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LPA ref: 21/00031/VARCON

Appellant: London Luton Airport Operations Ltd

Public Inquiry

Luton And District Association for the Control of Aircraft Noise (LADACAN)

Statement of Case

23 May 2022

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1 Introduction

1. The Government's policy is to limit, and where possible reduce, the number of people in the UK significantly affected by aircraft noise as part of a policy of sharing technical developments and other benefits between industry, communities and all other stakeholders¹, yet by this Application the Appellant seeks to increase noise. Accordingly, LADACAN vehemently opposes the application made under s.73 of the Town and Country Planning Act 1990 for a new planning permission with different conditions from those under planning permission (15/00950/VARCON).
2. This Statement of Case builds on our representations in response to 21/00031/VARCON, along with those of Birketts LLP. We will draw on those, and the additional documents listed in the Annex.
3. The new planning permission would allow 19 million passengers per annum ("mppa") whereas the existing permission limits capacity to 18mppa. The application seeks to vary conditions 8 (Passenger Throughput Cap) and 10 (Noise Contours).²
4. Conditions 8 and 10 were each established for several essential reasons:

*8 Reason: To enable the Local Planning Authority to exercise proper control over the development, in the interests of securing a satisfactory operation of the development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy LP1 of the Luton Local Plan and the National Planning Policy Framework.*³

10 Reason: To safeguard residential amenity. To accord with the objectives of Policy LP1 and LLA1 of the Luton Local Plan and the National Planning Policy Framework.

5. It is our case that these reasons have not changed, and are even stronger today than in 2013 when agreed unanimously by the Development Control Committee, especially given the profligate disregard of the Airport Operator for these essential conditions designed to ensure development accorded with the fundamental policy requirements for protection, balanced growth and mitigation, and sharing the benefits of growth.⁴
6. Despite the high-profile nature of the Airport, planning consideration is straightforward: do the benefits outweigh the harm? In this case, the answer is very simple: they do not. The adverse impact of legitimising and continuing the unlawful and unmitigated breach of noise conditions through premature increase in capacity to reach the throughput limit nine years early⁵ is obvious and must be carefully guarded against. The only 'mitigation' proffered is no

¹ Air Navigation Guidance 2017, airspace noise, paragraph 4.2

² The Application also seeks to amend conditions 22 (Car Parking Management), 24 (Travel Plan) and 28 (Approved Plans and Specifications).

³ John Steel QC Legal Opinion Dec 2013, emphasised in the 12/01400/FUL Planning Meeting

⁴ See Aviation Policy Framework Executive Summary para 5, and body text paras 3.2, 3.12; and 3.13

⁵ See 2012 Revised Masterplan Sep 2012 sections 9.10 and 9.11; LLA RNAV consultation extract Apr 2014

such thing⁶. The *only* acceptable passenger cap agreed in 2013/14 for Project Curium was 18mppa⁷, and there is no reason to disturb that finding.

2 Legal and Policy Framework

7. Under s.70(2)(a) of the Town and Country Planning Act 1990, an LPA must have regard to the Local Development Plan when granting or declining planning permission. S.73 of the TCPA allows for an application for a new planning permission with different conditions.⁸ S.38(6) of the Planning and Compulsory Purchase Act 2004 provides:

*(6) If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination **must be made in accordance with the plan unless material considerations indicate otherwise.***⁹

8. With regards to the policy framework, all relevant policies acknowledge the benefits of airports maximising their existing capacity where *need has been demonstrated*.¹⁰
9. In addition, Local Plan policy LLP6 which concerns Luton Airport requires development to be in accordance with the Airport Master Plan. The 2012 Masterplan did not anticipate an increase in passenger numbers to 19mppa before 2031.¹¹ A new Master Plan¹² (MP19m) was adopted by the LPA Executive only a week before the 21/00031/VARCON Planning Meeting with no explanation as to why the extant Masterplan was out of date. As the meeting notes show¹³, the proposal was subject to barely any analysis and it is unsurprising that MP19m contains fundamental errors: it states the 2012 planning application was to ‘increase capacity to 18 million passengers per year by 2020’ (in contradiction to the 2012 Masterplan and para 80 of 5.7 DMC Item 7 London Luton Airport (Officer’s Report)); it adopts the current noise planning conditions 9-12 and 2019 Noise Action Plan (yet Condition 10 has been breached and this Application seeks to increase the contours, and the 2019 Noise Action Plan claimed compliance with contours while in breach¹⁴). Yet its environmental commitments were relied on when Members adopted it with remarkable haste¹⁵. Consequently, we respectfully request the Inspector to disregard MP19m when determining the current Application.
10. Moreover, every national and local policy concerning the airport are all clear that any ‘benefits’ must be weighed against the impacts and particular weight should be given to the impact on amenity in terms of noise:

⁶ See 5.6 DMC Amendment Sheet Nov 2021, para 129

⁷ 12-01400-FUL Decision notice 601554 Condition 10 (as then numbered); John Steel QC Opinion Dec 2013

⁸ This is sometimes erroneously referred to as an application to ‘vary’ conditions.

⁹ In the draft Levelling-up and Regeneration Bill, any departure from the development plan will require ‘strong’ indication otherwise.

¹⁰ Beyond the horizon Jun 2018, paragraph 1.29 requiring economic and environmental impacts to be weighed

¹¹ See paragraph 198 of the Officers’ Report

¹² Master Plan 19 mppa, London Luton Airport, Jan 2021

¹³ MP19m Decision Sheet Nov 2021, MP19m Impact Assessment Nov 2021, MP19m Officers Report Nov 2021

¹⁴ LLA Noise Action Plan 2019-2023, section 3 item 3.4 says ‘We will operate within our agreed contour area limits.’

¹⁵ LBC Exec MP19m adoption transcript 23 Nov 2021

- a. The Aviation Policy Framework (2013) (APF) states at paragraph 3.24 ‘the acceptability of any growth in aviation depends to a large extent on the industry *tackling* its noise impact’ (i.e. reducing and eliminating it). Moreover, improvements in aircraft are not to be used as a means of increasing capacity without reducing noise. The APF states at paragraph 3.3 ‘the industry *must* continue to *reduce and mitigate* noise as airport capacity grows. As noise levels fall with technology improvements the aviation industry should be expected to *share the benefits* from these improvements’ At paragraph 3.28, the APF requires applicants ‘to consider new and innovative approaches such as noise envelopes or provision of respite for communities already affected’ when increasing capacity.
- b. Beyond the horizon – The Future of UK Aviation: Making Best Use of Existing Runways (2018) states that ‘the adverse impacts such as noise are mitigated where possible’ (paragraph 1.22)
- c. Paragraph 185a of the National Planning Policy Framework (NPPF) provides that development ‘mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.’
- d. The Noise Policy Statement for England (NPSE) provides that ‘significant adverse effects on health and quality of life should be avoided’¹⁶ and that developments should ‘mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise’¹⁷.
- e. The PPG is clear that noise can override other concerns.¹⁸ The PPG is also clear that any noise assessment cannot be reduced to one metric and the number and frequency of occurrences, duration, character and time of day are also relevant.¹⁹ Moreover, the PPG acknowledges that noise compromises tranquillity and the enjoyment of gardens.²⁰ In addition, the PPG acknowledges that low altitude flying exacerbates noise and that mitigation may be required.²¹ Finally, the PPG introduces the concept of Unacceptable Adverse Effect which must be prevented (noise exposure hierarchy).
- f. Local Policy LLP38 (Pollution and Contamination) requires ‘appropriate mitigation if significant adverse impacts are identified’.

11. The Policy considerations relating to noise were neatly summarised in Appeal Decision 3256619 concerning the increase in ‘throughput’ at London Stansted Airport.²²

33. The overarching requirements of national policy, as set out in the National Planning Policy Framework (the Framework) and the Noise Policy Statement

¹⁶ Whilst also taking into account the guiding principles of sustainable development.

¹⁷ *Ibid.*

¹⁸ Paragraph reference ID: 30-002-20190722 - 002

¹⁹ Paragraph reference ID: 30-004-20190722 – 004, 005 and 006 for example

²⁰ Paragraph reference ID: 30-004-20190722 – 008 and 011

²¹ Paragraph reference ID: 30-004-20190722 - 012

²² Inspectors Michael Boniface MSc MRTPI, G D Jones BSc(Hons) DipTP MRTPI and Nick Palmer BA (Hons) BPI MRTPI

for England (NPSE), are that adverse impacts from noise from new development should be mitigated and reduced to a minimum and that significant adverse impacts on health and quality of life should be avoided. It is a requirement of the NPSE that, where possible, health and quality of life are improved through effective management and control of noise.

34. The APF states that the overall policy is to limit and, where possible, reduce the number of people significantly affected by aircraft noise. The APF expects the aviation industry to continue to reduce and mitigate noise as airport capacity grows and that as noise levels fall with technology improvements the benefits are shared between the industry and local communities.

3 History of Non-Compliance with existing Conditions

12. What is particularly unusual about Luton Airport is that the Local Planning Authority (“LPA”) owns it via its wholly owned Airport Company; there is therefore a theoretical conflict of interest when it comes to enforcement and, regrettably, an actual financial involvement in inducing growth without any provision for restraint²³.
13. The airport’s record at respecting conditions has been abysmal: the night-time contour was breached in 2017, 2018 and 2019, and the daytime contour breached and passenger cap reached in 2019. But for the pandemic, noise breaches were forecast to continue²⁴, with no indication given on how the passenger limit would be respected. Despite these repeated and sustained breaches, the LPA only required an ‘Action Plan’²⁵ which clearly failed, but no enforcement action has been taken despite its policy²⁶ or, apparently, its failure to scrutinise²⁷. We will provide evidence in detail regarding the repeated failure of the Airport Operator to respect conditions and the LPA failure properly to enforce those conditions.
14. The Appellant was obligated by S106 to control growth from 2014 in accordance with planning conditions. It has the power to do so via a controlled release of capacity²⁸; its noise consultant Bickerdike Allen Partnership (BAP) produces noise contours given relevant data or forecasts for past or future periods, and can explain the causes of contour expansion²⁹. The Appellant’s apparently inadequate internal communication³⁰; failure to manage growth within permitted contours; and failure to rectify the breach³¹, evidence the its lax attitude to capacity management and adhering to conditions despite its obligations³². Significantly, it seeks to

²³ See for example Deed of Variation Aug 2017; LLAL Accounts 2016 p16 Section 5 para 3; LBC Officer LGC Article Apr 2018; Eml LBC Cllr to LADACAN member May 2019; LBC-LLAL Officer Linked-In Page as at Feb 2020

²⁴ Officers’ Report, paragraph 186; LLA AMR 2019 p35

²⁵ Letter LBC to LLAOL Feb 2018

²⁶ LBC Enforcement Policy Dec 2015

²⁷ S106 PDF p18-19, 40, 99, 106-7; Eml LBC to LADACAN re Luton Airport scrutiny committee Feb 2019

²⁸ Worldwide Slot Guidelines Apr 2020, see procedures and Slot Controller obligations for a Level 3 Airport

²⁹ See for example LLA AMRs 2016-2019; the ES; BAP report on Condition 10 Variation Aug 2019; BAP noise contour report Nov 2016; LBC Response to Andrew Lambourne May 2020

³⁰ 1.7 Planning Statement 4.3.27

³¹ Ltr LBC to LLAOL re Breach Nov 2019

³² See for example ref 11 above to NAP; LLAOL Environment Policy 2015 (incorporated in S106 on PDF p247)

excuse this by reference the influence of the LPA's Airport Company³³. Such management influence, we note, contravenes S17 of the Airports Act 1986³⁴.

15. In reality there appears to be little political will to enforce the existing conditions and yet this application provides no consideration as to how they could be strengthened e.g. by:
- a bond payment on non-performance
 - independent oversight of the airport's slot control process
 - thresholds below the contour limits which trigger mandatory action if exceeded
 - granting other affected Local Authorities relevant control powers
16. Given the foregoing, and the woeful record of enforcement despite the commitments in the LPA's Enforcement Policy³⁵, the Inspector will respectfully be invited to weigh the practical enforceability of any new conditions and the prospect of such conditions being respected and enforced.
17. In light of its persistent and foreseeable breaches, we will argue that the Appellant must demonstrate that it has the management will and capability to ensure it abides by its existing noise and capacity conditions before any further permission is granted which is wholly dependent upon such conditions being respected.

4 The Proposals

4.1 Additional passengers and flights

18. The proposals would allow for an increase in passenger 'throughput' at Luton from 18mppa to 19mppa and relaxation of the noise contours to permit this to be delivered with the current part-modernised fleet. This has already resulted in some 35 extra flights a day during the period of non-permitted development³⁶, whereas the Appellant highlights just three extra flights per day at the end of the proposed fleet evolution.

4.2 Purported Benefits

19. The Application simply does not demonstrate 'need' for this expansion. Demand is not the same as need and we will present evidence on the substantial gaps in the Appellant's case.

4.3 Noise Impacts

20. We will argue that the Environmental Statement (ES) is defective and therefore there can be no clarity or certainty about the scale of impacts, and that the forecasts and noise model on which the contours are based do not stand up to scrutiny. Specifically, we will present evidence which demonstrates that:

³³ Ltr LLAOL to LBC re Breach Dec 2019

³⁴ See Airports Act 1986 S17 as amended, and HoC Lib SN00323 Regional Airports Apr 2022 p15

³⁵ LBC Enforcement Policy Dec 2015

³⁶ See LLA briefing to NTSC on C10 variation Sep 2018, and BAP report on Condition 10 Variation Aug 2019

- a. the 'baseline' used to measure the increase in noise is opaque and unclear; a number of ES comparisons are made to 2019 (a year of non-permitted development) and we will argue that the impact assessment is understated;
- b. the metrics used to assess noise impacts are narrow in scope and fail to take into account the impact of intermittent and unpredictable noise as opposed to mere 'average' impacts;
- c. the spot-level noise predictions in the ES for various aircraft types and locations differ significantly from the Appellant's noise measurements;
- d. no evidence is provided to give full confidence in the noise model calibration³⁷, but the response to a technical query³⁸ shows how sensitive it is to parameters;
- e. the fleet projections contain inconsistencies when compared to publicly available information; and
- f. the ES does not meet policy requirements to explore options to resolve the issue, such as adequate operating restrictions³⁹, or respite.

21. Despite the questionable data upon which the ES impact assessment is based, even the Appellant accepts that the development will have adverse impacts.⁴⁰

- a. With regards to night-time levels, 724 additional dwellings will experience noise that passes SOAEL (Significant Observed Adverse Effect Level).
- b. A further 144 properties will experience a further increase in night-time noise despite already having noise impacts above SOAEL
- c. 1,877 dwellings will experience a material increase in noise during the day which is likely to be of significant effect.⁴¹

In short, the impact of increasing the number of passengers will result in noise impacts that are severe, legion and wide-ranging. This is before account is taken of the opaque analysis and questionable comparisons in the ES. However, sight should not be lost of what anodyne acronyms such as SOAEL fail to convey: the disturbance and harms caused by aviation noise. For example, there are numerous studies regarding the health impacts of interrupted sleep and these will be raised by us in evidence.

22. Any projection provided by the Appellant and endorsed by the LPA must be treated with substantial scepticism given the unreliability of many previous statements, projections and

³⁷ An example of such evidence is given in LR 32m Appendix 16.1 Noise Feb 2022 p65-86

³⁸ LBC Response to Andrew Lambourne May 2020

³⁹ The APF fully recognises and describes the ICAO balanced approach in para 3.7; see also paras 3.26 and 3.28

⁴⁰ Figures taken from the Officers' Report for the worst year noted in the Environmental Statement, i.e. 2022

⁴¹ Paragraph 121 of the Officers' Report

undertakings, as we shall show.⁴² Accordingly, the noise impact of the scheme is likely to be substantially greater than that contained in the ES.

23. Given even this acknowledged level of impact is severe, the developers are left with no choice but to offer ‘mitigation’ in the form of noise insulation. The Noise Insulation Scheme from the previous proposal has been tweaked, and in a few cases accelerated. However, in truth it is not truly mitigation since it does not cover all properties that will receive adverse impacts in time. This is reflected in Luton’s Officers’ Report at paragraph 129:

it is recognised that the roll out of the programme is such that not all dwellings that will experience adverse noise impacts will be able to be insulated prior to those impacts occurring, consequently it is considered that the measures proposed are compensation rather than mitigation.

24. Regardless of the programme’s acknowledged shortcomings, noise insulation does not offer full protection, particularly if trickle vents are installed to avoid bulky wall-mounted units. The budget provided per home is grossly inadequate to achieve full protection; noise insulation offers no protection to someone outside in the garden or on a balcony. It can create further problems through having to keep the windows closed at night, as highlighted by independent review⁴³, which will be explored by us before the Inquiry. In any case, the Scheme⁴⁴ only applies to those living closest to the airport, which does not relieve the burden on others still affected by very noisy low-flying aircraft.
25. Finally, the Appellant has failed to discharge its obligation under APF paragraph 3.28 to consider alternatives that would have less impact on residents or provide truly adequate compensation and mitigation.
26. In short, we will argue that the proposed ‘mitigation’ is not even compensation as it does not fully mitigate the impacts and creates additional problems. The fact that Luton Airport’s noise is inadequately mitigated is demonstrated by the widespread concern that has been expressed in the overwhelming public rejection of this application and of its predecessor 19/00428/EIA which also sought to relax Condition 10.

4.4 Other Matters

27. In addition, we will demonstrate that the assumptions regarding modal shift between public and private transport are misplaced. This will have an impact in relation to air quality, transport noise and transport assessments.

⁴² For example the “upper end” trajectory in the 2012 Masterplan and 2014 RNAV consultation; the commitment to abide by the noise contour limits made in the 2019 Noise Action Plan; a failed objective of achieving 10,000ft by the railway line between Harpenden and St Albans; noise monitoring errors in CAP1882 Luton PIR p40-43

⁴³ For example ICCAN Noise Insulation Review Mar 2021

⁴⁴ LLAOL Noise Insulation Scheme document

5 Planning Balance

28. The development is acknowledged to be a departure from the Local Development Plan.⁴⁵ Given the statutory presumption in favour of the Local Development Plan this development ought to be declined. Moreover, the draft Levelling-up and Regeneration Bill give further primacy to the Local Development Plan by proposing that any departure requires ‘strong’ material considerations. This provides insight into the weight that the Secretary of State places on the importance of a ‘genuinely plan led’ planning system (NPPF paragraph 15).
29. The departure from the development plan is extreme:
- a. LLP6 B(iii) specifically requires that development is in accordance with an up to date masterplan. We invite the inspector to discount the new masterplan—it was rushed through with scant scrutiny and was based on erroneous data and only a week before the relevant planning meeting. The importance of a *genuine* masterplan and this policy is obvious—it is intended to prevent the piecemeal and salami slicing that is characteristic of this proposal. A *genuine* masterplan is critical to ensuring that the impact of development is fully considered and approached holistically rather than letting the airport grow unchecked.
 - b. Policies LLP6 B(iv) is clear that any further development will achieve *further noise reduction or no material increase*. This development increases the noise and therefore makes it harder to achieve the first element, ‘noise reduction’.
 - c. Policy LLP38 requires mitigation (it is not optional). As the Local Planning Authority acknowledge there is no mitigation, just partial compensation. Moreover, for the reasons given, the proposed mitigation creates more problems than it purportedly solves and there are many situations and locations where there is no mitigation (e.g. outside in gardens and on balconies, or more distant).
30. With regards to policy LLP38, the Officer’s Report perversely discounts the observations made by the LPA’s own Environmental Protection Unit who apply the LPA’s Planning and Noise Guidance. Remarkably the officer discounts these observations on the basis that there would be no breach of statutory nuisance. This is a planning application not an application for breach of the Environmental Protection Act 1990. Accordingly, there is no reason to dismiss the guidance provided by the council’s own specialists.
31. In addition, there are breaches of national policies due to the inadequate mitigation, and inequitable distribution of the benefits of the A321neo aircraft—the airport and airlines are banking those for their own commercial advantage. These breaches of policy occur *even if the applicant’s evidence is accepted as accurate*. In actuality, they have downplayed and minimised the impact and therefore the breaches are likely to be more severe.
32. The justification put forward for such an extreme departure is inadequate:
- a. There is no evidence demonstrating the specific need for this development.

⁴⁵ Paragraphs 193 of the Officer’s Report

- b. The LPA places repeated weight on the support in policy for expansion on the basis of the economic benefits; however, any such support in policy is contingent upon the adverse impacts being acceptable. For the reasons discussed above, these are not in any way acceptable but severe, legion and underestimated. Therefore, there is no support for the development in policy.
 - c. On the benefits of the scheme the LPA is confused; the Officer's Report states (at paragraph 216) that the purported attenuation in noise levels weighs in favour of the scheme—this is not a benefit, this merely (disputed) evidence that the impact can be mitigated or downplayed.
33. The development is only palatable if subject to conditions. However, for the reasons discussed above the Inspector can have no confidence that conditions will be respected (the breaches were avoidable; the airport has not delivered an Action Plan capable of addressing them). The original breach, caused by over-rapid growth before mitigation of the fleet⁴⁶ cannot have been helped by the Incentivisation Scheme, nor an apparent lack of the scrutiny⁴⁷ required by the Section 106 Agreement⁴⁸. Accordingly, in the absence of effective, reasonable and workable conditions, scrutiny or control, permission should be refused on that basis alone.
34. Since the development is an egregious departure from the development plan, with no support in the policies, and since the Inspector can have no confidence that conditions will actually be enforced, we will invite the Inspector to refuse permission.
35. LADACAN reserve the option (with the Inspector's consent) of submitting a supplemental statement in response to any points raised in the LPA's and applicant's Statement of Case. Additional documents will be referenced in our Proofs of Evidence.

⁴⁶ BAP report on Condition 10 Variation Aug 2019

⁴⁷ Email LBC to LADACAN re Scrutiny Committee Feb 2019

⁴⁸ See reference 24 above

6 Annex

Documents we have referenced are listed alphabetically below where not in the LPA bundle:

LAD-01	12-01400-FUL Decision notice 601554.pdf
LAD-02	Air Navigation Guidance 2017
LAD-03	Airports Act 1986 S17 as amended.pdf
LAD-04	Airports National Policy Statement Jun 2018.pdf
LAD-05	Aviation Policy Framework.pdf
LAD-06	BAP contouring methodology update Aug 2015.pdf
LAD-07	BAP noise contour report Nov 2016.pdf
LAD-08	BAP report on Condition 10 Variation Aug 2019.pdf
LAD-09	Beyond the horizon Jun 2018.pdf
LAD-10	CAP 1129 Noise Envelopes.pdf
LAD-11	CAP1882 Luton PIR.pdf
LAD-12	Deed of Variation Aug 2017.pdf
LAD-13	Eml LBC Cllr to LADACAN member May 2019.pdf
LAD-14	Eml LBC to LADACAN re Luton Airport scrutiny committee Feb 2019.pdf
LAD-15	HoC Lib 9062 Airport slots Nov 2020.pdf
LAD-16	HoC Lib SN00323 Regional Airports Apr 2022.pdf
LAD-17	ICCAN Noise Insulation Review Mar 2021
LAD-18	John Steel QC Legal Opinion Dec 2013.pdf
LAD-19	LBC EnforcementPolicy.pdf
LAD-20	LBC Officer LGC Article Apr 2018.pdf
LAD-21	LBC Response to Andrew Lambourne May 2020.pdf
LAD-22	LBC-LLAL Officer Linked-In Page as at Feb 2020.pdf
LAD-23	LLA AMR 2016.pdf
LAD-24	LLA AMR 2017.pdf
LAD-25	LLA AMR 2018.pdf

LAD-26	LLA AMR 2019.pdf
LAD-27	LLA briefing to NTSC on C10 variation Sep 2018.pdf
LAD-28	LLA Noise Insulation Scheme.pdf
LAD-29	LLA RNAV consultation extract Apr 2014.pdf
LAD-30	LLACC meeting 2013.pdf
LAD-31	LLAL Accounts 2016.pdf
LAD-32	LR 32m Appendix 16.1 Noise Feb 2022.pdf
LAD-33	Ltr LBC to LLAOL re Breach Feb 2018.pdf
LAD-34	Ltr LBC to LLAOL re Breach Nov 2019.pdf
LAD-35	Ltr LLA re Noise restrictions Feb 2018.pdf
LAD-36	Ltr LLAOL to LBC re Breach Dec 2019.pdf
LAD-37	Masterplan Sep 2012.pdf
LAD-38	MP19m Adoption Transcript 23 Nov 2021.pdf
LAD-39	MP19m Decision Sheet Nov 2021.pdf
LAD-40	MP19m Impact Assessment Nov 2021.pdf
LAD-41	MP19m Officers Report Nov 2021.pdf
LAD-42	S106 VARCON LEGAL AGREEMENT 690622 Oct 2017.pdf
LAD-43	Worldwide Slot Guidelines Apr 2020.pdf