals.</p>

4.7 Natural Environment and Landscape

- 4.7.1 Natural Environment is a topic that the local community feel strongly about, with a total of 891 community respondents providing comments on this topic. In addition there were seven responses from statutory consultees and six from Local Authorities.
- 4.7.2 The most common comment raised by the local community was concern that the landscape mitigation proposals are inadequate to address the expected environmental impacts and loss of habitats from the Proposed Development (207). Similarly, some respondents raised concern that the existing airport operation already has a detrimental impact on the natural environment and biodiversity (92). A large number of community respondents highlighted concern

that the Proposed Development would result in further adverse impacts to the biodiversity from the destruction of habitats (170).

- 4.7.3 Many community respondents expressed concern that the Proposed Development would result in a net loss of open space, including publicly accessible parks as well as Sites of Special Scientific Interest (SSSI) and County Wildlife Sites (CWS) (160).
- 4.7.4 In addition, some community respondents highlighted concern that the proposed fuel pipeline would require destruction of habitats for its installation and may have leaks during operation with negative impacts to the natural environment and Green Belt (75).
- 4.7.5 A number of suggestions were put forward with regards to protecting the natural environment, including planting more trees, incorporating green roofs, undertaking re-wilding and committing to biodiversity net gain.
- 4.7.6 Statutory consultees and local authorities typically raised technical queries on the assessment, management and mitigation of impacts.
- 4.7.7 Table 4.6 details the key natural environment issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.6: Natural Environment and Landscape key issues

Key issue	Response
Concern that the landscape mitigation proposals are inadequate compared to the scale of the Proposed Development and its expected impacts to the natural environment.	<p>Landscaping is an important part of the Proposed Development. The proposed landscaping includes creating new areas of broadleaved woodland, meadow and pastoral grassland, a wildlife pond and new hedgerows. We will also deliver public realm landscaping across the airport to create an attractive environment, including for example street trees, native shrub planting and amenity grassland.</p> <p>The PEIR provides an assessment of impacts on the natural environment (Chapter 8 Biodiversity and Chapter 14 Landscape and Visual) and sets out mitigation measures to prevent, reduce or offset any significant impacts. Mitigation measures identified in the PEIR take into consideration feedback from stakeholders and the public.</p> <p>We have also committed to the Proposed Development delivering 10% biodiversity net gain through the extensive landscaping and habitat creation proposals incorporated within the Proposed Development. Further information on our proposals to limit impacts</p>

Key issue	Response
	<p>on habitats and the long term management and maintenance can be found in the Outline Landscape and Biodiversity Management Plan (Appendix 8.2 of Volume 3 of the PEIR).</p>
<p>Concern that the Proposed Development will lead to adverse impacts on biodiversity, habitats and ecosystems, with destruction of habitats posing significant risks for certain species.</p>	<p>Our Proposed Development includes a broad range of habitat creation and enhancement measures delivering benefits for biodiversity. The design of these measures has been informed by the EIA process and seeks to avoid and minimise ecological effects as far as reasonably practical. In addition to our on-site proposals we are proposing off site mitigation in the form of 'green corridors' created by restoring or planting new hedgerows. Furthermore, we have committed to the Proposed Development delivering at least 10% biodiversity net gain through the extensive landscaping and habitat creation proposals incorporated within the Proposed Development</p> <p>As a result of all these measures, we are having no significant adverse effects on any of the assessed species.</p>
<p>Concern that the Proposed Development will result in the loss of open space, including publicly accessible parks, as well as Sites of Special Scientific Interest (SSSI), Nature Reserves and Country Wildlife Sites (CWS).</p>	<p>We are committed to providing open space for the public to enjoy that is more attractive and more usable to a wider range of people than the publicly accessible areas currently available. We have worked hard to ensure that what we offer is not only of a very high quality but is also larger in size – the Proposed Development includes a 10% larger land area for a new Wigmore Valley Park that is much better connected to the existing area of open space.</p> <p>The Proposed Development has no direct effects on any SSSI including two CWS recently redesignated SSSI and one CWS being considered for SSSI status. Given the interest features of SSSIs in the wider area and their distance from the Proposed Development, it has been concluded that both the construction and operation of the Proposed Development will not result in any significant effects upon these sites.</p> <p>The majority of the current Wigmore Park CWS will be lost as a result of the Proposed</p>

Key issue	Response
	<p>Development. We have changed our design to retain as much of the existing park as possible, and designed the replacement area so that it offers greater opportunity to support biodiversity, including orchids.</p> <p>Dairyborn Scarp CWS is located within the Application Site and part of it will be lost as part of the Proposed Development. We therefore propose habitat management to improve the condition of the retained area as well as creation of new areas of habitat so that in time these offer an equivalent or greater opportunity to support biodiversity. Winch Hill CWS will not be subject to any direct habitat loss.</p> <p>Given the interest features of CWS and DWS in the wider area, and their distance from the Proposed Development, it has been concluded that both the construction and operation of the Proposed Development will not result in any significant adverse effects upon these sites.</p>
<p>Concern that the proposed fuel pipeline will have adverse impacts on the natural environment and associated Green Belt. Specifically, concern was raised on impacts during installation of the pipeline and the likelihood of leaks during operation.</p>	<p>The national fuel pipeline already exists to supply fuel to other locations throughout the UK. The proposal is to build a short spur connection, between the existing fuel pipeline and the proposed fuel storage facility at the airport.</p> <p>Careful consideration has been given to addressing the protections of the Green Belt around Luton and adjacent to the airport. In response to the concerns raised at the 2019 consultation we have given careful consideration to the optimal arrangements for the Proposed Development. Apart from the proposed new installation at the connection to the fuel pipeline for which very special circumstances will be demonstrated, the proposed fuel pipeline does not result in built development encroaching on Green Belt boundaries adjacent to the airport. The Surface Movement Radar also needs to be located within the Green Belt for operational reasons.</p> <p>It is proposed the short pipeline be installed below ground. The habitats above the pipeline route will be restored on completion of</p>

Key issue	Response
	<p>construction, and as such there will be no visible trace of the pipeline, apart from pipeline markers, after installation.</p> <p>It is proposed that the pipeline be fitted with a sophisticated and sensitive leak detection system which can detect and pinpoint the location of leaks within minutes of them occurring, which includes detection of deliberate interference. Furthermore, an aerial inspection will take place every two weeks to look for any unauthorised or suspicious activity along the route of the line. Monthly checks will also be undertaken on vulnerable locations and an annual line walk of the pipeline's entire length will be carried out. If a leak is detected there is an existing emergency procedure in place which will be followed.</p>

4.8 Historic Environment

- 4.8.1 A total of 27 community respondents, two statutory consultees and one local authority provided comments about the historic environment.
- 4.8.2 The most common comment raised by the local community was concern that the Proposed Development will negatively impact the historic and cultural heritage of the surrounding area during construction and/or operation (7). Some community respondents raised concerns about the impacts to historic towns, villages and countryside from the existing operation of the airport (5).
- 4.8.3 Several suggestions were also put forward for minimising impacts to the historic environment from the Proposed Development, including the creation of a cultural viewing area and increased funding for protection of heritage assets.
- 4.8.4 Statutory consultees and the local authority specific concerns on the impacts of the Proposed Development on Someries Castle and Luton Hoo. Additionally, these stakeholders raised technical queries about the methodology for assessing impacts to heritage assets and identifying appropriate mitigations.
- 4.8.5 Table 4.7 details the key historic environment issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.7: Historic Environment key issues

Key issue	Response
Concern that the Proposed Development will lead to adverse impacts on the historic and cultural heritage of the	Our design has taken into consideration the cultural heritage assets in the surrounding area in order to minimise any harm to their significance. Surveys and assessments have been undertaken to identify

Key issue	Response
surrounding area during construction and operation.	the level of impact of the Proposed Development on the historic environment and more information can be found in Chapter 10 Cultural Heritage of the PEIR. Where significant environmental effects have been identified, relevant mitigation is proposed. Engagement with Historic England is ongoing.
Concern that the airport already has a negative impact on the historic towns, villages and countryside that surround it.	<p>We have carried out an assessment of the potential effects of the Proposed Development on cultural heritage and landscape and visual amenity, these can be found in Chapters 10 Cultural Heritage and 14 Landscape and Visual of the PEIR respectively.</p> <p>The Proposed Development has been designed to minimise changes to the settings of heritage assets and minimise impacts. We will also enhance the historic landscape by including provision for the planting of hedgerows and hedgerow trees that are in-keeping with the historic landscape character of the area.</p> <p>The cultural heritage assessment considered heritage assets, comprising archaeology, built heritage and historic landscape receptors, within a 2km study area from the airport, and within a wider study area for assets that may experience change as a result of noise and/or visual impacts. The preliminary assessment set out in Cultural Heritage in Chapter 10 Cultural Heritage of the PEIR concludes there would be no significant effect to Someries Castle and a significant effect to Luton Hoo RPG during construction and operation of the Proposed Development. There are currently no suitable measures to mitigate these impacts. If suitable measures are identified during statutory consultation, these will be included in the ES.</p>

4.9 Water and Drainage

- 4.9.1 A total of 254 community respondents made comments about water and drainage. In addition, there were eight responses from statutory consultees and one from a local authority.
- 4.9.2 The most common comment raised by the local community was that the airport is located in a dry area that is already subject to high water demand and that the Proposed Development would lead to additional pressure on this resource (73). In objecting to the Proposed Development some community respondents considered that it would destroy natural drainage systems and open spaces in the local area (54).

- 4.9.3 In addition, some respondents raised concern that the drainage proposals do not adequately take account of the expected increase in frequency and severity of storm events as a result of climate change (40). In parallel, some respondents raised concerns that the proposed drainage measures are insufficient, and the Proposed Development will increase the risk of surface water flooding in the local area (35).
- 4.9.4 Concern that excavation and piling at the former Eaton Green landfill site could lead to ground water contamination was also raised by some community respondents (41). Similarly, some respondents raised concerns relating to other types of water contamination including impacts to chalk aquifers and local watercourses (27).
- 4.9.5 A number of suggestions were put forward for reducing impacts to water and drainage from the Proposed Development including improved re-use and recycling of rainwater/grey water, enhanced proposals to manage impacts from climate change on water and drainage networks, increased funding to be allocated to drainage proposals and inclusion of additional waterbodies.
- 4.9.6 Statutory consultees raised many of the same issues as community respondents, with many concerned about the future water and drainage impacts from the airport. Additionally, these stakeholders raised technical queries about drainage infrastructure, contamination and flood risk.
- 4.9.7 Table 4.8 details the key water and drainage issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.8: Water and Drainage key issues

Key issue	Response
Concern that the area surrounding the airport is a dry area with already high water demand, and any expansion would lead to additional pressure on this resource with potential water shortages and adverse impacts to quality of life, health and wellbeing for local residents.	<p>The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR, identifies measures to maximise water reuse and minimise water consumption associated with the Proposed Development during construction and operation. The identification of these measures and the production of these documents has been completed in close liaison with Affinity Water to capture any potential impacts on water supply within Luton. Discussions with the utilities companies are ongoing and in anticipation of water supply and water treatment challenges, the current design includes on site water treatment facilities and water recovery and reuse to reduce current water supply requirements.</p> <p>We have also agreed in principle with the water companies that we will not use any more water for business as usual operations</p>

Key issue	Response
<p>Concern that there are existing flood risks associated with the airport and that the Proposed Development will result in increased surface water runoff, causing greater flood risk to the local area.</p>	<p>than in 2019 when the airport had 18 mppa, even when we're at 32 mppa.</p> <p>The approach to drainage for the Proposed Development has been developed to provide a system that can collect and manage the surface water runoff generated by extreme rainfall events without putting airport users or the local residents at any increased risk of flooding.</p> <p>The drainage system has been designed for a 1 in 100 year flood event plus a 40% allowance for climate change.</p> <p>Principles of sustainable drainage have been applied and this is demonstrated with the preferential use of infiltration drainage. This ensures that water is not directed to rivers, stream or sewers at increased rates and volumes. Instead it is allowed to infiltrate into the underlying strata, mimicking natural conditions, while also ensuring that groundwater catchments and their conditions are taken into account. A Flood Risk Assessment can be found at Appendix 20.1 of Volume 3 of the PEIR.</p>
<p>Concern that the Proposed Development will disturb the previous Eaton Green landfill site beneath Wigmore Valley Park via excavation and piling, which may expose and mobilise existing contamination and introduce new pollution pathways into underlying groundwater and local rivers.</p>	<p>Building over landfill is common practice and there are well established best practice measures for working over such an environment which we will follow.</p> <p>We no longer intend to undertake remediation of the former Eaton Green landfill site but will, instead, use other techniques to build over this area. This removes the need for almost two years work treating the landfill which means a big reduction on construction impacts in the area.</p> <p>We have made changes to earthworks design which significantly reduce the volume of landfill required to be excavated and therefore associated impacts. In addition, a Preliminary Risk Assessment of Land Contamination (Appendix 17.1 of Volume 3 of the PEIR) has been undertaken which assesses the risks from piling and provides an evaluation of the most appropriate technique to be adopted to ensure that any</p>

Key issue	Response
	<p>contamination present is not mobilised. These measures will ensure that no new pathways are created and that no contaminants are inadvertently mobilised to the groundwater as part of the development works. Works will be carried out in accordance with all applicable regulatory requirements.</p> <p>A substantial amount of ground investigation has been undertaken, including monitoring of groundwater in the chalk beneath and surrounding the Proposed Development. This work has indicated that the former landfill in its current state is not adversely affecting groundwater conditions in the area. In order to ensure the development work does not change this, a Remediation Strategy (Appendix 17.5 of Volume 3 of the PEIR) has been developed. This includes details of measures to be undertaken to prevent any contaminants in the former landfill migrating into the groundwater in the underlying chalk.</p>
<p>Concern that there are existing water quality issues from contaminants associated with the airport entering local rivers, and that the Proposed Development will worsen this situation.</p>	<p>The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR contains a description of the operational drainage design which will be implemented to manage surface water run-off and pollution risk across the airport. The drainage design will ensure that any surface water run-off that triggers defined contaminant levels (to be agreed with the Environment Agency) will be treated to appropriate levels prior to discharging to soakaways on site.</p> <p>The drainage design also include measures to manage spillage risk under normal conditions, for example oil separators. Furthermore, the design incorporates attenuation and has been designed to accommodate a 1 in 100 year storm event plus a 40% allowance for climate change, and as such is able to handle extreme rainfall events.</p>

Key issue	Response
Concern that the drainage proposals do not adequately take account of the expected increase in frequency and severity of storm events as a result of climate change.	The drainage system has been designed for a 1 in 100 year flood event plus a 40% allowance for climate change.

4.10 Employment and Economics

- 4.10.1 Many community respondents shared their views about employment and economics matters associated with the Proposed Development, with the topic being covered in 1,591 community responses. There were a further seven responses from statutory organisation and nine from local authorities which covered this topic.
- 4.10.2 The majority of responses from the local community expressed support for the Proposed Development and the positive economic benefits locally, regionally and nationally; specifically, positive economic impacts on the local area including job creation, growth of local businesses and increased investment in the area (580).
- 4.10.3 There were many suggestions for maximising the employment opportunities associated with the Proposed Development. Many respondents suggested engaging with local education institutions and community organisations to promote employment opportunities (126). Others suggested that the Proposed Development should enable local recruitment and employment, for example by requiring a quota on local employees or working with local organisations such as schools and job centres (99). Other suggestions included supporting and promoting apprenticeship programmes for local residents and neighbouring communities (57).
- 4.10.4 Conversely, some community respondents considered that the Proposed Development would not have any economic benefits on a local, regional and/or national level (220). Others felt that the projected economic benefits of the Proposed Development had not been assessed in comparison to the environmental cost of expansion; and that any economic benefits are outweighed by environmental costs (373).
- 4.10.5 Respondents also expressed concern about the type of employment opportunities which might be created by the Proposed Development, citing that opportunities could be casual work or zero-hour contracts that will create and/or exacerbate poor working conditions for the local workforce (161).
- 4.10.6 A significant proportion of respondents believe that there are alternative methods to maximise employment, skills and training opportunities to benefit neighbouring communities which do not require airport expansion. Including investing in public transport, regenerating Luton, green infrastructure, renewable and/or green energy, green industries (279).

- 4.10.7 The comments received by statutory consultees and local authorities particularly emphasised the importance of working with stakeholders to develop proposals for employment, skills and training. Responses from local authorities particularly emphasised that economic benefits should be shared and invested locally to support community and business affected by the Proposed Development.
- 4.10.8 Table 4.9 details the key employment and economics issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.9: Employment and Economics Key Issues

Key issue	Response
<p>The Proposed Development will not have any economic benefits either locally, regionally and/or nationally.</p>	<p>With expansion to 32 mppa, the airport's economic impact will increase considerably. The number of direct airport-related jobs is expected to increase by 4,500 by the time the airport is handling 32 mppa.</p> <p>When indirect and induced jobs are considered, the total number of new jobs would be 4,800 in Luton, 6,600 in the three counties, and a total of 12,100 across the UK. The contribution of the airport's operation to the UK economy would also increase by over £1.6 billion by the time the airport is handling 32 mppa. Of this increase, £1 billion in total would be realised within the three counties region.</p> <p>Further information is set out in the Draft Need Case, Draft Employment and Training Strategy (ETS) and Chapter 11 Employment and Economics of the PEIR available as part of this consultation.</p>
<p>There are alternative methods to maximise employment, skills and training opportunities to benefit neighbouring communities which do not require airport expansion, for investing in other development projects or green industries.</p>	<p>The employment benefits of expanding the airport are described above and in more detail in the Draft Need Case. It is acknowledged that there may be other ways to improve the local economy, however the Proposed Development offers the best opportunity to achieve these goals.</p>
<p>The Proposed Development should support and promote the development of apprenticeship programmes to support the construction and operational phases. Respondents suggest targeting apprenticeship programmes toward local residents and neighbouring communities.</p>	<p>We agree. The Draft ETS identifies the potential role of apprenticeships within a wide range of initiatives to improve access to job opportunities. Apprenticeships will continue to be explored with local authorities and potential delivery partners.</p>

Key issue	Response
Local recruitment and employment should be encouraged and enabled for jobs created from the Proposed Development.	We agree. The Draft ETS identifies opportunities to encourage local recruitment, including working with local stakeholders and organisations.
The Proposed Development will result in positive economic benefits on the local area, regionally and/or nationally, including job creation, growth of local businesses and increased investment in the local area.	We agree. Further information can be found in the Draft Need Case .
Engage with local educational institutions (ranging from primary levels through to tertiary levels) and community organisations to promote education and employment opportunities.	We agree. Educational institutions and training providers will be engaged as part of the development of the Draft ETS to identify opportunities to maximise the benefits of the Proposed Development on development of skills and access to job opportunities.

4.11 The Design

- 4.11.1 Consultation respondents were interested in the proposed design of the airport and 837 community respondents provided comments. Comments on this topic were also received from one statutory organisation and seven local authorities.
- 4.11.2 The most common comment raised by community respondents was support for the proposed new fuel pipeline specifically highlighting the improved safety, efficiency, sustainability and traffic benefits (319). Many community respondents support a new pipeline to deliver fuel, on the condition that the pipeline can be constructed to ensure the protection and safety of the environment and local community (99). Many local community respondents expressed general support for the design, including the development of Terminal 2 and associated facilities such as the Luton DART, forecourt and coach station (101).
- 4.11.3 The majority of responses which raised concerns with the design expressed their objection to the Proposed Development in principle and therefore considered that no further comments on specific aspects of the design were necessary (118). Many respondents specifically noted their objection to the size, scale and location of the Proposed Development, with some respondents citing that there was insufficient space at the Application Site to accommodate the Proposed Development (46).
- 4.11.4 A significant proportion of respondents raised concerns regarding the safety and security risks associated with the proposed fuel pipeline and some asked for more information on the safety measures to be implemented to ensure public safety (102). Other respondents considered that planning for a new fuel pipeline contradicted ambitions to be more sustainable and achieve national net zero targets (86).

- 4.11.5 There were also many suggestions for the design of the new terminal, including that it should be sustainable and incorporate renewable energy, it should be accessible and easy to navigate, and should offer a pleasant passenger experience for example by having natural light and sufficient seating.
- 4.11.6 The responses from local authorities and the statutory consultee tended to focus on more technical detailed design matters, for example the proposed design and layout, access arrangement, the need for further assessment to meet Civil Aviation Authority standards and the requirement for renewable energy.
- 4.11.7 Table 4.10 details the key design issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.10: Design key issues

Key issue	Response
Concerns regarding the safety and security risks associated with the proposed fuel pipeline.	Refer to response in Table 4.6.
Object to the proposed design, specifically the size, scale and location of the expansion.	The location of the Proposed Development has been carefully selected through a three stage sift process whilst ensuring compliance with Government policy to make best use of the existing single runway ^{xvii} . We have incorporated flexibility into our design to allow incremental growth which responds to passenger demand, for example we have adjusted our second terminal to be modular. The scale of the development has also been designed and benchmarked against other UK airports of similar scale and intended airline users. The most recent sift report is appended to the Works Description Report available as part of this consultation, and previous sift reports are available on the Luton Rising website.
Permanently linking the airport to a piped supply of aviation fuel seems counter to requirements to move away from fossil fuels and meet UK targets on net zero carbon.	We have held discussions with the fuel companies in respect of Sustainable Aviation Fuels (SAFs). The rollout of these is expected to be led by the fuel refining companies and aircraft manufacturing companies. As SAFs become viable the percentage of SAF blended with the fuel received via the pipeline will increase. The fuel pipeline will therefore be part of the solution to decarbonise air travel. Whilst electric aircraft are being developed now, commercially and operationally viable aircraft will not be available for some time. Nevertheless our design safeguards for the future use of electric planes by providing a new electricity substation at

Key issue	Response
	Terminal 2 and safeguarding space on each stand for additional charging equipment. The use of hydrogen as fuel for aircraft is very immature, however our design does not preclude its use in the future.
The expanded airport should be accessible for disabled people.	The Proposed Development will be designed in full compliance with the Disability Discrimination Act 1995 and related legislation. Additionally, the airport is already required to provide assistance to Persons of Restricted Mobility at any stage of the passenger journey from arrival at the airport to the aircraft seat and the airport will continue to comply with all such obligations.
Suggest the new terminal should be as sustainable as possible.	The design includes numerous new sustainability measures, such as solar and geothermal energy, and rainwater harvesting. The new terminal will be designed to BREEAM Excellent and Passivhaus principles. More information can be found in the Draft Sustainability Statement .

4.12 Wigmore Valley Park

- 4.12.1 In total 436 responses from the community included comments about Wigmore Valley Park. In addition, there were three responses from statutory consultees and two responses from local authorities which covered this topic.
- 4.12.2 The most common comment raised by the local community was concerns about the loss of Wigmore Valley Park (200). Several respondents raised specific concerns about the impact in respect of wildlife and habitat, with some flagging that the established wildlife and mature trees cannot be replaced like-for-like, and that the replacement open space will not be effective in absorbing pollution for generations, which is inappropriate given the current climate crisis (140).
- 4.12.3 In addition, community respondents raised concerns about the lack of usage that the replacement open space would see (26), and others noted that the new park would be further away from local residents and closer to the runway, making it unpleasant for park users or that the proposed area is too small (62).
- 4.12.4 Suggestions from the local community included that the existing Wigmore Valley Park should remain, and that it should be improved and expanded rather than being part of the Proposed Development (83). There were many suggestions for the facilities which should be delivered as part of the replacement open space, these included sports provision, e.g. pitches, bike trails, exercise equipment and a skate park, as well as children's play areas, sufficient parking, and changing facilities (43). There were also suggestions from community respondents about the maintenance and management of the

replacement open space, which was felt would best be managed, funded and maintained economically by a Trust (7).

- 4.12.5 The comments received by statutory consultees and local authorities covered similar themes to those raised by the local community, including having concerns for the size and location of the park and loss of habitat. Local authorities in particular were keen to ensure that a suitable management and maintenance regime for the park is established.
- 4.12.6 Table 4.11 details the key Wigmore Valley Park issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.11: Wigmore Valley Park key issues

Key issue	Response
General objections to the loss of Wigmore Valley Park.	We recognise that Wigmore Valley Park is important to the public. We are committed to providing open space for the public to enjoy that is attractive and usable to a wider range of people than the current offer. We have worked hard to ensure that what we offer is not only of a very high quality but is also larger in size – the Proposed Development includes at least 10% larger land area for Wigmore Valley Park. We have changed our design to retain as much of the existing park as possible, and remodelled the new area so that it is much better connected to the existing area of open space.
Suggestions for improvements to the design of the proposed park including changing its shape and establishing more new habitats.	The open space proposals have evolved in response to feedback from the public and relevant statutory consultees. The amended proposals are less linear in arrangement and focus on establishing natural habitats delivering areas of meadow grassland, native shrub planting, broadleaf woodland and mixed species hedgerows with hedgerow trees.
Concerns around the smaller size of the replacement park, as well as it being located further from local residents, and closer to the runway, which will be loud and unattractive for park users.	We are committed to providing open space for the public to enjoy that is attractive and usable to a wider range of people than the current offer. We have worked hard to ensure that what we offer is not only of a very high quality but is also larger in size – the Proposed Development includes a 10% larger land area for Wigmore Valley Park. We have changed our design to retain as much of the existing Park as possible, and remodelled the new

Key issue	Response
	<p>area so that it is much better connected to the existing area of open space.</p> <p>Although the replacement open space will be located further to the east, the main entrance into Wigmore Valley Park from Eaton Green Road will be retained and overall accessibility and connectivity within the replacement open space will be improved, through the upgrading of footpaths and bridleways. These will be suitable for a range of users, including both walkers and cyclists, and appropriate signage and facilities will be included to help support various user groups. The replacement open space remains in relatively close proximity to the existing park and residential edge of Wigmore. It also falls within our ownership, can be provided with minimum disturbance to the public and would not be materially closer to the airfield or air traffic than the existing park.</p>
<p>Suggestions that the replacement open space should include additional facilities, such as sports provision, e.g. pitches, bike trails, exercise equipment, and a skate park, as well as children's play areas, sufficient parking and changing facilities.</p>	<p>The open space proposals take into consideration feedback from the public and relevant statutory consultees. The new park will include two children's play areas, a new skate park, refurbishment of the Wigmore Pavilion, a community building including a cafe and improved footpaths and signage around the park - we already have permission for these under our New Century Park planning permission (reference 17/02300/EIA) and intend to bring these improvements forward. We will deliver these sorts of facilities and improvements under our proposed application for development consent and consider all feedback received as we finalise our proposals.</p>
<p>Concern about the future management and maintenance of the park.</p>	<p>It is our intention that the new park be placed into the control of a new Community Trust which would include as Trustees, local community representation and other key stakeholders. We have committed funds within our future budgets to fund the maintenance of the park into the future.</p>

4.13 Impacts on Local Communities

- 4.13.1 Respondents felt strongly about the potential impact of the Proposed Development on local communities. This topic was covered by 1,363 responses from the community, eight statutory consultees and eight local authorities.
- 4.13.2 The majority of responses expressed general concern that the Proposed Development would have a detrimental impact on the quality of life for the local community, including in respect of health, air pollution, noise and traffic. Impacts such as noise, air quality and traffic are covered in more detail in the respective sections of this report. This section therefore covers more generic comments about local community impacts or specific comments which are not already covered in other topics.
- 4.13.3 The majority of response from the local community expressed general concerns regarding adverse impacts on the local community including noise pollution, air pollution, light pollution and traffic (1,022).
- 4.13.4 Many community respondents also cited concern about the impact of the Proposed Development on the health of local communities (449). Others were concerned that the Proposed Development would decrease property values in the area (52). Additionally, some community respondents felt the Proposed Development would increase the demand for housing and drive housing development at a rate that would change the character and amenity of the area (35).
- 4.13.5 Respondents also raised concerns on a number of more localised issues. A few respondents expressed concern that the Proposed Development would interfere with television signals (8) and queried how waste generated from the construction and operation of the airport will be managed, specifically any impact on the Tidy Tip (13).
- 4.13.6 The comments received by statutory consultees and local authorities cited similar concerns particularly emphasised the adverse impacts on the health and wellbeing of local residents. Local authorities also raised the wider impacts of the Proposed Development, such as the need for more housing which should be considered.
- 4.13.7 Table 4.12 details the key local community issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.12: Local Community key issues

Key issue	Response
Concerns that the Proposed Development will have an adverse impact on the health and wellbeing of residents.	The Health Impact Assessment in Chapter 13 Health and Community of the PEIR assesses the potential effect of the Proposed Development on the physical and mental health and wellbeing of local residents. This identifies that there will be positive benefits to the health and wellbeing of local

Key issue	Response
	<p>communities through the provision of jobs during construction and operation. However, it also identifies that there could potentially be negative impacts on mental health and wellbeing as a result of the demolition of the Prospect House Day Nursery and as a result of uncertainty and concern around the planning, construction and operation of the Proposed Development. Public consultation and engagement will provide information which may help to reduce uncertainty and stress, however, it is likely that some people's mental wellbeing within the affected communities will continue to be adversely impacted. In respect of the nursery we are working with the owners to identify a suitable alternative building.</p> <p>The assessment also identifies that there could potentially be negative effects on health for some people in certain locations due to changes to the environmental conditions, particularly noise, as a result of increased aircraft movements. The Proposed Development will incorporate measures to reduce noise effects as described in the Section 4.4 of this report, and in more detail in Chapter 16 Noise and Vibration of the PEIR.</p>
<p>Concern that the Proposed Development will lead to more housing development in the local area or there will be a lack of housing to accommodate the new workforce.</p>	<p>It is our intention that most of the new jobs created by the Proposed Development will go to local people. Rather than requiring more housing this is aimed at reversing the current daily net migration of people working away from Luton. We want more local people working locally – leading to better environmental outcomes, better quality of life, better social impacts and ultimately better health through these effects.</p>
<p>Concerns that the Proposed Development will interfere with public access to a television signal.</p>	<p>The Proposed Development will not interfere with television signals.</p>
<p>Concerns about how waste expected to be generated from the construction and operation of the Proposed Development will be managed, and in particular concern about the Proposed Development having an impact on the Tidy Tip.</p>	<p>The Proposed Development has been designed, as far as possible, to avoid effects related to waste and resources through option identification, appraisal, selection and refinement. Mitigation measures have been integrated into the design for the purpose of minimising effects related to waste and</p>

Key issue	Response
	<p>resources. These general measures focus on designing out waste and implementing the waste hierarchy.</p> <p>In respect of construction good practice mitigation, in the form of specific guidance on managing waste in accordance with the relevant regulations are outlined in the Draft CoCP (Appendix 4.2 of Volume 3 of the PEIR) and Outline Site Waste Management Plan (Appendix 19.1 of Volume 3 of the PEIR).</p> <p>The Proposed Development study area includes a safeguarded waste site (the LBC Household Waste and Recycling Centre also known as the Tidy Tip). However, it is anticipated that the Proposed Development will not conflict with or prejudice the site's waste management use, although the entrance will move from its current location in the north corner to the west side. The Tidy Tip will not be used to manage Proposed Development construction or operational waste.</p>
Request further engagement with the local community on the Proposed Development.	Further community engagement is being undertaken as part of this Statutory Consultation. Comments from the local community are encouraged and will be considered in developing the application for development consent.

4.14 Passenger Experience

- 4.14.1 In total 326 community respondents provided comments about the passenger experience. One local authority made comments on this topic and there were no comments from statutory consultees.
- 4.14.2 The most common comment raised by the local community regarded the current passenger experience at Terminal 1, with concerns including how busy the terminal is, the configuration of the terminal, the lack of available seating, and long distances to walk between checking in and boarding aircraft (124). Community respondents also raised concerns about the current check-in process at Terminal 1 which was considered to be poorly organised, slow and crowded (11), while others felt that too much space has been dedicated to retail, rather than seating for passengers (19).
- 4.14.3 There were many comments in support of the Proposed Development, which was felt to be an opportunity to enable additional flights to a greater number of

destinations (50) as well as improve passenger experience when using the airport (50).

- 4.14.4 There were several suggestions made for how passenger experience could be improved across both the existing Terminal 1 and the proposed Terminal 2, including increasing the amount of natural light and attractive public areas within the airport, modernising computer systems, increasing the training given to employees on customer service, and generally improving efficiency and passenger experience for airport users (37). Additionally, many community respondents suggested ways to improve accessibility, including reducing walking distances between the terminal and gates, using travelators, improved signage and wayfinding and covering exposed routes (31).
- 4.14.5 Table 4.13 details the key passenger experience issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.13: Passenger Experience key issues

Key issue	Response
General comments about the poor current passenger experience at Terminal 1.	<p>We recognise that many people are not happy with the passenger experience while using the existing terminal. Improvement works were underway before the 2019 consultation which exacerbated the poor experience. These improvement works have improved the experience at Terminal 1 in recent years. The Proposed Development includes an extension to Terminal 1.</p> <p>The design of Terminal 2 will be to modern standards, addressing many of the issues highlighted in Terminal 1, providing an improved passenger experience.</p>
Comments in support of proposals, as the Proposed Development will enable additional flights to a greater number of destinations and benefit passenger experience.	Support for the Proposed Development is welcomed.
The following suggestions were made for improving customer experience: improvements to terminal spaces and facilities, the modernisation of computer systems, employment and training focused on customer service, increased natural light, attractive public areas, improvements to efficiency, improve ease of access, and have specific airlines within each terminal.	<p>Suggestions for the detailed design of Terminal 2 are welcomed and will be considered at the detailed design stage. They will also be considered as part of the improvement works to Terminal 1 as part of the Proposed Development. Operational suggestions, such as staff training will be discussed with the operator at the appropriate time.</p>

Key issue	Response
<p>Suggest the airport should be designed to be accessible, with many respondents suggesting that the boarding of aircraft should be improved.</p>	<p>The proposed design of the new terminal safeguards the option of including passenger airbridges between departure gate and aircraft door. It should be noted however that the airlines using the airport tend to favour the use of steps rather than airbridges as it allows speedier boarding through both doors. The proportion of contact gates will increase as a result of the Proposed Development.</p> <p>The Proposed Development will be designed in full compliance with the Disability Discrimination Act 1995 and related legislation.</p>

4.15 Surface Access

- 4.15.1 Surface access was one of the most common issues which the local community provided comments on. A total of 1,933 community respondents included comments about surface access. In addition, there were responses from 12 statutory consultees and 15 local authorities. When asked what impacts respondents have experienced from current airport operations, 31% (1,105) of respondents stated that they had experienced traffic congestion caused by current airport operations.
- 4.15.2 The most common comment raised by the local community was that the Proposed Development will lead to an increase in traffic and congestion, which is already felt to be an issue in the immediate vicinity of the airport, as well as the wider highway network (977). Many respondents also felt that the road and junction proposals were inadequate and likely to be insufficient in mitigating the impacts of expansion (217), with the Proposed Development leading to additional negative impacts on the local community through increased traffic and congestion (249).
- 4.15.3 Parking was a controversial topic for the local community, with some community consultees suggesting that providing additional car parking spaces would encourage the use of private cars, leading to additional congestion and pollution (36). Other community respondents suggested that proposals do not include sufficient parking spaces for both airport users (48) and employees (12), which would lead to airport users parking on residential streets (84). The cost of parking was a common issue raised, with concerns around the current cost of parking and drop-offs, as well as concerns that future costs would be too high (147).
- 4.15.4 Some respondents felt that the mode shift targets were unachievable and too ambitious (78), with many feeling that the proposed improvements to public and sustainable forms of transport would not encourage their use sufficiently to meet targets, due to the lack of service accessibility, cost, network coverage and

frequency, paired with the convenience of cars (578). Others were concerned achieving the mode share targets as part of the Proposed Development would place strain on the existing rail network, which is already considered to be at capacity (86). Many community respondents felt that the local public transport provision is insufficient, including in respect of coverage, frequency and reliability (195), and would need to be improved in order to sufficiently contribute towards the mode shift targets (65).

- 4.15.5 However, there were also a range of comments in support of the surface access proposals which community respondents felt would improve traffic and congestion (80). Also, there were comments supporting the mode share targets, which were felt to provide the opportunity to encourage the use of public transport in accessing the airport (385). Others were also supportive of the targets but felt that they should be met without the progression of the Proposed Development (216).
- 4.15.6 Statutory consultees and local authorities raised many of the same issues as community consultees, which included many concerns about the future impacts on the local highways network, as well as public transport services as a result of the Proposed Development. Additionally, these stakeholders raised technical queries on modelling and forecasting.
- 4.15.7 Table 4.14 details the key surface access issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.14: Surface Access key issues

Key issue	Response
<p>The Proposed Development will lead to an increase in traffic and congestion, which is already felt to be an issue in many areas surrounding the airport.</p>	<p>As part of the Proposed Development we are aiming to increase the percentage of people who access the airport by public transport. The Luton DART will be open when the Proposed Development is delivered, providing a direct link to Luton Airport Parkway Station. A new coach station is also proposed as part of the Proposed Development, we also propose to expand the coach facilities at the existing terminal. We are in discussion with bus providers to increase the coverage and frequency of services to the airport.</p> <p>Despite measures to increase the proportion of journeys to the airport by public transport, additional car journeys will be required due to the growth in passengers as a result of the Proposed Development. The proposed strategy aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling</p>

Key issue	Response
	<p>to minimise additional journeys during peak highway periods. The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.</p> <p>We are also proposing a GCG framework which will ensure that the airport operates within particular “limits”. This includes limits relating to surface access – specifically, mode share. The relevant “limits” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals.</p>
<p>The proposed improvements to sustainable transport modes are not sufficient enough to encourage their use.</p>	<p>As part of the Proposed Development we have set ambitious public transport mode share targets and are aiming to increase the share of public transport trips made by passengers from 38% (in 2019) to 45%. The Proposed Development includes measures to encourage public transport use, including a new Luton DART station at Terminal 2 and a new coach station. We are in discussion with bus providers to increase the coverage and frequency of services to airport.</p> <p>We are confident that the sustainable transport targets will be achieved, as evidenced by historic increases in public transport use in accessing the airport.</p>
<p>Concerns around the impact the Proposed Development will have on the capacity of local rail services, which are already considered to be overcrowded.</p>	<p>We have carried out a public transport study mainly looking at rail capacity and future opportunities within the life of existing franchises/services and improvements already committed to.</p> <p>Peaks in air passenger rail demand do not coincide with commuter peaks. Analysis shows that in 2043, if services remain as at present, the additional rail demand from air</p>

Key issue	Response
	passengers will take a maximum of 6% of the available capacity (seated and standing) in the peak periods (07:00-10:00 and 16:00-19:00). This is summarised in the Getting to and from the Airport – Our Emerging Transport Strategy consultation document.
Supporting comments regarding the mode share targets, as it was felt that public transport improvements will encourage the use of these in accessing the airport.	Comments are welcomed.
Concerns that the road and junction improvement proposals are inadequate and/or insufficient, with some particular concerns that there are already issues which will be exacerbated by the Proposed Development.	<p>A significant number of highway improvements are proposed in order to mitigate existing congestion and provide capacity for airport growth.</p> <p>The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate.</p> <p>Detailed assessments of the proposed highway layouts have been undertaken to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities. We are committed to ongoing monitoring of highway network performance and interventions being made as appropriate.</p> <p>Furthermore, surface access is one of the topics for which limits will be set as part of our GCG framework. Further information can be found in the Getting to and from the Airport – Our Emerging Transport Strategy consultation document.</p>
Concerns that it is unclear how the targets of increasing the number of passengers travelling to and from the airport using public transport to at least 45% have been derived, or that the targets are unachievable.	<p>We carried out public transport investigations which included assessing rail capacities and identifying which additional trips could access the airport by public transport. This was then applied to our modelling work to ensure a robust approach.</p> <p>Rail improvements already in place, plus contactless payment (recently introduced), have already contributed to a significant</p>

Key issue	Response
	<p>increase in the public transport mode share from 32% (in 2016) to 38% (in 2019). Luton DART and Crossrail should make a significant additional contribution. As background traffic levels increase on the wider network, road congestion will also encourage greater use of rail over time. If development consent is granted the airport would also become even more of a coach hub as operators take the opportunities to extend and consolidate their networks.</p> <p>We therefore believe that the 45% target achievable and further information can be found in the Getting to and from the Airport – Our Emerging Transport Strategy consultation document.</p>

4.16 Land and Compensation

- 4.16.1 Our proposals for land and compensation was a topic raised frequently by the local community during consultation. A total of 920 community respondents included comments about land and compensation. In addition, seven statutory consultees and seven local authorities made comments on this topic.
- 4.16.2 The most common comment raised by the local community was concern about the FIRST proposals, which were considered to be ineffective and insufficient in mitigating the impacts of the Proposed Development (297). Similarly, there were concerns with the three noise insulation compensation proposals, which were felt to be inadequate, due to the level and type of compensation offered (226). Specific concerns were raised that the noise insulation compensation proposed is ineffective for older and listed homes.
- 4.16.3 There were also objections to the use of Compulsory Purchasing Orders (CPO) being used to support the Proposed Development (197), with some community respondents considering them to be undemocratic. Some community respondents also stated that reducing the noise of aircraft is impossible, and therefore any form of mitigation will be ineffective against current and future noise levels (168).
- 4.16.4 The area covered by the noise insulation compensation proposals was a highly contested issue for community respondents, with many members of the local community not living within the area covered but feeling that they are impacted by noise levels currently (144).
- 4.16.5 Statutory consultees and local authorities raised many of the same issues as community consultees, with some suggestions for those covered by the compensation schemes to be able to make their own decisions regarding what form of insulation they opt for.

4.16.6 Table 4.15 details the key land and compensation issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.15: Land and compensation key issues

Key issue	Response
<p>Concerns with the FIRST proposals, which was considered to be ineffective and insufficient in mitigating the impacts of the Proposed Development.</p>	<p>In our last consultation we set out how we wanted to share the benefits of airport growth with neighbouring communities and proposed a new fund which we called FIRST. The aim of this was to make funds available to our neighbours to use for projects related to either, Community, Environment, or Access.</p> <p>We still propose to establish a similar fund, but having reflected on it we feel it could be put to more direct beneficial use, in line with our social and environmental ethos, by targeting areas of high deprivation in the region and by helping to finance local decarbonisation projects. As well as fitting better with our own values, we also believe this approach is better aligned with the national levelling up and decarbonisation agendas promoted by the government. To better reflect this revised approach we have renamed the fund 'Community First'.</p> <p>We propose that Community First will provide £1 in funding for every additional passenger above the passenger cap current at the time that our DCO is consented. The available total Community First fund has the potential to raise up to £13m per year.</p> <p>The fund will be available to communities in Central Bedfordshire, North Hertfordshire, St Albans, Dacorum, Stevenage, Welwyn, Hatfield, eastern parts of the former Aylesbury Vale district and parts of East Hertfordshire.</p> <p>Community First is not intended to mitigate impacts – that is the role of mitigation identified and secured through the ES that will be submitted with the application for development consent.</p>
<p>Concerns that the three Noise Insulation Schemes are inadequate, for example because the amount is too low, glazing does not reduce noise when windows are open or when local communities are</p>	<p>The proposed compensation and Noise Insulation Schemes we consulted on in 2019 already represented a significant improvement on the current offer at Luton, and were more generous than any other UK airport. Since then other airports have moved</p>

Key issue	Response
<p>outside, and the glazing is not suitable for all building types.</p>	<p>on and we have also further improved our offer such that it stands to be best in class in terms of UK airport noise compensation schemes.</p> <p>In line with the proposed policy changes set out in 'Aviation 2050: The future of UK aviation. A Consultation^{xviii}' in developing the proposed Noise Insulation Schemes, we have reviewed the existing scheme in light of the feedback received and extended the noise insulation policy threshold beyond the current 63dB LAeq,16h contour. The proposed Noise Insulation Schemes have been designed to significantly improve on the current noise insulation scheme not only by increasing the number of properties which may be eligible under the new proposals schemes but also by substantially improving the level of contribution.</p> <p>All eligible properties making an application under the Noise Insulation Schemes will be visited by an assessor appointed to agree with the owner what works can/should be undertaken. If listed building consent is required, the owner will need to obtain this in the same way they would for any other changes to the property before the works could be undertaken.</p> <p>Further information is available in the Draft Compensation Policies and Measures consultation document.</p>
<p>General objections to the use of CPO to support the Proposed Development.</p>	<p>The Proposed Development has been designed to minimise land required which is not within our existing ownership, however a certain amount of additional land will be required to deliver the Proposed Development. It is usual for major infrastructure projects, such as ours, to include relevant compulsory acquisition powers (which will have to be justified). It should be noted that compulsory acquisition powers sought in our case are relatively limited.</p> <p>Our intention is always to acquire land/rights by agreement and compulsory acquisition</p>

Key issue	Response
	powers will only be used where agreement cannot be reached.
Concerns that the current noise insulation scheme are ineffective and insufficient.	LLAOL is responsible for managing its existing noise insulation scheme. Further details can be found on the FutureLuton website. We are not consulting on the existing compensation but are seeking views on future compensation proposals which are more generous than the existing.
The geographical area covered by the Noise Insulation Schemes is too small.	The main criteria for eligibility for the Noise Insulation Schemes is that the property will need to be within the requisite noise contours at the time of the opening of the Noise Insulation Scheme in question: 69dB (LAeq,16h) for voluntary scheme, 66dB (LAeq,16h) for hardship scheme, or 60dB (LAeq,16h), 57db (LAeq,16h) or 54dB (LAeq,16h) for noise insulation. This is a more generous offer than other airports. Eligibility details can be found in the Draft Compensation Policies and Measures consultation document. Noise contour forecasts would be published annually so people know if they are eligible.
General comments of support for the compensation and Noise Insulation Schemes.	Comments are welcomed.

4.17 Construction and Phasing

- 4.17.1 There were 518 comments from community respondents on the construction and phasing of the Proposed Development, as well as six from Statutory Consultees and five from local authorities.
- 4.17.2 The most common comment raised by the local community expressed an overarching opposition to the Proposed Development, thus respondents deemed the proposals to manage construction (75), any preparatory works (64) and the proposed earthworks (55) as unnecessary. Several respondents acknowledged the proposals to manage construction and the proposed preparatory works but deemed them inadequate (51 and 64 respectively), with some feeling that they do not enable the airport to be a 'good neighbour' and that the proposed mitigations would not go far enough to minimise disturbance.
- 4.17.3 A number of comments addressed a concern that the proposed preparatory works should not commence prior to permission for the Proposed Development being secured (47), with some respondents feeling that dedicating resources to

any enabling works before full permission is secured is inappropriate and pre-emptive. Some community respondents were concerned about the duration of construction works (26) and overall phasing (24) of the Proposed Development, as well as more specific timings (5), with a conflict existing between those who would prefer lower levels of disturbance over a longer period, and those who would rather a shorter, more intense period of construction.

- 4.17.4 Other concerns raised included issues around the earthwork proposals, including its environmental impacts (30), inadequacies (25) and safety (18), with an emphasis on the immediate effects that construction works may have at a local level.
- 4.17.5 The suggestions made primarily related to the timing of the construction works and there was a conflict between those who would prefer continuous works through the day and night to shorten the overall duration of disturbance and those who wish to have more constricted hours of construction (54). Other suggestions included delivering Wigmore Valley Park in advance of the main works (18), using electric vehicles/rail (18), and reviewing air travel demand throughout the construction period (16).
- 4.17.6 Statutory consultees and local authorities also provided comments regarding the duration of the construction works, hours of construction and effectiveness of mitigation measures, amongst others. Many also expressed specific interest in the potential impact of the proposals on their own assets and operations.
- 4.17.7 Table 4.16 details the key construction and phasing issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.16: Construction and Phasing key issues

Key issue	Response
Concern that the proposed earthworks and/or landscaping, will cause a negative environmental impact.	The CoCP will contain a suite of mitigation and management measures to ensure that the environmental impacts of construction, including earthworks and landscaping, are avoided where possible and otherwise minimised. It will be a legal requirement for the contractor to comply with the CoCP under the DCO. Further guidance on specific areas such as the management of earthworks and ground water control will be considered from industry best practice guidance documents as established in each environment topic section of the CoCP. A Draft CoCP is available in Appendix 4.2 of Volume 3 of the PEIR.
Concern regarding the pace, duration and/or cost of the proposed phasing, some respondents noted works were	The high-level phasing plans respond to forecast passenger demand. On a project of this scale and duration the construction plan needs to provide the flexibility to respond to changing demand.

Key issue	Response
phased too quickly and others noted it was phased too slowly.	
Concern about the hours of construction and the potential impacts upon neighbours.	<p>Core construction working hours will be from 08:00 to 18:00 on weekdays (excluding bank holidays) and from 08:00 to 13:00 on Saturdays. These are standard hours for large construction jobs and aim to minimise impacts on people who live nearby, although we acknowledge that it is not possible to meet the needs of all our neighbours in this respect.</p> <p>Construction noise will be mitigated through implementation of Best Practicable Mean, as defined by Section 72 of the Control of Pollution Act 1974^{xix} with construction working limited to specified times.</p>
Concern that the proposals to manage the construction works are of poor quality and/or do not enable the airport to be a 'good neighbour'.	<p>A CoCP will be secured through the DCO to manage the potential impacts of construction. This will include provisions to ensure that the contractor complies with best practice measures. A Draft CoCP is available in Appendix 4.2 of Volume 3 of the PEIR.</p>
Suggest that Wigmore Valley Park be delivered before the main construction works start.	<p>We are happy to commit to commencing our proposals for the improvements to Wigmore Valley Park before any work is undertaken in the current park. This is the first item on our list for delivery at the earliest opportunity, with work on the new park commencing early (and in advance of the application for development consent approval where practical and permissible).</p>
Suggest that a review of air travel demand is undertaken throughout the Proposed Development's phased construction.	<p>We have incorporated flexibility into our design to allow incremental growth which responds to passenger demand, for example we have adjusted our second terminal to be modular.</p>
Suggest consideration of the use of electric vehicles and trains for construction.	<p>The UK construction industry is adopting the use of electric vehicles and the UK Government's targets for net zero will accelerate the adoption which can be seen in the supply chain. We are aiming for our construction to be net zero, for more information see the Draft Sustainability Statement.</p> <p>Construction of an additional railway siding for the delivery of bulk materials to the Proposed Development is not technically feasible due to a lack of space.</p>

4.18 Planning

- 4.18.1 A number of comments were received in regard to planning matters associated with the Proposed Development, of which, 778 were comments by community respondents, 11 were from statutory consultees and nine from local authorities.
- 4.18.2 The most common comment raised by the local community was the concern that previous commitments have not historically been delivered, including those in planning conditions (246) or that previous mitigation has not been effective (195). Several community respondents also raised concern that there is a conflict of interest between LBC's ownership role and role as the Local Planning Authority (208).
- 4.18.3 Some community respondents expressed support for the Proposed Development boundary and layout for the Proposed Development (48). However, some felt that the Application Site boundary is too large (82).
- 4.18.4 Some community respondents suggested that we should mitigate current impacts from the airport (61), and that we and the operators must abide by all planning conditions and deliver mitigation measures (32).
- 4.18.5 Statutory consultees and local authorities were particularly interested in understanding the mechanisms for securing mitigations.
- 4.18.6 Table 4.17 details the key planning issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.17: Planning key issues

Key issue	Response
Concern that previous commitments made have historically not been delivered, including those in planning conditions.	Compliance with existing planning conditions is a matter between the current operator, LLAOL, and the Local Planning Authority. We are consulting on our Proposed Development which is a DCO application made by the airport owner, Luton Rising, to central Government, so it is not appropriate to compare it to historic commitments made in planning applications by the operator. Additionally, the DCO is a Statutory Instrument, as a result the Requirements (planning conditions) set within it will be a matter of law.
Concern that there is a conflict of interest between LBC's ownership role and role as Local Planning Authority.	LBC is neither the applicant nor the Local Planning Authority for this application so there is no prospect of any conflict of interest for LBC. LBC is instead a statutory consultee like the other host local authorities. LBC will consider the proposals and prepare a Local Impact Report in the same way that the other host authorities will. This will be considered by the

Key issue	Response
	Planning Inspectorate in its assessment of the proposals before making a recommendation to the Secretary of State for Transport, who has the ultimate approval powers.
Concern that mitigation delivered historically has not been effective.	Compliance with existing planning conditions is a matter between the current operator, LLAOL, and the local planning authority. This is an application by Luton Rising to central Government with legally binding Requirements. We are also proposing a GCG framework which will be a legally binding, independently monitored, framework which will ensure that the airport operates within particular environmental “limits”. The full details of GCG are contained in the Draft Green Controlled Growth Proposals .
Concern that size of the Proposed Development boundary is too large.	The Proposed Development boundary has been designed to incorporate all the land required to accommodate the Proposed Development and no more than is needed.
Concern that permission is being sought for preparatory works related to the Proposed Development prior to determination of the application for development consent which would pre-empt approval and undermine the planning process.	It is not the intention to seek planning permission for any preparatory works ahead of the application for development consent.
Concern that proposals to manage and mitigate the impacts of the Proposed Development are inadequate and/or will not be delivered.	The draft DCO that accompanies the application for development consent will include mechanisms for securing mitigation identified in the Environmental Statement and other application documents. Additionally, our approach to GCG will also ensure that mitigations are delivered. It is proposed that GCG will be monitored by an independent body, and where necessary mitigation measures will be tightened or brought forward to ensure that the Proposed Development keeps within the defined limits.
Suggest that the Proposed Development remains within LBC's boundary and/or outside of Green Belt land.	Minor development is proposed in the Green Belt outside of the LBC boundary. The Planning Statement submitted with the application for development consent will set out the very special circumstances justifying this development and its potential impact. Other

Key issue	Response
	aspects of the Proposed Development which are outside of the LBC boundary are where there are highway improvements in Hertfordshire and Central Bedfordshire.
Concern that the current location of the airport is not suitable for expansion.	Government policy supports making the best use of existing runways, this is set out in 'Beyond the Horizon - The Future of UK Aviation: Making Best Use of Existing Runways' ^{xx} .

4.19 Consultation

- 4.19.1 Responses were also received about the consultation process itself, with 402 community respondents covering this topic, as well as seven statutory consultees and nine local authorities.
- 4.19.2 The most common comment raised by the local community was that the information provided in the consultation documents did not meet their expected standards (89), with some respondents left feeling uncertain about the impacts of the Proposed Development due to the confusing nature of the documents. Similarly, there were a number of concerns regarding the quality of the questionnaire which some felt was badly formulated and confusing (62) or was too long (20).
- 4.19.3 Some community respondents expressed concern that the consultation process was predetermined and was being carried out in an obligatory manner which did not adequately acknowledge the concerns raised by consultees (92), which left some feeling that expansion of the airport was inevitable and that their voices have not been heard. Other respondents felt that the process had been 'short-circuited' by proposing an increase in airport capacity which could increase noise (26), with some noting that this goes against the intentions of Project Curium to reduce noise.
- 4.19.4 Some community respondents raised concerns about the consultation events, in particular the location or timing (14) and staff preparedness (12).
- 4.19.5 The majority of suggestions made by respondents reflected a desire for further engagement with local communities and those with an interest in the Proposed Development (48), with some emphasising a desire for an ongoing form of engagement which would enable interested parties to be kept well informed of the progress and provide an opportunity for the community to feedback on issues as they arise.
- 4.19.6 Statutory consultees and local authorities also expressed a desire for the engagement process to continue beyond the formal consultation period and to keep channels of communication open so that issues specific to certain bodies can be given the necessary attention.

4.19.7 Table 4.18 details the key consultation issues. Detailed responses to all comments can be found in **Appendix A**.

Table 4.18: Consultation key issues

Key issue	Response
<p>Concern that the location/timings of consultation events did not enable all interested parties to attend.</p>	<p>The locations of events were decided in consultation with the host and neighbouring local authorities through consultation with them on the SoCC. In total 35 exhibitions were held covering a wide geographical spread. Events were deliberately held at different times to facilitate attendance; most started in the afternoon and went on until 8pm allowing people to attend after work. Additionally, six events were held on Saturdays. Several pop-up events were also held.</p> <p>In addition to the physical events consultees were able to access the information in a variety of ways: they could view documents on the website or at one of the Document Inspection Venues described in Section 2.7 of this report. They could also email questions, call us, or request documents on USB sticks.</p>
<p>Concern that the consultation events were not of a high quality, for example there was a lack of information regarding the Proposed Development and that events were not consultative in nature but presented established designs.</p>	<p>Information was provided in a variety of formats - an information booklet providing a high-level summary, the Guide to Statutory Consultation providing more detail and signposting technical material such as the 2019 PEIR, and the detailed technical documentation. A suite of plans was also available. A balance was sought in providing the necessary technical detail whilst also ensuring documents were written in a non-technical style and in plain English. Where there were acronyms, their meaning was explained in a glossary. In addition, consultation events were held across the area so that people could talk directly with the project team to ask questions.</p> <p>A feedback form was available at events, online and via the post on request, this was used to capture feedback in a clear unambiguous way. All feedback has been considered and is reported in this 2019 Statutory Consultation Feedback Report. A final Consultation Report will also be submitted with the application for development consent.</p>

Key issue	Response
<p>Concern that staff were not well prepared for consultation events and gave poor quality information.</p>	<p>Comments about staff at events is noted and all staff involved in the 2022 Statutory Consultation have been briefed in advance.</p>
<p>Concern that the consultation feedback form comprised questions that were misleading, inadequate or unclear. Additionally, the feedback form was too long.</p>	<p>The feedback form included a range of questions which were mostly open-ended to allow respondents the opportunity to express their opinion on a range of topics clearly. Respondents were also able to submit their views in a freeform letter or email. All responses received, regardless of their format, have been carefully considered in developing our proposals.</p> <p>Views on the length of the feedback form have been taken on board and a shorter form is being used for the 2022 statutory consultation.</p>
<p>Concern that the consultation was predetermined in favour of the Proposed Development and that expansion of the airport was presented as inevitable throughout the process.</p>	<p>The 2019 consultation was undertaken to meet the Planning Act 2008 requirements to consult with people in the vicinity of the Proposed Development and other stakeholders. The 2022 consultation will meet the same requirements. All information received through the previous consultations has been carefully considered and we have made changes to the scheme in response, as described in this report. We will also be carefully considering the feedback received from this consultation.</p> <p>All feedback will be reported as part of the proposed application for development consent which will be examined by the Planning Inspectorate, who will make a recommendation to the Secretary of State for Transport for a decision. Information presented sought to present an accurate view of the Proposed Development including the potential impacts. For further information in respect of prior determination refer to the Planning topic.</p>
<p>Suggest further engagement is carried out with local communities, business, stakeholder and those with an interest in the Proposed Development.</p>	<p>This further round of statutory consultation allows a further opportunity to comment on the Proposed Development. Additionally, we have continued to engage with a range of stakeholders outside the formal consultation and will continue to do so.</p>

5 NEXT STEPS

- 5.1.1 This 2019 Statutory Consultation Feedback Report is published as part of our second round of statutory consultation. As part of this, views are sought on the Proposed Development, and, as for the 2019 feedback, all comments received will be carefully considered in developing our proposal.
- 5.1.2 Our application for development consent will include a Consultation Report, this will include a detailed record of how both rounds of statutory consultation were undertaken along with a record of all comments received and how we have had due regard to them in developing the Proposed Development. It will also set out how we have considered comments received in the non-statutory consultation

GLOSSARY AND ABBREVIATIONS

Term	Definition
ACOG	Airspace Change Organising Group
ACP	Airspace Change Proposal
AD6	Airspace change process concerning alterations to the arrival flight path to London Luton Airport
AEDT	Aviation Environmental Design Tool
AMSL	Above Mean Sea Level
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
ARN	Affected Road Network
ASMGCS	Advanced Surface Movement and Guidance Control System
ATC	Air Traffic Control
ATM	Air Transport Movement
BREEAM	Building Research Establishment's Environmental Assessment Method
C	Change. Used in Appendix A to describe whether there has been a change to the project in response to the comment (Y = Yes / N= No).
CAA	Civil Aviation Authority
CAP1616	CAP1616: Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information
CAP771	CAP 771: Connecting the Continents: Long Haul Passenger Operations from the UK
CBC	Central Bedfordshire Council
CC	Community Consultee - Community Consultees with whom we have a duty to consult as prescribed under Section 47 of the Planning Act 2008
CCB	Chilterns Conservation Board

Term	Definition
CCG	Chilterns Countryside Group
CDEW	Construction Demolition and Excavation waste
CIL	Community Infrastructure Levy
CIRIA	Construction Industry Research and Information Association
CL:AIRE	Independent organisation established to stimulate the regeneration of contaminated land in the UK
CoCP	Code of Construction Practice
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
CO2	Carbon dioxide
CPO	Compulsory Purchase Order
CTMP	Construction Traffic Management Plan
CWS	County Wildlife Sites
dB	Decibel
DBC	Dacorum Borough Council
DCO	Development Consent Order
DfT	Department for Transport
DIV	Document Inspection Venue
DMRB	Design Manual for Roads and Bridges
DN	Do-Nothing
DoWCoP	Definition of Waste: Code of Practice
DS	Do-Something
ECC	Essex County Council
EIA	Environmental Impact Assessment
ERUB	Engine Run-Up Bay
ES	Environmental Statement

Term	Definition
ETS	Employment and Training Strategy
EU	European Union
EWR	East West Rail
FASI-S	Modernisation of airspace across the South East of England
FIRST	Future LuToN Impact Reduction Scheme for the Three Counties which was consulted on in 2019. It has since been updated to become Community First.
FTG	Fire Training Ground
FWRA	Foundations Works Risk Assessment
FTP	Framework Travel Plan
GCG	Green Controlled Growth
GDP	Gross Domestic Product
GHG	Greenhouse Gases
GVA	Gross Value Added
HAWRAT	Highways Agency Water Risk Assessment Tool
HRA	Habitat Regulation Assessment
HRA NSER	Habitat Regulations Assessment No Significant Effects Report
HS2	High Speed 2
HSE	Health and Safety Executive
ICAO	International Civil Aviation Organisation
LA	Local Authority
LAeq	A-weighted, equivalent continuous sound level
LBC	Luton Borough Council
LBMP	Landscape and Biodiversity Management Plan
LIR	Local Impact Report

Term	Definition
LLAOL	London Luton Airport Operations Limited (the airport operator)
LLP	Luton Local Plan
LOAEL	Lowest Observed Adverse Effect Level
LPA	Local Planning Authority
Luton DART	Luton Direct Air Rail Transport
LVIA	Landscape and Visual Impact Assessment
mppa	Million passengers per annum
MSCP	Multi-Storey Car Park
NAEI	National Atmospheric Emissions Inventory
NATS	National Air Traffic Services
NEDG	Noise Envelope Design Group
NHDC	North Hertfordshire District Council
NMP	Noise Mitigation Plan
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
OBR	Office of Budget Responsibility
OSWMP	Outline Site Waste Management Plan
PC	Prescribed Consultee
PEIR	Preliminary Environmental Information Report
Persons of Restricted Mobility	A physical or mental impairment that has a substantial and long term adverse effect on a person's ability to carry out normal day-to-day activities
PHE	Public Health England
PIL	Persons with Interest in the Land as prescribed under Section 44 of the Planning Act 2008
PINS	Planning Inspectorate

Term	Definition
PPG	Planning Practice Guidance
PRoW	Public Rights of Way
RNAV	Area Navigation
ROA	Remediation Options Appraisal
RPG	Registered Park and Garden
S106	Section 106
SAC	Special Area of Conservation
SAETS	Getting to and from the Airport - Our Emerging Transport Strategy
SAFs	Sustainable Aviation Fuels
SAS	Surface Access Strategy
SIA	Simple Index Approach
SOAEL	Significant Observed Adverse Effect Level
SoCC	Statement of Community Consultation
SSSI	Sites of Special Scientific Interest
SWMP	Site Waste Management Plan
The Act	Planning Act 2008
Proposed Development	A new terminal and associated infrastructure to increase the number of flights and passengers the airport can handle, from 18 to 32 million passengers per annum by the mid-2040s.
T1	Terminal 1, the existing terminal
T2	Terminal 2
TA	Transport Assessment
TP	Travel Plan
WDR	Works Description Report
WHO	World Health Organisation

-
- ⁱ London Luton Airport Limited, 2019, London Luton Airport Vision for Sustainable Growth 2020-2050.
- ⁱⁱ Department for Transport, June 2018, Beyond the horizon: the future of UK Aviation; Making best use of existing runways.
- ⁱⁱⁱ Planning Act, 2008.
- ^{iv} The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended), Schedule 1.
- ^v Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations').
- ^{vi} 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008.
- ^{vii} Compulsory Purchase Act 1965.
- ^{viii} Land Compensation Act 1975.
- ^{ix} Department for Transport, UK Aviation Forecasts, October 2017.
- ^x Department for Transport, June 2018, Beyond the horizon: the future of UK Aviation; Making best use of existing runways.
- ^{xi} Department for Transport, June 2018, Beyond the horizon: the future of UK Aviation; Making best use of existing runways.
- ^{xii} Department for Transport, UK Aviation Forecasts, October 2017.
- ^{xiii} Department for Transport, June 2018, Beyond the horizon: the future of UK Aviation; Making best use of existing runways.
- ^{xiv} Department for Transport, Jet Zero Consultation, A consultation on our strategy for net zero aviation, July 2021.
- ^{xv} Regulation (EU) No 598/2014 of the European Parliament and of the Council of 16 April 2014 on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at Union airports within a Balanced Approach and repealing Directive 2002/30/EC
- ^{xvi} CAP1616: Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information.
- ^{xvii} Department for Transport, June 2018, Beyond the horizon: the future of UK Aviation; Making best use of existing runways.
- ^{xviii} Aviation 2050 The future of UK aviation A consultation, December 2018.
- ^{xix} Control of Pollution Act 1974.
- ^{xx} Department for Transport, June 2018, Beyond the horizon: the future of UK Aviation; Making best use of existing runways.