

## Environment and Commercial Services

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Contact: Marny Moruzzi  
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Date: 12 October 2012

**Contact from 15 Oct 2012:**  
**Chris Bearton 01992 556309**

Dear Sir/Madam,

### **London Luton Airport, Revised Masterplan**

Thank you for the opportunity to comment on the third draft masterplan to have emerged relating to London Luton airport in the space of 10 months.

The County Council has responded to the two previous separate draft masterplan pre-application consultations by LLAL and LLAOL. Given that this current draft masterplan proposes the same broad scale of growth of the airport, its position remains the same. The County Council remains concerned that detailed evidence by way of justification and impacts is not available to consultees as part of this pre-application consultation. The consequence of this is that, whilst forewarning interested parties that a planning application is to be submitted, the consultation potentially achieves very little else of any worth other than to relay plans already finalised. Given this, the County Council reserves its position on all matters.

### **Government Policy**

The current Government has yet to finalise its policy on any increase in capacity at airports throughout the country and particularly within the context of LLA, the south east of England. The Government's position on potential capacity growth at LLA within this wider context will be uncertain for some time. The County Council is of the view that it would be far more preferable to consider any planning application at LLA within the context of a completed Government national review of aviation policy and any locational guidance that it might contain.

### **The scale of additional capacity facilitated by the proposals**

Section 23 of the Planning Act 2008 designates the type and scale of airport-related infrastructure projects which are to be construed as nationally significant. The

designation covers the construction of new airports or alterations to existing ones and circumstances where there is an increase in permitted capacity or increases in capacity capability. The position at LLA is one of alteration to an existing airport at which capacity capability applies, as there is no restriction on throughput within the existing planning consent. Subsections (1), (4) and (5) of section 23 of the Planning Act 2008 therefore apply. Any application would fall to be determined by the Major Infrastructure Projects Unit (MIPU, replacing the Infrastructure Planning Commission) if it would 'increase by at least 10 million per year the number of passengers for whom the airport is **capable** of providing air passenger transport services.....' [emphasis added]. The consultation material contains no information about the current theoretical capacity of the airport, though from a presentation given to the County Council by LLAL during its draft masterplan consultation it is understood that the airport is beginning to struggle with the throughput experienced in 2008 of 10.3mppa. At para 4.14 the current draft masterplan consultation document states the following:

*'4.14 .....While the runway could, in theory accommodate a larger airport than we plan, this could not be delivered within the existing airport boundaries in a manner that would provide a satisfactory level of customer service.'*

So the runway improvements proposed would appear to facilitate capacity enhancement to in excess of 18mppa - potentially and likely to a level that would exceed the 10mppa threshold above which any application would need to be submitted to and determined by the MIU. Were the airport ultimately to handle that kind of capacity the document does not state that it would be impossible for the remainder of the airport facilities to cater for that capacity - it states that it would raise customer service issues. With the information currently available it is not clear whether:

- the current or any future operator might operate the airport at the full capacity of the runway but at the expense of customer service.
- customer service issues might be overcome by exercising permitted development rights.
- customer service issues would not arise if the capacity in the runway were to be utilising off peak periods at a greater rate than forecast in the document.

In advance of any planning application the County Council remains of the view that there needs to be an agreed position between the applicant and the two potential determining authorities on the correct procedure to be followed. In addition, the planning application should contain comprehensive capacity intelligence on the potential current throughput of the airport and that which would be facilitated by the proposal.

## **Noise**

The noise restrictions placed on the airport are contained within a 1998 planning consent granted within the context of a planning application for growth to 5mppa when older aircraft were far noisier than modern equivalents. Nevertheless, there has been a steady annual rise in noise due to the shift towards heavier aircraft and more frequent air traffic movements.

In terms of night noise Heathrow, Gatwick and Stansted all have strict night noise controls with Government setting limits on noise and movements numbers. London City has a night and weekend curfew. There are no such limits upon LLA and the County Council has consistently called for stringent limits on night flights to be introduced in both the

short and long term to protect the local environment and provide people with certainty and called for these to reflect those imposed by Government at the three major south east airports.

In addition, public and community expectations surrounding acceptable exposure to aircraft-related noise pollution will have changed substantially since the 1990s. The airport is subject to a dated planning consent with noise restrictions which fall below expectations one would expect at a modern, progressive and responsible airport. Any planning application should be treated by the applicant as a major opportunity to seek significant improvements and mitigation to the noise impact environment created by the airport.

It is encouraging that the Masterplan document, sets out a range of supplementary proposals (in addition to the approved Noise Action Plan) to mitigate the additional noise impacts from the proposal. However, in line with best practice and the EIA regulations, the County Council will expect the forthcoming planning application, to contain a comprehensive analysis of the future noise implications of the growth proposals and be proactive in coming forward with positive proposals for improvements and mitigation (these should include proposals imposing night flight limitations consistent with those at Heathrow, Gatwick and Stansted. Limitations would also be expected to be imposed through a Government body, independent of the airport owner or operator, to ensure environmental concerns are not biased by and/or offset by commercial gains). This should be undertaken as part of the EIA and set out in the Environmental Statement). As part of this process, the methodology used to undertake an assessment of noise should be agreed by relevant stakeholders through the EIA Scoping Opinion – of which the County Council are yet to see as part of this application. At this stage, it is not possible to determine whether or not the additional noise impacts have been appropriately assessed and whether or not the mitigation currently proposed is adequate.

## **Traffic and Transport**

A thorough assessment and understanding of the local and strategic highway network both in Luton and Hertfordshire will be expected within any planning application given the significance of the proposals. The County Council's main concerns in terms of the potential impact of the proposals upon the Hertfordshire road network relate to the A505 (Hitchin), the A1081/A5183 (Harpenden), and the B653 (Wheathampstead), A602 (Hitchin to Stevenage), M1 and A1(M) junctions. In addition diversion routes for strategic road closures and localised rat runs for both passenger and employee travel should be considered.

## **Job Growth and Contribution to the Economy**

The consultation material contains supportive statements about the likely scale of job generation facilitated by the proposals – 1,700 direct jobs and 4,500 indirect jobs. The County Council will wish to see robust evidence accompanying the planning application on how these employment levels have been derived.

It is encouraging that the Masterplan indicates that the EIA process will explore the local, regional and national economic impacts of the development proposals. However, it will also be necessary to determine the suitability of the local workforce to fulfil employment

opportunities. Should a local workforce not be identifiable, then any environmental impacts associated with increased commuting in to and out of the airport be taken into account as part of the Environmental Statement.

### **Carbon Dioxide Emissions**

The County Council's Corporate Plan 2009/12 contains its commitment with regard to reducing carbon emissions. Amongst a range of other considerations, one of these is to resist airport expansion and to mitigate the impact of air traffic. The County Council will expect the planning application to contain a comprehensive analysis of aircraft and non-aircraft related CO2 emissions, within the spirit of the Airport's Environment Policy.

### **Air Quality/Water Environment/Management**

The County Council will expect to see any planning application to be accompanied by a comprehensive analysis of what water management and water and air quality issues are raised by the proposed expansion and how these are to be effectively addressed and managed.

The Masterplan currently states that *"the assessment of air quality impacts associated with the development proposals will consider five principal areas of potential effect"* (Para 9.22). However, it appears that only three areas are mentioned within the remainder of Para 9.22 and clarity is sought on what the other two areas of potential effect are.

As with the other potential environmental impacts considered through the EIA process, stakeholders should be given the opportunity to consider the methodology used to assess the potential effects of the proposal on air quality, prior to the assessment being undertaken.

### **Airport Security and Policing**

An issue which the pre-application material appears not to mention is how an airport with a proposed near-doubling of capacity is to be policed, what additional security issues are envisaged as a consequence of expansion and how these are to be managed and funded (outside of the proposed terminal improvements).

A paper copy of this letter has been posted to you.

Yours sincerely,



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Senior Engineer - Major Projects

**Contact from 15 Oct 2012: Chris Bearton 01992 556309**