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Reference: LTN/DCO/DGu1

Dear Sir/Madam,

**Re: Future LuToN Non Statutory Consultation (July-August 2018)**

I am writing on behalf of Luton Borough Council as Local Planning Authority in response to the consultation that took place this summer and apologise for the delay in providing comments.

As you are aware the local planning authority has the responsibility for local planning policy covering the area within which Luton Airport is located and also determines planning applications at the airport.


In addition to the consultation document I have reviewed other information that was available through London Luton Airport Limited's (LLAL) website, [www.futureluton.llal.org.uk](http://www.futureluton.llal.org.uk), including the Draft Sustainability Strategy and the draft Sift 1 and Sift 2 reports. This information is referred to where appropriate. My comments are as follows:

**Underlying Assumptions re Demand**

In 2009 the Committee on Climate Change published its report on 'Meeting the UK aviation target – options for reducing emissions to 2050.' This report considered that demand growth of around 60% in total UK passenger numbers would be compatible with keeping CO<sub>2</sub> emissions in 2050 to 2005 levels (limited to 37.5 million tonnes of CO<sub>2</sub> in 2050) and the recommendation was included within the Airports Commission's analysis and recommendations. This would equate to around 370 million passengers per annum (mppa) by 2050, compared to 230mppa in 2005 (note in 2016 the UK's airports handled 268mppa). The Airports National Policy Statement (Airports NPS) recognises that the Government has a number of international and domestic obligations to limit carbon emissions (paragraph 5.69) and notes that the Airports NPS does not override these objectives.

The Airports NPS sets out the Government's policy on the need for new airport capacity in the south-east and provides the primary basis for decision making on a new runway at Heathrow, however it is somewhat silent on the cumulative impacts

**Luton**



of airport infrastructure development in the UK. The Government's Aviation Strategy: Beyond the Horizon – The Future of UK Aviation, included the assumption that through making best use of existing runways there would be a likely increase in air transport movements (ATMs) of 2%, without Heathrow expansion (paragraph 1.28). However, the Future LuToN consultation provides for a 78% increase (from 135,000 ATMs to 240,000 ATMs).

The Future LuToN development needs to be considered in the light of other major airport developments that are proposed for the south-east and to understand how the proposals together impact upon Government commitments and obligations. Thus, it is anticipated that a third runway at Heathrow will result in 730,000 ATMs – an increase of 52% above the current 480,000 cap – and 130mppa (an increase of 67% above the 78mppa passing through the airport currently). Stansted currently has a planning application to increase the number of passengers from their 35mppa cap to 43mppa (note they are currently operating at 27mppa and consequently the increase represents a 59% increase on the current situation [23% on their cap]), though they do not propose to change the number of ATMs (capped at 274,000). It is also understood that Gatwick propose to pursue their expansion proposals, making use of the northern (emergency) runway to increase the number of ATMs and passenger capacity (though not to the 95mppa anticipated in their bid to the Airports Commission for a full second runway).

### **Chapter 03: Future LuToN**

Whilst the section entitled 'Government Policy and Aviation Strategy' is correct in saying that the Government's Aviation Strategy "is supportive of UK airports making best use of their existing runways" (page 20), there is an important caveat within the Aviation Strategy, namely that this is "subject to environmental issues being addressed" (page 3 paragraph 1.5). I recognise that chapter 5 considers 'Managing the Impacts', however, it would be appropriate to highlight these at the outset and not present only a partial picture.


The Government's Aviation Strategy lists the main environmental issues, as identified in the call for evidence, namely:

- Noise
- Air quality
- Surface access
- Carbon emissions

The Aviation Strategy makes clear that the first three are local environmental issues and that "the government expects these to be taken into account as part of existing local planning application processes" (page 8 paragraph 1.23).

Whilst I appreciate that the proposal to increase the passenger throughput to between 36 and 38 mppa would mean that the proposal would be considered to be a Nationally Significant Infrastructure Project (NSIP) and so be determined by the Planning Inspectorate through a DCO, it is important that these local issues should be addressed head on, and this first section should have properly reflected the position as set out in the Aviation Strategy.

This chapter includes information on the wider economic benefits, including the employment benefits with a projection of 800 jobs created per additional million passengers. Given that the airport has recently grown from 10 million passengers to 16 million passengers, it should be possible to provide a more detailed rationale



for the projections of the economic and employment benefits to be provided based on the recent experience. Note that different figures have been used at different airports (including a report prepared by York Aviation for the Airport Operators Association in 2005) which have had much lower figures. Additionally, the Project Curium application assumed that for an additional 5.4mppa there would be 2,300 new direct jobs, equating to 426 jobs per million passengers (it should be possible to verify how accurate these projections have proved to be).

The chapter also includes reference to LLAL's Draft Sustainability Strategy which includes three key aims, one of which is to be a better neighbour by improving the potential direct impacts of noise and air quality on the local community. The airport operator (LLAOL) is currently in breach of the noise condition associated with the permission to increase to 18mppa, and is about to submit an application to vary that condition to allow a larger area to be covered by the 57dB LAeq day time contour and the 48dB LAeq night time contour. The DCO will need to address how many more people will fall within these contours should the airport increase to 30mppa by 2035 and 38mppa by 2042 and set out appropriate mitigation to minimise the impact of noise on the surrounding communities.

Additionally in terms of noise the proposed development will need to consider the implications for night flights, particularly given the sensitivity to local communities and the current planning conditions limiting the numbers and type of aircraft. The assumptions will need to be clearly set out, including the fleet mix with the numbers of re-engined aircraft (such as the Airbus A320neo and the Boeing 737max) at different phases of the development. A worst case and best case scenario will need to be presented.


Since the Future LuToN consultation finished the WHO have published their 'Environmental Noise Guidelines for the European Region' which included recommendations in relation to average noise exposure levels and night exposure noise levels to reduce the health effects on the populations around airports. The implications of the WHO guidelines will need to be considered, particularly as the Government signalled in its Consultation Response on UK Airspace Policy in 2017 that it would adopt the risk based approach proposed in the consultation consistent with current guidance from the WHO. Although this response related to airspace decisions, the direction of travel appears to be towards new metrics to assess noise impacts on the health and quality of life of those affected by noise from aviation. Greater clarity may be provided when the Government publishes its Aviation Strategy.

The airport operator recently produced the new Airport Surface Access Strategy 2018-2022 (ASAS) with measures to reduce the use of private cars, control parking demand, and restrict the impact of inconsiderate parking on the surrounding community. The DCO will need to make reference to the ASAS and set out the steps that will be necessary to mitigate the impacts of an increase to 36/38mppa.

#### **Chapter 04: Considering the Options**

In order to inform the initial identification of options and the demand for additional infrastructure, the capacity of the existing terminal and associated facilities should be set out.

The DCO process requires robust evidence to demonstrate a range of options and the potential impacts have been fully considered. Clearly the "do nothing" option will have to be assessed to determine what capacity is available with the existing



facilities at the airport, taking into account constraints such as: stands; taxiways; border control; check-in desks; baggage handling; circulation space; and surface access.

It is not clear from the document how the figure of 240,000 ATMs was arrived at, but is assumed that this fits with the figure provided in the Air Transport White Paper 2003 (now withdrawn). However, the Air Transport White Paper only referred to the potential for 30mppa making use of the single runway at Luton, so the assumptions on type of aircraft, load factors and runway utilisation will need to be set out.

This chapter also includes mention in the Sift process to the development of a master plan. Policy LLP6 of the adopted Luton Local Plan 2017, covering the strategic allocation at Luton Airport, states that airport expansion proposals will only be supported where, amongst other things, they “are in accordance with an up to date Airport Master Plan.” Whilst the Future LuToN proposal will be an NSIP I consider that it is important that a master plan for the airport is prepared, especially as the previous master plan was prepared in 2012, only envisaged an increase to 18mppa and was never formally adopted by the local planning authority. The master plan will inform the baseline position, set out the aspirations for the airport operator as to how the airport might grow in the next ten years, and may indicate that a less ambitious proposal is required than that currently considered in the Sift process.


Subject to the caveat above, Option 1a in the Sift analysis quite rightly appears to be the preferred option given the assessment of the beneficial versus adverse impacts of all options considered. However, if this option is to be developed as the preferred option for the next phase of consultation, it will be necessary to understand the capacity of the existing airport infrastructure and whether alterations to the existing terminal, stands and taxiways could increase throughput (both in terms of passenger numbers and ATMs), with less of a requirement for land take and less impact upon the communities to the north of the airport.

It would also be necessary to understand how the DCO might affect the New Century Park development, should that scheme receive planning permission (at this stage no decision has been made on the planning application for New Century Park).

## **Chapter 05: Managing the Impacts and Chapter 06: Next Steps**

The Future LuToN consultation has identified the major predicted impacts associated with the development as:

- Earthworks
- Public open space
- Surface access
- Noise
- Flightpaths
- Air quality
- Landscape and visual
- Heritage
- Biodiversity
- Climate change and
- Land acquisition



It is considered that these are appropriate areas for assessment subject to the provisos set out below.

Within the chapter there does not appear to be mention in the enabling works section of the need for any construction workers compounds, whilst issues such as night working and percussive piling will also need to be addressed fully (both of which have been issues with the Project Curium development). Further there should be consideration of the impact upon community (public open space is detailed, but other effects on people, homes and community facilities could arise). I assume that within the landscape and visual assessment there will be consideration of light pollution and its impact on the open countryside and neighbouring communities. Drainage issues will also need consideration (there is reference in the sections covering climate change and enabling works to sustainable drainage systems and surface water drainage), setting out measures to prevent contamination of the strategic aquifer, licences associated with the current outfall, discharge rates and capacity of the existing surface water and foul drainage systems and provision for increased capacity at Thame Water's sewage treatment works at East Hyde (or other alternative means of treatment and disposal, such as for runoff that has been in contact with glycol de-icing fluid).

Chapter 6 includes a section entitled 'Other Assessments' and it is assumed that the EIA will therefore also include a chapter on economics and employment (covered in chapter 3 of the consultation document and the subject of 'Socio-economics' is referred to in the additional assessments), as well as a Health Impact Assessment (presumably covered by the subject 'Health and community') as well as a Waste Impact Assessment (again the subject of 'Waste and resources' probably covers this).

There appears to be no reference in the consultation document to an assessment of the cumulative effects of the development. Obviously your EIA coordinator will be aware of this requirement and will ensure that it takes on board the scheme wide cumulative effects of the development, together with significant cumulative effects from other existing and/or proposed developments that may combine or interact with the DCO proposals.

Whilst the document includes reference to flight paths, I have not chosen to comment on this aspect of the development, since I am aware that LLAOL is currently liaising with NATS and the CAA in relation to future airspace changes. Whilst the detailed flightpaths will be considered as part of the Airspace Change Process, new flightpaths could have a significant adverse impact on the health and wellbeing of the local community. Minimising the impact of noise on large populations should be an important consideration in the preparation of the EIA, though I am aware that other authorities will wish to minimise the impact upon populations not previously overflown.

Whilst these comments are late, I hope that they are helpful and trust that you will be able to take them on board as you seek to develop any proposal.

Yours sincerely

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Planning Consultant to Luton Borough Council (airport related development)

**Luton**