

February 2023

# London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 6 Consultation Report

**6.02 Consultation Report Appendix J**

**2022 Statutory Consultation Materials Part 1 of 2**

Application Document Ref: TR020001/APP/6.02

Planning Act 2008

APFP Regulation: 5(2)(q)



**The Planning Act 2008**

**The Infrastructure Planning (Applications: Prescribed Forms and Procedure)  
Regulations 2009**

**London Luton Airport Expansion Development Consent  
Order 202x**

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**6.02 CONSULTATION REPORT APPENDIX J: 2022**

**STATUTORY CONSULTATION MATERIALS PART 1 OF 2**

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# Appendix J

## J1 Consultation brochure

# Future LuToN

Making best use of our existing runway

**Consultation brochure**

Statutory consultation 8 February – 4 April 2022



**Luton**  
**Rising**

Our airport.  
Our community.  
Our planet.

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# 01 Introduction

## Foreword from the Board of Luton Rising

We are Luton Rising, the trading name of London Luton Airport Limited, by which you may have previously known us. The name Luton Rising better reflects the wide range of assets we look after, and a broader mission than just being an airport owner. It also reflects our own ownership structure: uniquely for a major UK airport, we are wholly publicly-owned – by Luton Borough Council – which means that we can focus on benefit to the community rather than private shareholders.

Our largest asset is London Luton Airport, and this document is about our plans for expansion of the airport, and how you can have your say about them.

We are legally obliged to hold a public consultation before submitting our plans, but we don't see this consultation as a box-ticking exercise. We want to hear your views, and use them to help inform our proposals, as we have done following the two rounds of public consultation we've already held.

The proposals described here differ in important ways from those we presented at the previous statutory public consultation in 2019. For example, we have redesigned the scheme so that it moves far less earth to build the platform for the airfield – the equivalent of two Wembley Stadiums less. We have also heard your concerns about the environmental impact, and are proposing a new Green Controlled Growth framework. It places robust limits on key environmental impacts, and will not rely on our good faith to keep to them. They will be legally binding, and independently monitored.

Nevertheless, we do have good faith. You might think it odd for a company that owns an airport, but sustainability is a central part of our values. We believe there is a way to grow an airport in a sustainable and responsible way, and we describe how we set about that in this document.

Sustainability is about more than environmental issues – it's social and economic impacts too. Our airport is a vital part of the economic eco-system of the region and beyond, directly or indirectly supporting tens of thousands of jobs. The proposed expansion to 32 million passengers a year will generate thousands more jobs and more than a £1 billion increase in economic activity in Luton and the neighbouring counties. We want more local people to be able to access these jobs, so our proposals also include an extensive Employment and Training Strategy to make that possible.

Our airport is the most socially impactful in the UK. Since 1998, we have contributed £257 million to support frontline services and £155 million to support local community organisations and charities. These organisations help make life-transforming changes for people, and our proposals include the new Community First fund, which will allow for much greater support for community projects in Luton and the neighbouring counties.

We have made the case that our airport does much that is good. It can also cause effects which are not so good.

We understand that people who live under flightpaths to our airport are worried about the potential increase in noise from aircraft. This is a very reasonable concern, and strict limits on the impact of noise are included in the Green Controlled Growth framework mentioned above. We have also changed the compensation proposals for people who are affected by aircraft noise so that they are both more generous in the amounts of money available, and made available at lower noise thresholds than previously. Together, these changes make the noise compensation package among the most generous offered by a UK airport.

Closer to the airport, we know that many users of Wigmore Valley Park are upset about how the plans for expansion involve building over part of the park. We have listened closely to these concerns.

Alongside our commitment to make the park at least 10% bigger than at present, our revised design includes protecting more of the existing habitat and landscape, better screening of the airport, and repositioning the new area nearer to the community it serves.

To address the potential loss of biodiversity, we will also create new areas of natural habitat such as native broadleaf woodland and meadow grassland. The effect will be an overall increase in biodiversity of at least 10%.

We want to hear what you have to say. We aim to make it as easy as possible for you to get access to all the information, ask all the questions you want and make your views known, whether that's online or at one of the in-person events (Covid permitting).

Airport expansions affect a lot of people – in both good ways and bad. We need our proposal to help balance those benefits and disadvantages as fairly as possible, and your views can help us do that.

## About this consultation

This is our second statutory consultation, and third public consultation overall, on our proposals for making the best use of the airport's existing runway. Future LuToN is our proposal to build a new terminal and associated infrastructure to increase the capacity of the airport in terms of the number of flights and passengers it can handle. The permitted capacity of the airport is currently 18 million passengers per annum (mppa) and we're seeking to increase this to 32 mppa.

Following the valuable feedback you shared with us during the consultation in late 2019, we've completed a detailed review of the scheme and have made some key changes to our proposals, which we've set out in section 3 of this brochure. However, this consultation is on the scheme as a whole, as we want to ensure you have a full picture of our plans for the airport and can provide any further feedback to help us improve our proposals before we submit our application.

**This consultation is running between Tuesday 8 February and Monday 4 April 2022. Please visit: [redacted] or pick up a copy of the consultation response form from one of the locations listed in section 9 of this brochure.**

**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.**





In addition to 13 face-to-face events and 10 document inspection venues across Luton and the surrounding areas, we have created a dedicated virtual consultation room which is open throughout the consultation period. This provides an opportunity to read about our proposals, download copies of the consultation materials, submit questions to the team, and complete the consultation response form online. You can visit our virtual consultation room at: [\[redacted\]](#)

Details of our face-to-face events, document inspection venues, and ways to get in touch with us can be found in section 9 of this brochure.

**Who we are**

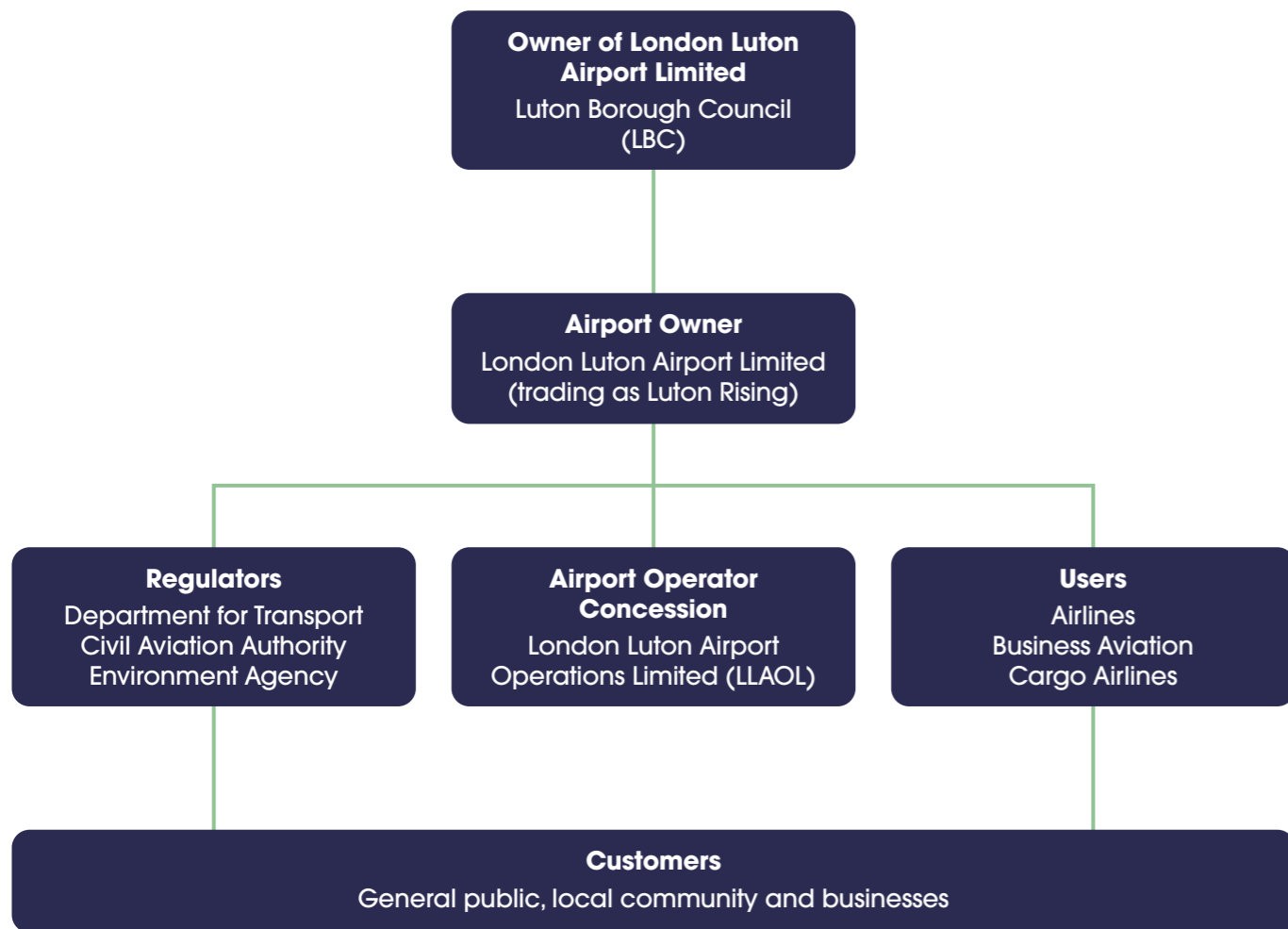


Table 1.1 The story so far

| Late 2017   | Summer 2018  | Early 2019  | Late 2019  | 2020 and 2021   |
|---|--|---|--|---|
| <p>We published our Vision for Sustainable Growth 2020-2050, setting out our long-term strategy for expanding the airport. You can find this document on our website: <a href="http://www.lutonrising.org.uk">www.lutonrising.org.uk</a></p> <p>Further technical work was then completed to look at the potential options for expansion.</p> | <p>We held a non-statutory consultation on a shortlist of four options which emerged from the options assessment process.</p> <p>In total, we received 892 responses to the consultation. The consultation responses provided valuable feedback on our proposals, which helped us understand the potential environmental impacts and how these might be managed and mitigated.</p> | <p>Following a review of the feedback, further consideration of the options for expansion, and further technical assessments, we published our response to the summer 2018 consultation.</p> <p>This included the announcement of our proposed development plans for expansion: a new second terminal to the north of the runway to increase capacity to 32 mppa.</p> | <p>We held our first statutory consultation on our proposals for expanding the airport.</p> <p>3,501 people provided a response to the consultation, including those who signed two petitions, and a number of important points were raised. You can read about the key themes raised and our response to these on pages 10-11 of this brochure.</p> | <p>We carefully considered the responses received to the consultation as the situation with Covid-19 developed. We decided to carry out an in-depth review of the scheme to take into account the impacts of Covid-19 and other factors such as Brexit and the ongoing effects of climate change as well as the consultation responses received. Following this, we have made some key changes to our proposals and are holding a second statutory consultation on the scheme as a whole.</p> |

**How we have taken on board your feedback to date**

**Our response to your feedback**

We've carefully considered all of the comments received during the 2019 consultation and have updated our proposals to take these on board where possible. The key changes we have made are described overleaf and a full description of all the comments made and our response can be found in our **2019 Statutory Consultation Feedback Report**.

## Managing the impact on local communities

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 future expansion which we are calling 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. It will put in place a set of binding limits for surface access, air quality, noise and greenhouse gas emissions meaning growth at the airport will be allowed only where it can be shown to be delivered within those limits. You can read more about GCG in section 3 of this brochure, and in more detail in our **Draft Green Controlled Growth Proposals** document.

## Sustainability

We know that sustainability is important to you, and it's important to us too. As part of our updated design we've reduced the footprint of the airfield and the amount of earthworks needed to expand, which has reduced the overall construction activities.

We've also incorporated lots of sustainability measures into our proposals, including renewable energy such as solar and geothermal, as well as rainwater harvesting. We'll also design the new terminal to BREEAM Excellent standard, which is the world's longest established method of assessing, rating and certifying the sustainability of buildings.

## Accessing the airport

Since we consulted in 2019, we're now including the entirety of the new Airport Access Road (formerly known as Century Park Access Road) and improvements to the Airport Way/Percival Way junction in our proposals. We decided to include a slightly modified version of the access road within our proposals due to the economic uncertainty caused by Covid-19. Our updated proposals would mean that the road is ready to use ahead of when it would be needed or access to the expanded airport. 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

We know from the 2019 consultation that Wigmore Valley Park is an important local open space that people want to see protected and improved. We've updated our design to keep more trees and maintain biodiversity and to retain an existing ridgeline which will provide visual screening of the airport.

## Construction

Many respondents to the 2019 consultation were concerned about the potential disruption that could be caused during construction. We've amended our design to reduce the size of the airfield platform and landside remediation works, which will significantly reduce the amount of earth that needs to be moved and the materials that need to be brought onto the site. This will reduce the construction works on site and mean would be fewer construction vehicles on the surrounding roads.

We've also changed the phasing of development which means construction will now start later and finish later. The scale of the project does mean that it would be delivered over several years. The overall delivery period is expected to be over a period of up to 20 years during which there will be periods of construction activity and other periods with no activity.

## Other changes to our plans

We've made other changes to our design, 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, moving the fuel storage facility further away from the runway, and adding a Surface Movement Radar to the south side of the runway.

## Navigating the consultation documents

The aim of this consultation brochure is to give you an overview of the scheme so that you can respond to the consultation. This brochure includes information about:

- Why we're expanding the airport and the benefits expansion would bring
- Our proposals for expanding the airport, including GCG
- How we would improve access for people travelling to and from the airport
- Our plans for building the scheme
- How we're planning to manage the impacts of expansion
- The land we need to build the scheme and how we would compensate people for using this
- Details about the future operations of the airport and flightpaths

We've also included a glossary in section 10 of this brochure to explain all the technical language and acronyms used.

This brochure can be read alongside the **Consultation Response Form** to give feedback on our proposals. We've also created a number of technical documents to support the information given in this brochure for people who



are interested in reading more detail. Where we have referred to one of these technical documents within this brochure, the name of the document is shown in bold. All of the documents are available to view on our website at: [www.lutonrising.org.uk](http://www.lutonrising.org.uk), and at our document inspection venues, and face-to-face events. Further details can be found in section 10 of this brochure.

### Overview documents



**Consultation Brochure**

**Consultation Summary & FAQ Booklet**

**Statement of Community Consultation**

**Consultation Event Boards** (these can also be viewed in our virtual consultation room or at one of our face-to-face events (see section 9 of this brochure for details))

**Consultation Response Form** (this can be completed online via our website or returned via email or Freepost (see section 9 of this brochure for details))

### Technical documents if you want more information



**Draft Employment and Training Strategy**

**Draft Green Controlled Growth Proposals**

**Works Description Report**

**Getting To and From the Airport - Our Emerging Transport Strategy**

**Preliminary Environmental Information Report (PEIR), including non-technical summary**

**Draft Sustainability Statement**

**Draft Need Case**

**Draft Land Assembly Plans**

**Draft Compensation Policies and Measures**

**Draft Equalities Impact Assessment**

**2019 Statutory Consultation Feedback Report**

## Our application for development consent

As we're planning to expand the airport's capacity by more than 10 mppa, the scheme is classed as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008 (the Act). This means that we need to apply to the government for permission to expand the airport, rather than the local planning authority, Luton Borough Council. This type of permission is called a Development Consent Order (DCO).

After we've carefully considered your responses to this consultation, we'll finalise our proposals for the scheme and submit our application for development consent. The application will be examined by the Planning Inspectorate and the final decision will be taken by the Secretary of State for Transport. You can see a timeline of the DCO process in section 9 of this brochure.

In line with the Act, we've published our **Statement of Community Consultation** (SoCC) as part of this consultation. The SoCC explains how we're consulting people who live in the area around the airport. We consulted with local authorities on a draft of the SoCC so that we could take their feedback on board before publishing.

You can find out more about the DCO process on the Planning Inspectorate's website: [infrastructure.planninginspectorate.gov.uk](https://infrastructure.planninginspectorate.gov.uk)

## Planning context

This section provides an overview of the relevant planning policy context, which our application for development consent will be considered against.

### Airports National Policy Statement

According to the Act, when determining applications for development consent the Secretary of State must 'have regard' to any National Policy Statement (NPS) which has 'effect' in relation to the proposed development. This means that they must consider the relevant NPS and how the scheme complies with the policy.

The Airports National Policy Statement (ANPS) was designated in June 2018 but only has 'effect' in relation to the delivery of additional airport capacity through the Heathrow Northwest Runway project. However, paragraph 1.41 of the ANPS sets out that the contents of the ANPS will be both an important and relevant consideration in the determination of an application for development consent for any other airport development, particularly where it relates to London or the South East of England.

Nonetheless, paragraph 1.39 of the ANPS makes clear that, alongside the provision of an additional runway at Heathrow, the government supports other airports, including those in the South East of England, making best use of their existing runways:

*"the Government has confirmed that it is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have positive and negative impacts, including on noise levels. We consider that any proposals should be judged on their individual merits by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts."*

Paragraph 1.42 of the ANPS sets out that any such application should be judged on its individual merits and that it may well be possible for existing airports to demonstrate sufficient need for proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.

Paragraph 4.4 of the ANPS provides further detail on weighing the planning balance, including consideration of:

- potential benefits, including the facilitation of economic development (including job creation) and environmental improvement, and any long term or wider benefits; and
- potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts.

Section 105 of the Act sets out what the Secretary of State must have regard to in making a decision on an application for development consent where no NPS has effect. This includes any matter that the Secretary of State thinks is important and relevant to the decision.

The remainder of this section provides an overview of the other key relevant national and local planning policy and strategy documents against which the application for development consent will be considered by the Secretary of State.

### Aviation Policy Framework (March 2013)

The Aviation Policy Framework (APF) was published in March 2013 and remains relevant policy covering expansion at airports other than Heathrow. This sets out the overarching strategy primarily for supporting economic growth and other benefits through the aviation sector, and for managing the environmental impacts of aviation development in the UK.

The APF sets out that a key priority is to work with the aviation industry and other stakeholders to make better use of existing runway capacity at all UK airports. It also recognised that, beyond 2020, there would be a capacity challenge at all of the biggest airports in the South East of England.

Although the ANPS sets out government policy on the priorities for expanding airport capacity in the South East of England, the APF sets out government policy on other aviation-related development across the entirety of the UK. The APF is therefore considered relevant in relation to wider aviation issues, as stated in paragraph 1.38 of the ANPS.

Whilst not providing any specific commentary on airport expansion in the South East, the APF does indicate that the government recognises the very important role airports across the UK play in providing domestic and international connections and the vital contribution they can make to the growth of regional economies.

### Beyond the Horizon: The future of UK aviation – Making best use of existing runways (June 2018)

This policy document, which was published alongside the ANPS, sets out the specific principles applying to the government’s support for airports making best of their existing runways across the whole of the UK. Paragraph 1.29 concludes:

*“Therefore the government is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have negative as well as positive local impacts, including on noise levels. We therefore consider that any proposals should be judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations. This policy statement does not prejudice the decision of those authorities who will be required to give proper consideration to such applications. It instead leaves it up to local, rather than national government, to consider each case on its merits.”*

### National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) does not set out the primary policy context or decision-making principles for applications for development consent under the Act. The NPPF makes clear that it is not intended to contain specific policies for NSIPs and that it is the role of the relevant NPS to assume that function and provide policy to guide individual development proposals brought forward under it.

There are instances where the NPPF may provide more detailed, relevant and/or more up to date guidance than the ANPS. Like the ANPS, the NPPF is therefore an important and relevant consideration in decision making for applications for development consent, particularly in the absence of an NPS which has effect.

### Local Development Plan documents

Although local development plan documents are not the starting point for the consideration of an application for development consent, they can be an important and relevant consideration.

The table overleaf identifies the statutory development plan documents of the four host\* authorities, which have been considered in the development of our proposals. Other relevant policy documents, such as local transport plans, have also been considered.

These development plan documents contain relevant planning policies on a wide range of issues including the environment (noise, air quality etc.), transport, design, sustainability and the Green Belt which have informed the development of the proposals and the assessments contained in the **PEIR**.



Table 1.2 Local Development Plan documents

| Local Authority                      | Development Plan Document  | Adopted                           |
|--------------------------------------|--|-----------------------------------|
| Luton Borough Council                | Luton Local Plan 2011-2031   | November 2017                     |
| Central Bedfordshire Council         | Central Bedfordshire Local Plan 2015-2035  | July 2021                         |
| North Hertfordshire District Council | District Local Plan No. 2 with alterations   | April 1996 – saved September 2007 |
| Cross Boundary                       | Bedford Borough, Central Bedfordshire and Luton Borough Councils Minerals and Waste Local Plan: Strategic Sites and Policies | January 2014                      |
| Hertfordshire County Council         | Waste Core Strategy and Development Management Policies  | November 2012                     |
|                                      | Minerals Local Plan 2002-2016  | March 2007                        |

*NB. The emerging North Hertfordshire District Council Local Plan is at an advanced stage of preparation, with the Inspector’s Final Report due to be issued imminently. Once adopted, this will replace the saved policies of the extant local plan. Other emerging local plan documents are at an earlier stage of preparation.*

### Other relevant policy documents

In addition to those mentioned already, there is a wide range of other planning policy and related documents which will be relevant to the consideration of our application for development consent. This will include Jet Zero, the government’s proposed approach and principles to reach net zero aviation by 2050, which is due to be published in early 2022.

A Planning Statement will be submitted with our application for development consent which will assess the compliance of the proposals with all relevant national, regional and local planning policy, drawing upon the conclusions of the supporting application documents and weighing the potential benefits and adverse impacts of the scheme in the planning balance.



# 02 Background to the consultation

## The airport today

**London Luton Airport is the only major airport in the UK that is 100% owned by the local authority.**

Our Board of Directors is appointed by Luton Borough Council, as shareholder, predominantly from amongst its elected members. Because the airport remains the UK's only major airport wholly publicly owned by the local authority, financial benefits arising from airport ownership flow directly into local communities.

The airport is managed and operated day-to-day by London Luton Airport Operations Limited (LLAOL) under a concession agreement until 2032. LLAOL is 51% owned by Aena Internacional, the international business arm of the Spanish national airport operator, and 49% owned by AMP Capital, the owner of Newcastle and Leeds Bradford airports.

**Before the Covid-19 pandemic and its restrictions on travel, the airport was the UK's fifth largest and one of its fastest growing airports, serving approximately 18 million commercial passengers each year.**

Both TUI and easyJet are based at the airport, along with Wizz Air's UK operation. Other main airline operators include Ryanair, Vueling, and Blue Air, flying all over Europe, North Africa, and the Middle East. As well as scheduled passenger flights, the airport has a small cargo centre handling regular cargo flights to Istanbul, Amsterdam, Frankfurt and Paris. The airport is also a significant airport for business aviation, with separate terminals managed by Signature Flight Support and Harrods Aviation and associated hangar and maintenance operations. The airport also supports substantial aircraft maintenance activity. This is related to the historic position of the airport as the headquarters of several airlines and reflects the strength of engineering skills in the Luton area.

The airport's existing passenger facilities are concentrated in a central terminal area, served by a dual carriageway access road from New Airport Way. Located around the terminal area is the passenger aircraft apron, where planes are parked, refuelled and loaded. The airport has a single runway running approximately east to west which is 2,162m in length, suitable for aircraft with a wingspan up to 65m wide, such as the Boeing-787 and Airbus A350, which could operate some longer haul services, as well as the aircraft typically used for European flights today. In addition to facilities for passenger flights, there is a small cargo centre and associated apron to the north of the site with two aircraft stands, three terminals for business aviation aircraft users with adjacent apron areas, and several hangars used for the storage and maintenance of aircraft for both commercial airlines and business aviation aircraft.

## Current investments at the airport

Along with our partners, we are making major investments to enhance the airport.

### Luton DART

We are currently making significant investments to make the airport more accessible by public transport. Our current development programme includes the Luton Direct Air-Rail Transit (Luton DART), which will transform passenger access between the airport and the national rail network. Currently, shuttle buses transport passengers between Luton Airport Parkway station and the airport. The Luton DART will be a fully automated and driverless system, approximately 2km in length. It will provide fast, frequent, and reliable transfers with capacity for 2,700 passengers each way every hour between Luton Airport Parkway station and the existing terminal in under four minutes, 24 hours a day. This will mean that passengers can reach the airport from London St Pancras station in as little as 30 minutes.

The Luton DART is expected to be open in 2022 and will support our goal of increasing the number of passenger journeys made to the airport by public and sustainable transport from the current 38% to at least 45%.

### London Luton Airport Enterprise Zone, New Century Park and Bartlett Square

In 2015, Luton Borough Council secured Enterprise Zone status for the area immediately to the east, north and west of the airport's existing terminal. The London Luton Airport Enterprise Zone, which came into effect in 2016, is one of 48 across the UK and one of only two at a major commercial airport. In Autumn 2018 and Spring 2019, Luton Borough Council resolved to grant planning permission, subject to completion of legal agreements, for two major mixed-use developments within the Enterprise Zone: Bartlett Square and New Century Park.

Bartlett Square, situated adjacent to Luton Airport Parkway station and the proposed Luton DART, comprises 2.5 acres and is planned for commercial development including 240,000 square feet of office space, 170-room hotel, complementary retail, and multi-storey car parking. Works to provide pedestrian access across Bartlett Square to the Luton DART station from Kimpton Road is expected to begin in 2022 and complete to coincide with the opening of the station.

New Century Park sits to the north east of the airport, and is proposed to include hotels, office space, industrial and manufacturing space, and improved facilities in the northern section of Wigmore Valley Park.

Together, these developments are expected to generate more than 5,000 jobs.



### Project Curium and immediate growth plans

In 2014, planning permission was granted for works to accommodate passenger capacity to 18 mppa, up from 12 mppa previously. LLAOL is responsible for the airport's development programme to increase capacity, known as Project Curium. Project Curium involves improvements to passenger facilities in the existing terminal and aircraft stands, improvements to car parking in the central terminal area, and works to aircraft taxiways.

Passenger demand for flights from the airport grew rapidly in the period between 2014 and 2019, since planning permission was granted for Project Curium. This was in part due to capacity constraints at the other London airports, particularly Heathrow, and because of the growth strategies of the airport's main airline customers. As a result, the airport reached its permitted annual capacity of 18 mppa in 2019.

Consequently, LLAOL brought forward a local planning application to allow the airport to be used by up to 19 mppa as an interim step towards meeting growing demand based on the higher number of passengers per aircraft being attained by the airlines. This increase will not require additional infrastructure over and above the provision planned for commercial passenger operations as part of Project Curium. The local planning authority resolved to grant this application but, 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.

### Why grow?

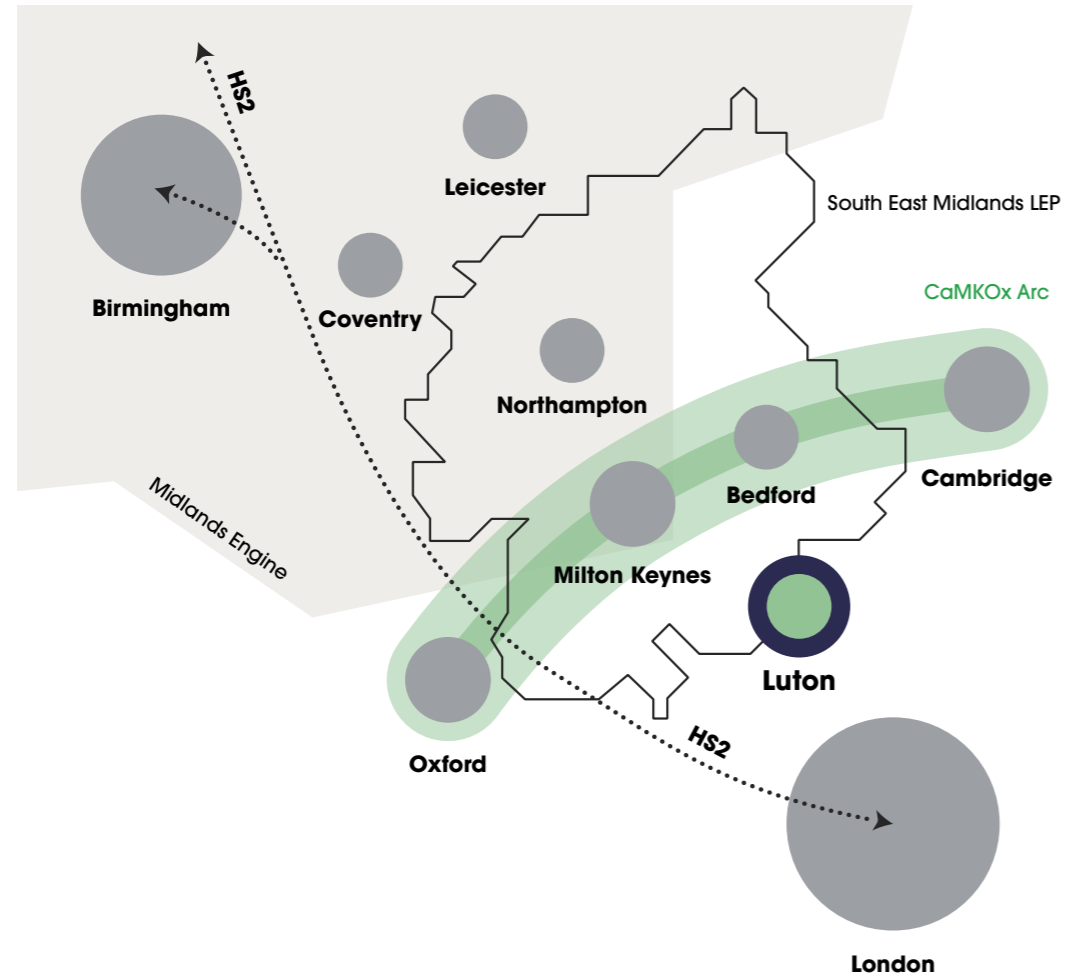
**The airport is central to the local economy and is strategically positioned in the broader region, where it serves as an important connectivity asset.**

Luton sits at the centre of both the Oxford-Cambridge Arc and England's Economic Heartland, covering a region stretching from Swindon to Cambridgeshire and Northamptonshire to Hertfordshire where the sub-national transport body has brought political and business leaders together to realise the region's economic potential and achieve net-zero carbon. This area is home to many international businesses making a significant economic contribution both regionally and nationally and which depend on good global connectivity.

With the Heartland's 30-year strategic transportation vision putting the needs of businesses, individuals and the environment at the forefront of investment decisions, London Luton Airport has a vital role to play delivering strengthened connectivity required to support economic and productivity growth, alongside projects including the accelerated delivery of an east-west rail link.



Figure 2.1 Oxford-Cambridge Arc

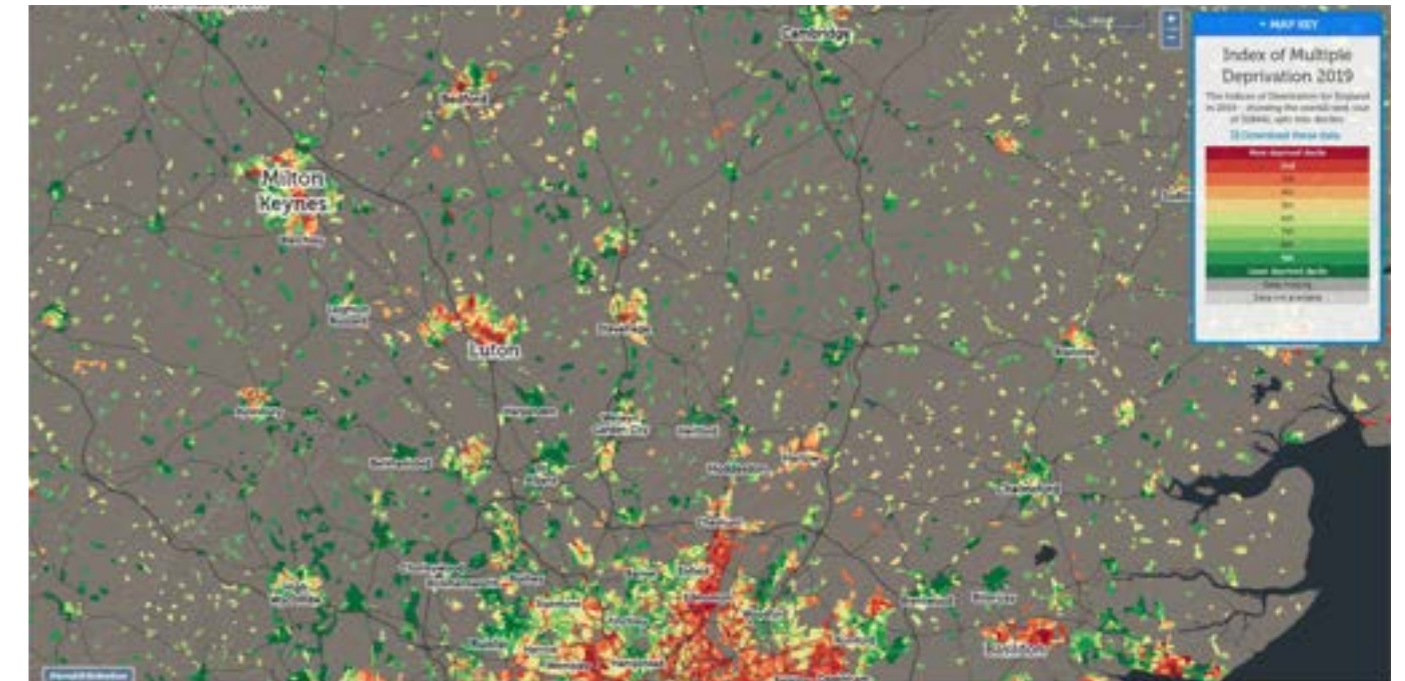


The economic success of areas such as the Arc is fundamental to the government’s plan to ‘Build Back Better’<sup>1</sup> following the Covid-19 pandemic. In this context, the government remains supportive of airports seeking to ‘Make Best Use’ of their existing runways because of the vital role that they play in providing connectivity for business and social purposes.

<sup>1</sup> ‘Build Back Better: our plan for growth’, A publication setting out the government’s plans to support economic growth through significant investment in infrastructure, skills and innovation, published 3 March 2021

**The airport plays a key role in securing ‘levelling up’ of the economy of Luton and other nearby areas of deprivation.**

Figure 2.2 Deprivation map



Source: ONS

The airport is one of the main economic drivers of Luton, supporting jobs and economic activity in an area marked by high levels of deprivation. Luton has some of the most deprived wards in the East of England and is designated a ‘Level 1’ priority for levelling up. Luton is currently ranked as the 52nd (out of 317) most deprived local authority and more than a third of children in Luton are currently living in poverty. This has significant adverse consequences, such as:

- Children from the most deprived families are on average 15 months behind those from more affluent ones in their vocabulary skills by the age of five.
- Men living in the town’s most deprived areas can expect to live on average nine years less than those from more affluent parts of Luton and surrounding counties. For women, the life expectancy gap is seven years.

The airport is the largest employer in the town and its growth has the potential to generate substantial employment both directly and through attracting other businesses to locate in the area.

For this reason, the continued success of the airport and its ability to support employment and opportunity is critical to the government’s levelling up agenda.

**In order to maintain its connectivity and economic contribution across the region, the airport has to address its capacity constraints.**

The airport has been growing very quickly, particularly over the last five years before the Covid-19 pandemic and reached the cap on its passenger capacity

of 18 mppa in 2019. The airport is expected to reach 18 mppa again in around 2023/4 and demand will continue to rise. If the airport is not allowed to expand its capacity, it will not be able to increase the services that it offers to passengers. This will mean that it will not be able to add services to new destinations, including those which would be valuable to businesses, and over time, it is likely that the range of destinations served would shrink, with increasing concentration on the most profitable routes for the airlines, which are often those serving mainly UK outbound tourists. Importantly, it will not be able to increase employment opportunities for the local area.

Growth of the airport would support the economic development objectives not just of Luton but those of the neighbouring districts and counties, particularly in Bedfordshire, Buckinghamshire and Hertfordshire ('the Three Counties').

**Without additional capacity, the airport will not be able to meet the needs of its catchment area for improved air connectivity and support the regeneration of Luton.**

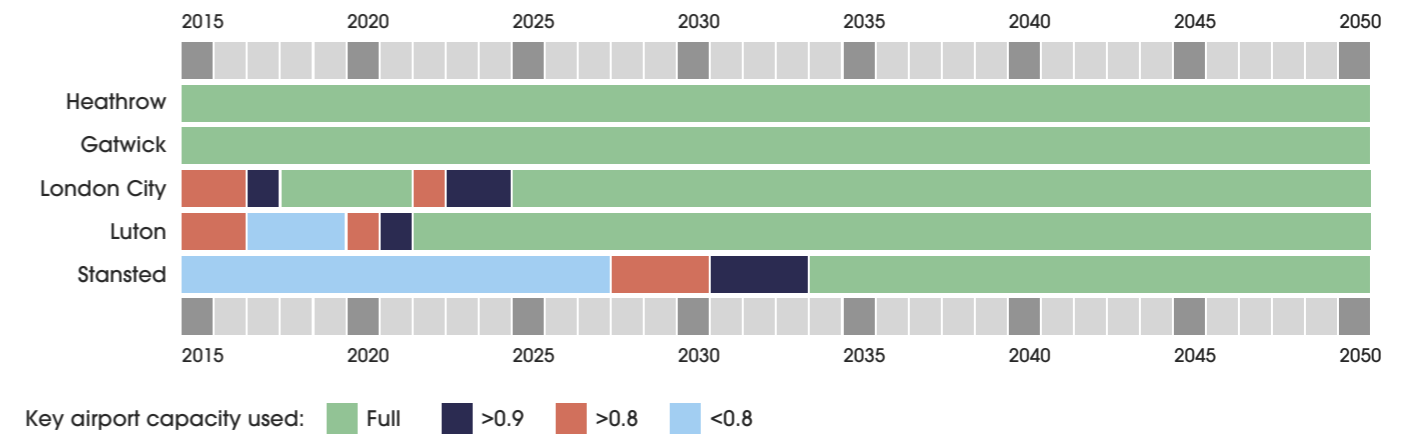
Should expansion of one of Luton's key infrastructure assets be curtailed, it will have large repercussions for the prosperity of the town, allowing the growth and opportunity of the region to bypass Luton. Residents will continue to commute out of Luton to higher paid jobs. The area would fall behind in terms of its air connectivity offer, meaning that passengers would have to use more distant airports, and this would hamper other economic initiatives to promote growth within the Oxford-Cambridge Arc. The Arc would become relatively less attractive compared to other regions where airports are still able to expand to meet passenger demand and improve overall connectivity.

**Growth in demand for air travel**

Demand for air transport has grown rapidly in the UK, more than doubling since 1997 and reaching 297 million passengers using UK airports in 2019. According to national aviation forecasts produced by the Department for Transport (DfT) in 2017<sup>2</sup>, UK air passenger demand was forecast to increase to between 334 and 380 million passengers per year by 2030 and to between 468 and 533 million passengers per year by 2050. Although the Covid-19 pandemic has impacted on the timescale over which this growth in passenger demand is expected to be realised, demand is still expected to reach these levels but around five years later. In 2017, DfT's assessment was that all of the London airports, including London Luton Airport, were expected to reach their consented capacity limits over the period to 2040. This provides the context for our expansion proposals.

2 Department for Transport, UK Aviation Forecasts 2017

**Figure 2.3 Central growth scenario, no new runways, London airports, timeline of capacity usage**



The proportions shown relate to the higher of the terminal capacity or runway capacity used  
 Luton's capacity increased in 2017  
 London City's capacity increases in 2022

Source: DfT UK Aviation Forecasts 2017

With capacity constrained, many passengers travelling to and from the South East of England would have to travel longer distances to make use of airports in other regions, increasing congestion on the UK's road and rail infrastructure. Even with a third runway at Heathrow and anticipated growth at other airports, there would still be a shortfall in capacity to meet demand, particularly across the London airports. This is why we are bringing forward proposals to meet that gap in the availability of airport capacity, along with proposals by other airports such as Gatwick.

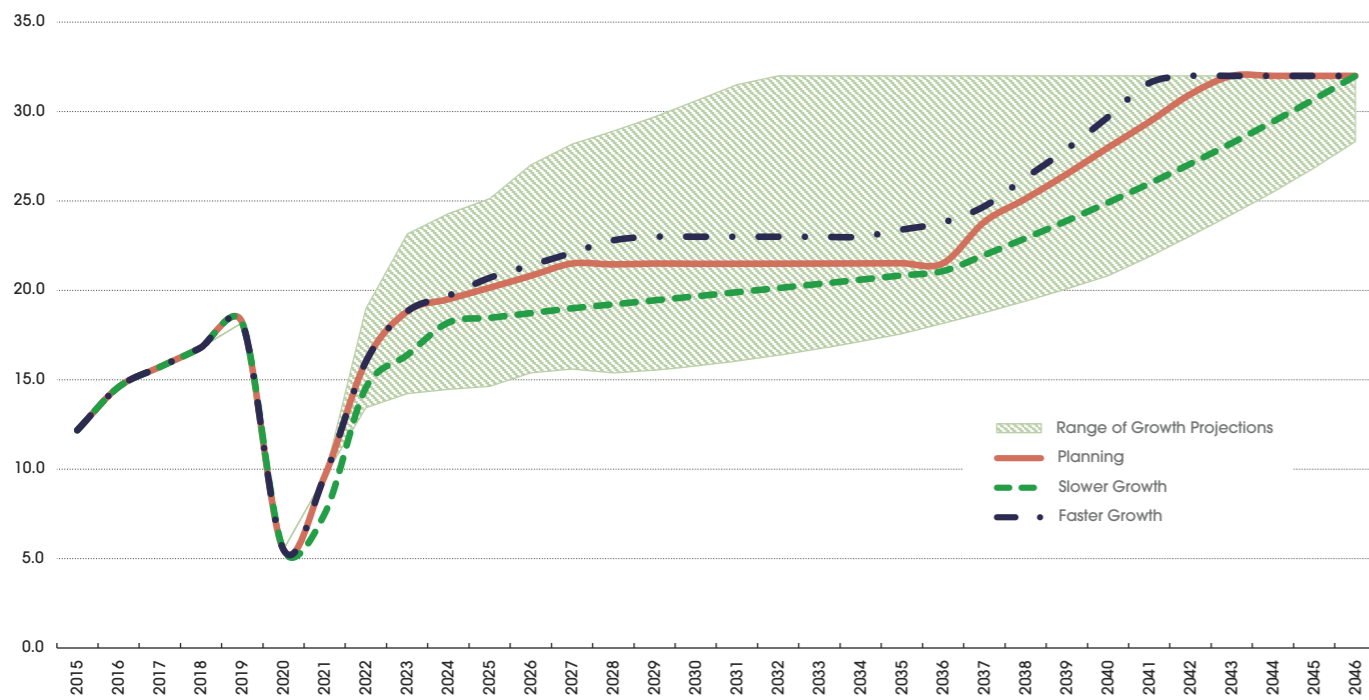
**We have updated our demand projections for the airport. These take into account Covid-19, Brexit and the carbon implications of growth.**

The Covid-19 pandemic led to an almost complete suspension of flying from many UK airports in 2020 and a significant drop in demand, but demand is expected to recover by around 2023/4, meaning that our airport would be full again. Given the pandemic, we have updated our projections of future demand, taking into account the latest economic projections as well as factoring in the projected cost of carbon and post-Brexit implications. The forecasts are also set out as a range to reflect greater market uncertainty over the forecast period.

Our approach to preparing demand forecasts for the airport begins with examining the overall market for air travel in the airport's catchment area using the economic relationships set out in the DfT's UK Aviation Forecasts 2017 updated to the latest projections of gross domestic product (GDP) and a range of other variables, including overseas GDP and the costs of air travel, including taxes and carbon costs. We then take into account the airport's share of the overall market allowing for potential increases in capacity at other airports. To that end, we have considered the impact on demand at the airport if Heathrow

builds a third runway, Gatwick uses its northern runway or a combination of the two, alongside the already consented expansion at Stansted and growth across regional airports. This results in a range of projections for the number of passengers that the airport might handle each year under different economic conditions and with different combinations of airport capacity elsewhere if it had the capacity to do so up to a throughput of 32 mppa, which forms the basis for our application for development consent.

Figure 2.4 Range of Unconstrained Passenger Demand Forecasts for the airport up to 32 mppa and forecast cases for assessment



Source: London Luton Airport Expansion Draft Need Case

We consider that these forecast scenarios represent a reasonable range of the demand that the airport could attract if it had the capacity to do so and dependent upon capacity delivered at other airports serving the wider catchment area. We have used these scenarios as the basis for developing forecast cases for assessment that take into account the timescale over which new capacity can be delivered at the airport, which lags behind the potential demand under almost all scenarios.

In practice, the ability to accommodate this demand is likely to be limited by the capacity available at the airport until construction of infrastructure is completed. Growth in passenger numbers in the short-term will be constrained by available infrastructure capacity, primarily in relation to aprons and stands. It is for this reason that we are proposing that the application for development consent provides for the interim steps that can be taken to increase the effective capacity of the existing infrastructure of Terminal 1, ahead of the introduction of



Terminal 2. Taking these interim steps into account, our core planning scenario shows that the airport is expected to reach 32 mppa by 2043, allowing for one new runway at either Heathrow or Gatwick. This is considered to represent the most robust basis for considering the need for additional capacity at the airport and assessing the associated effects. Faster and slower growth scenarios see 32 mppa reached one year earlier or three years later respectively.

As the airport grows, it is expected that low-cost airlines will continue to be the dominant airlines. However, with constraints at other airports around London and a growing base of local demand, it is expected that there will be some growth by other airline operators. This may include national airlines (known as 'flag carriers'), and also regional and long-haul airlines with aircraft capable of using the airport's runway.

### Benefits of expansion

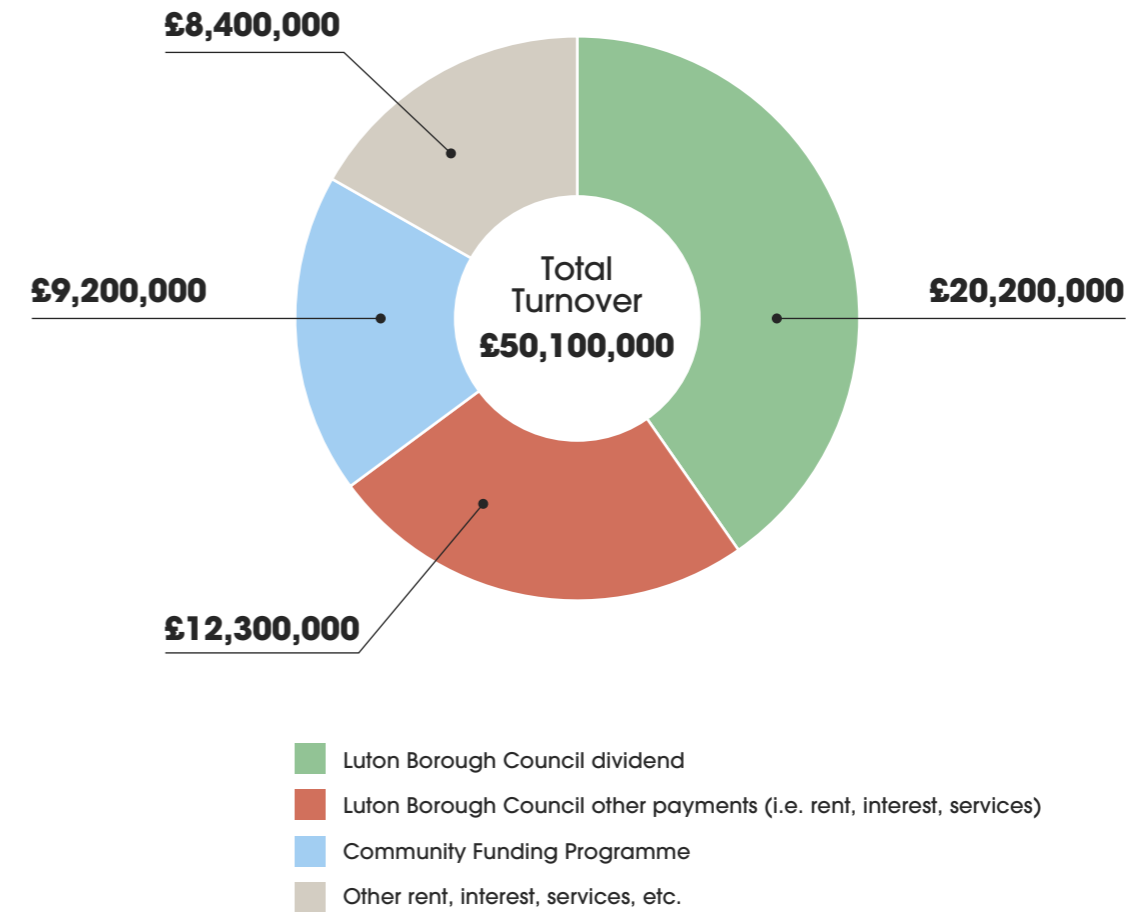
#### What benefits are we contributing now?

##### Why Luton?

Given the need for regeneration in Luton, we understand the importance of maximising the economic benefits and social value of the airport, one of Luton's main infrastructure assets. The airport has been a part of Luton's history for over 80 years and we recognise the important role it has played in helping to shape the development of the town and the surrounding counties. This includes supporting the local economy and community in a number of ways:

- The airport supports a critical supply of jobs and economic activity in Luton, the counties of Bedfordshire, Buckinghamshire and Hertfordshire, and beyond.
- The average wage of those working at the airport in 2019 was £41,100, which was 34% higher than the national average and 27% higher than the average of all jobs in Luton.
- Dividends and other payments from Luton Rising are paid to Luton Borough Council, supporting frontline services in the community.
- On top of that, we take our social responsibilities seriously and contribute to local good causes through our community funding programme. Since 2002, we have provided more than £150 million to local charities and voluntary organisations.

Figure 2.5 Luton Rising contributions (FY 2019)

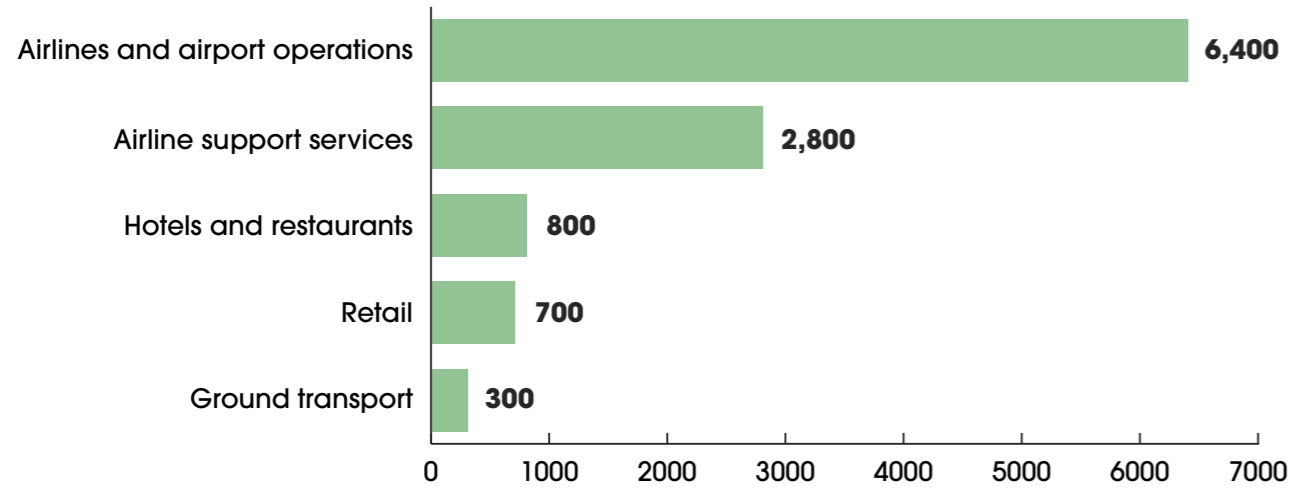


#### The airport supports a critical supply of jobs and economic activity in Luton, the counties of Bedfordshire, Buckinghamshire and Hertfordshire, and beyond.

In 2019, the airport supported over 28,400 jobs (generating £1.8 billion in GDP) across the UK, when its supply chain is included. Over half of these jobs were captured within the 'Three Counties' of Bedfordshire, Buckinghamshire and Hertfordshire, with 10,900 people working at the airport and 16,500 jobs overall within the three counties reliant on the airport. This supported a local economic contribution of £1.1 billion in GDP in 2019.

The airport is a critical part of the Luton economy. Approximately 11,800 jobs were based in Luton, accounting for around 12% of local employment. Of these, approximately 10,900 were employed in activities directly related to airlines and operation of the airport including the head offices of easyJet, TUI, air crew, airport operations and management staff, and other activities located on-site such as airline support services, aircraft maintenance, and hospitality and retail within the terminal building and in local hotels serving the airport.

Figure 2.6 Airport direct employment by activity, 2019

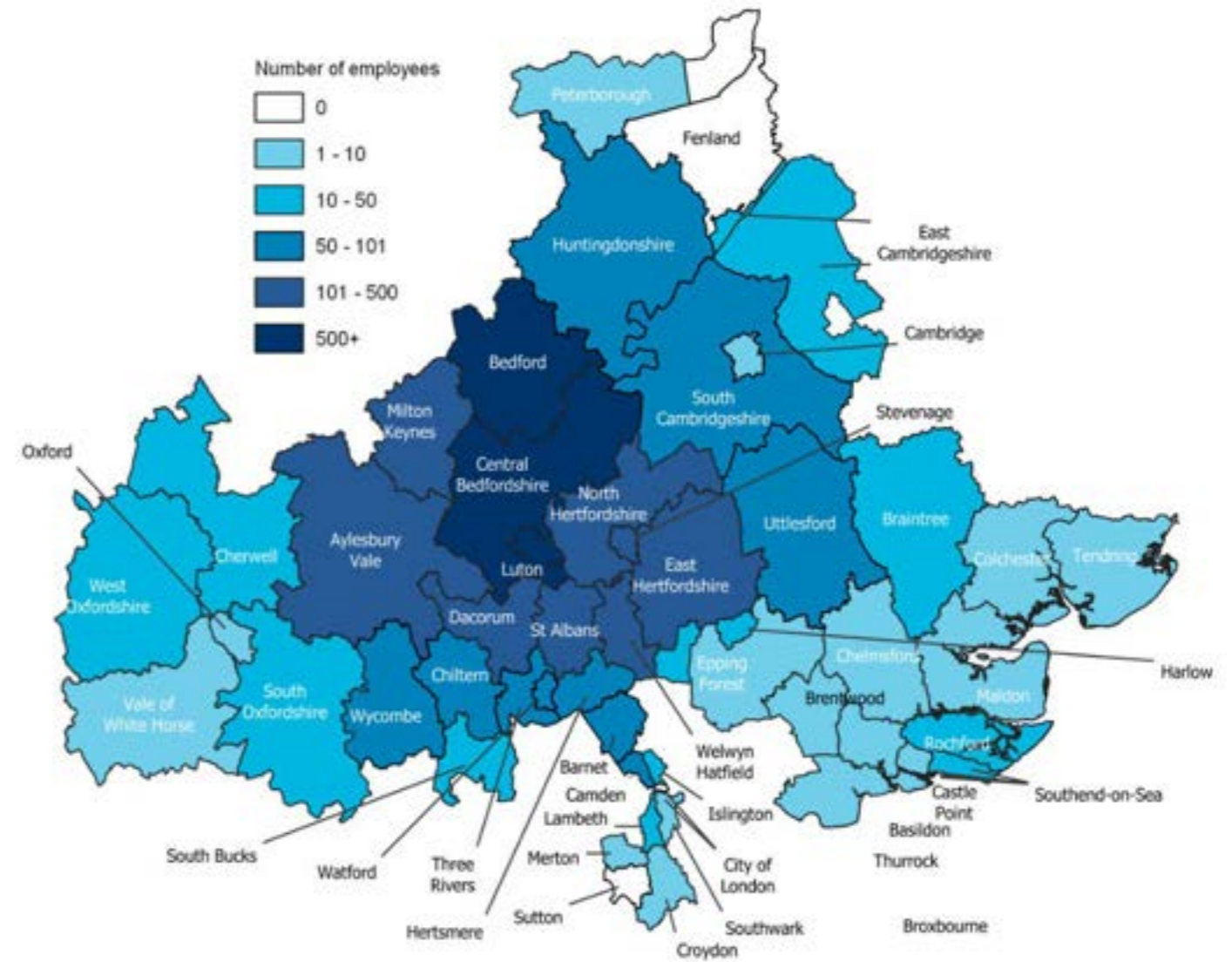


Source: Oxford Economics, November 2021

As the airport operator, LLAOL has committed to be a Real Living Wage employer. As Luton has some of the most deprived wards in the East of England, these jobs are critical to supporting opportunities for the local community and we are working with our partners to ensure job opportunities are prioritised for local people. Currently, approximately 28% of these direct jobs were held by residents of Luton, and a further 30% by residents in the remainder of Bedfordshire.



Figure 2.7 Place of residence of airport employees, 2019



Source: Oxford Economics, November 2021

In addition to jobs supported by airport operations, we are also working to support well-paying opportunities through our assets. The construction of the Luton DART has given opportunities to hundreds of people to develop skills and begin their careers. We are also supporting the delivery of Bartlett Square and New Century Park, which are expected to be home to thousands of jobs when completed.

**Dividends and other payments from Luton Rising are paid to Luton Borough Council, supporting frontline services in the community.**

More than just a major source for employment and economic activity, the airport has a track record as an important source of revenue for Luton Borough Council, our sole shareholder. As a direct result of our public ownership, since 1998 we have provided more than £257 million to support vital local front-line services.

In the 2018/19 financial year, we paid £20.2 million in dividends to Luton Borough Council. In addition, we made other payments, such as rent, interest payments and purchase of services, which added a further £12.3 million to the Council's revenue. The contributions from the airport exceeded those from central government in supporting frontline services and have helped support the work of the Council without the need to raise council taxes.

With our revenue contributions, we are committed to helping Luton Borough Council deliver on the Luton 2040 Vision, which has the primary priority of eradicating poverty locally, and aims to bring inclusive economic and employment growth to support improved life chances, prosperity, health and wellbeing for all residents. The Luton 2040 strategy has already secured developments exceeding £1.5 billion in value and aims to achieve £4.5 billion of inward investment over the next 20 years.

**On top of that, we take our social responsibilities seriously and contribute to local good causes through our community funding programme. Since 2002, we have provided more than £150 million to local charities and voluntary organisations.**

As the UK's only major airport wholly owned by the local council, we are committed to reinvesting the benefits of growth back into the community. On top of dividends returned to our shareholder Luton Borough Council, we have provided more than £150 million to local charities and voluntary organisations since 2002.

In the 2018/19 financial year, we allocated just over £9 million to our community funding programme. When the Covid-19 pandemic impacted operations and revenues, we borrowed funds to maintain our contribution levels to local charities, understanding the greater need within the community.

In 2021, our unique community investment programme had an annual budget of around £7.4 million, with approximately half funding Active Luton (leisure services) and The Culture Trust Luton (arts, cultural, heritage and library services). About 50 local charities are also supported, including Alzheimer's Society, Age Concern, Autism Bedfordshire, Luton Citizen's Advice Bureau, Luton Foodbank, Headway, Luton Women's Aid, Relate, Stepping Stones, The Prince's Trust and Victim Support.

In addition to our funding contributions, we are also developing a new skills, innovation, and business hub, named Morton House in commemoration of Luton Town Football Club player Bob Morton. We have acquired a four-storey building in Kimpton Road, which is expected to open in 2022 with office spaces aimed at attracting businesses and start-up companies and a training and skills hub led by Luton Borough Council focused on technical and social skills.

## What benefits can we contribute with expansion?

The airport plays a role both as an international transport hub that forms a critical part of the UK's national infrastructure, as well as a major local employer with a deep history of commitments in Luton (and the surrounding counties).

Expanding capacity at the airport will generate many types of benefits. As the UK's only airport wholly owned by the local authority, we are committed to ensuring the benefits realised are shared with the communities that are impacted by operations.

- **Expansion will support thousands of new job opportunities and significant economic activity for Luton, the counties of Bedfordshire, Buckinghamshire and Hertfordshire, and beyond.**
- Improving air connectivity is a crucial aspect in ensuring that the UK remains competitive globally, generating benefits to users and the wider economy.
- We will share the revenue gains from expansion with the community, maintaining our long track record of commitments to local charities and growing future contributions.

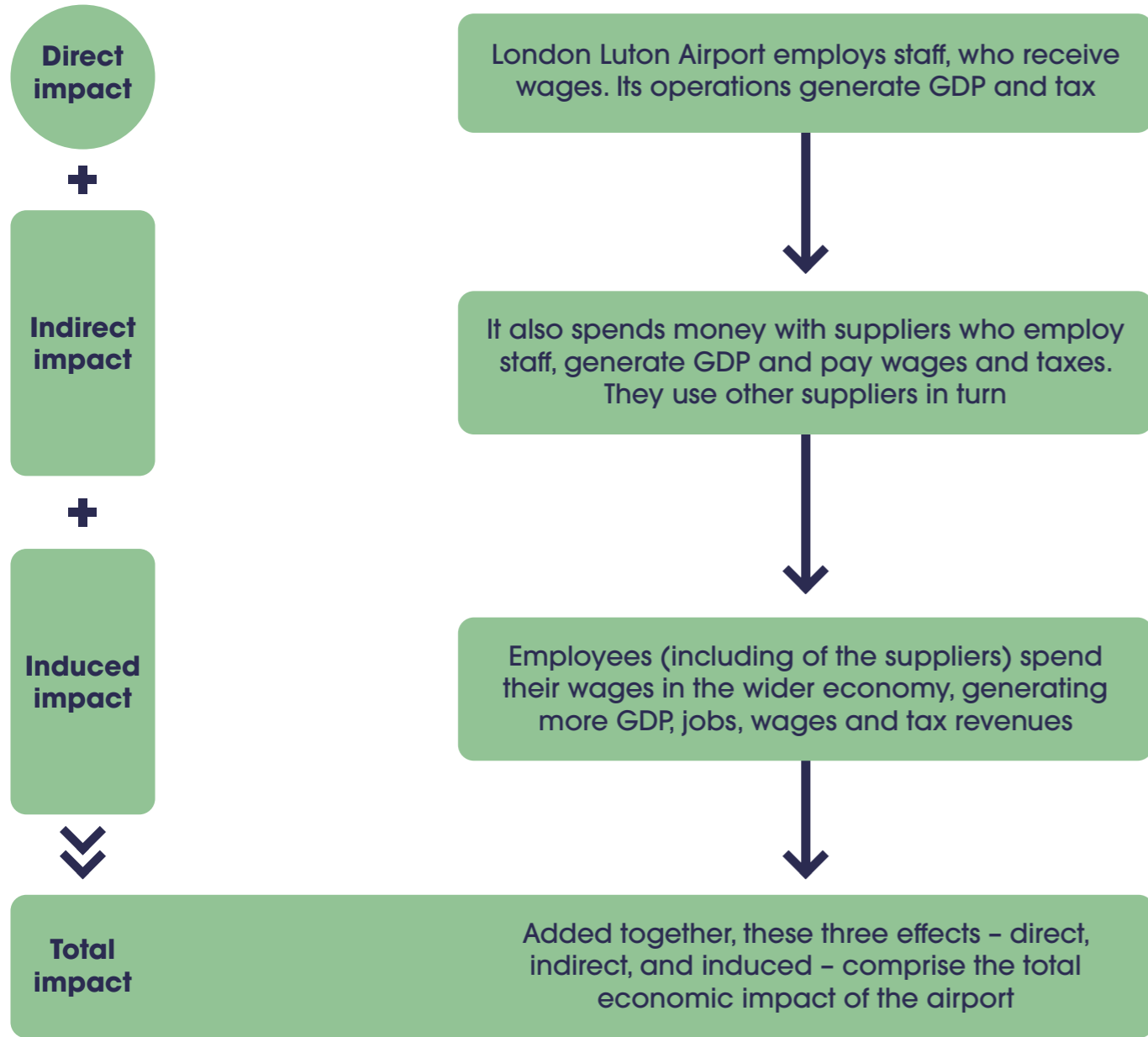
**Expansion will support thousands of new job opportunities and significant economic activity for Luton, the counties of Bedfordshire, Buckinghamshire and Hertfordshire, and beyond.**

The airport is a major provider of jobs in Luton, and expansion is expected to offer substantial growth in employment benefits and a substantially enhanced contribution to local GDP. This impact includes:

- 1) **Jobs directly related to the airport (direct impacts)**
- 2) **Jobs supported through its supply chain (indirect impacts)**
- 3) **Further jobs as those in employment spend money locally (induced impacts)**

The airport also contributes to wider economic growth through the connectivity it provides which acts as an attractor to other businesses to locate in the area.

Figure 2.8 Economic impacts



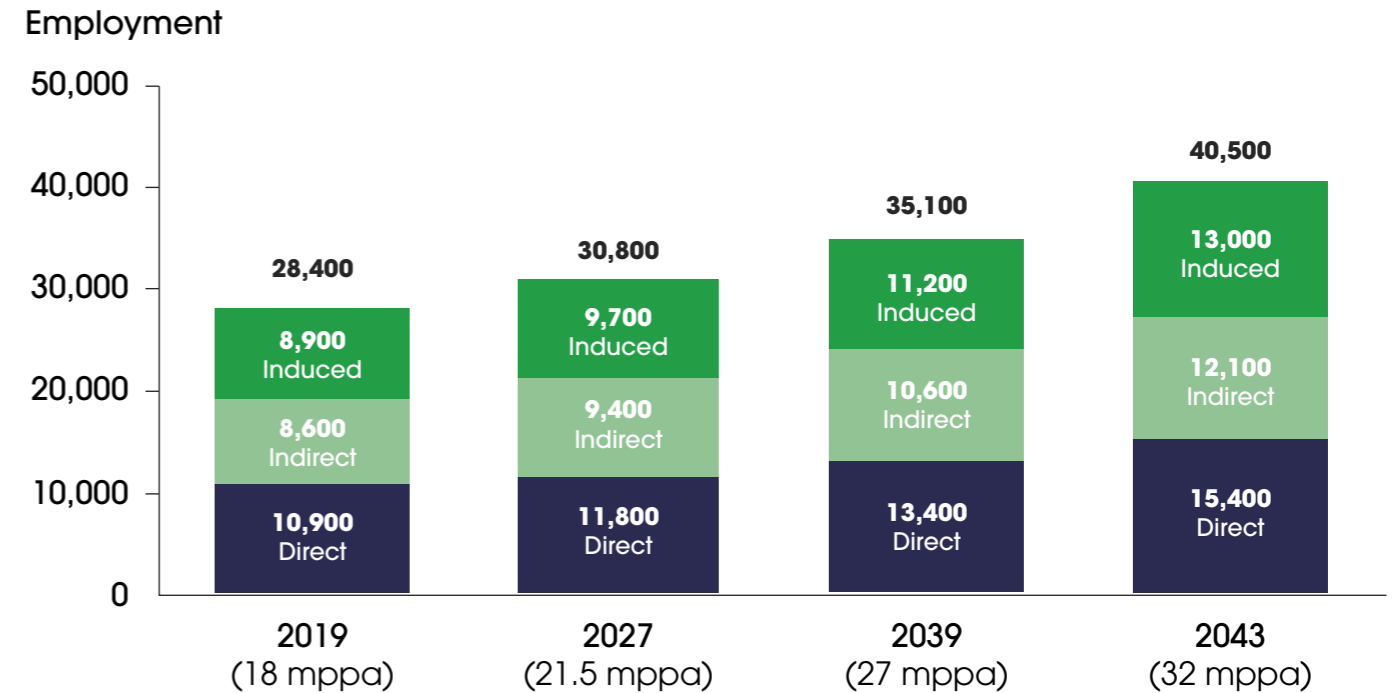
Source: Oxford Economics, November 2021

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 approximately 4,500 by the time the airport is handling 32 mppa, up from 10,900 in 2019.

When indirect and induced jobs are considered, the total number of new jobs would be approximately 4,800 in Luton, 6,600 in the counties of Bedfordshire, Buckinghamshire and Hertfordshire, 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,

approximately £1 billion in total would be realised within the Three Counties, of which nearly £0.8 billion would be realised in Luton through the direct operation of the airport albeit the effects would spread more widely across the Three Counties based on where employees at the airport live.

Figure 2.9 Forecast Employment Growth across the UK



Source: Oxford Economics  
 Figures may not add due to rounding.

In addition to the new jobs supported by expanded operations of the airport, there will also be jobs supported through construction activities. It is estimated that over the construction period a total of approximately 620 full-time equivalent jobs would be directly supported. In addition, approximately 310 full-time equivalent jobs would be supported by indirect and induced employment.

We are committed to ensuring that future jobs created at the airport will offer opportunities for the local community. The expansion scheme will include provision for contracts to include a target for local employment, in addition to existing agreements with our partners to recruit locally. Through the opportunities supported by the expansion proposals, we will work with Luton Borough Council to lead the way to make Luton a real living wage town so working people do not struggle. This includes requirements for those employed in the delivery of the expansion plans at the airport to be paid a real living wage.

Moreover, we will do our part in helping to prepare the local community to take advantage of new job and training opportunities. As discussed in our **Draft Employment and Training Strategy**, we are proposing actions and initiatives with a vision to create quality careers and make the airport and inclusive and aspirational place to work. These proposals include establishing

an employment and skills hub at the airport as a one-stop shop for engagement with local education institutions and training providers, exploring the creation of an onsite training centre for construction and operation phases, encouraging hiring of apprentices and trainees through procurement and working together with airport employers, enhancing outreach with local community groups and schools, and facilitating research and innovation related to the future of sustainable aviation and construction.

**Improving air connectivity is a crucial aspect in ensuring that the UK remains competitive globally, generating benefits to users and the wider economy.**

As recently as July 2021, the government, in the introduction of its consultation on how to achieve Jet Zero, made clear that aviation is at the heart of the UK's economic success, being vital for trade and the distribution of goods, creating jobs, connecting friends and family, and – crucially for an island nation – linking the UK to the rest of the world. The government made clear that *“Flight is essential for our Global Britain ambitions of openness as a society and an economy.”* Improving air connectivity is a key part of making sure that the UK remains competitive globally, as has long been recognised by government. This applies locally as much as nationally. The further development of the airport will strongly support these goals, enabling more people to travel from their local airport, to reach a greater range of destinations for both business and leisure travel.

Therefore, as well as creating employment and economic benefits locally through its operation, the airport also provides connectivity benefits, making the area more attractive for businesses to locate within the area. This is particularly relevant to supporting the economic ambitions of Luton Borough Council and the wider Oxford-Cambridge Arc. By offering a wider range of air service connections, including to key business destinations, expansion of the airport will improve the attractiveness of the area to locate new and expand existing businesses, creating further employment opportunities and wider economic benefit.

In addition to creating employment and economic activity through operations of the airport, expansion generates wider benefits associated with increased connectivity.

- **Giving people living nearby the opportunity to fly from the airport to a wider range of destinations will save time and money for passengers amounting to around £487 million in journey time savings (discounted over a 60 year period) for air travellers to and from the Three Counties area, if the airport is able to expand in line with our plans. Users will also benefit from enhanced passenger facilities and an easier transit through the airport over the longer term.**
- **Productivity growth is positively affected by enabling increased business travel, which in turn supports greater trade and helps secure investment. This beneficial effect is expected to increase the GDP in the Three Counties region by £235 million per year by 2043.**

- **Further growth at the airport will also bring more visitors to the areas around the airport, supporting the tourism economy and generating increased GDP and more jobs (13% of jobs in Luton currently are in the tourism sector). By 2043, inbound tourist activity via the airport could be supporting around £150 million in GDP each year across the Three Counties area and around 2,030 jobs in the tourism sector.**

Overall growth at the airport is expected to make the area more attractive to business more generally and support broader initiatives to attract innovative new industries which are likely to be more reliant on international opportunities to trade. Growth of services from the airport will also provide more opportunities for local residents to visit friends and relatives and to travel abroad more generally in line with the government's objectives.

**We will share the revenue gains from expansion with the community, maintaining our long track record of commitments to local charities and growing future contributions.**

We have a history of investing into the local community – since 1998 we have provided more than £257 million to support local front-line services of Luton Borough Council, together with an additional £155 million for community investment projects and local charities.

Because we are wholly owned by Luton Borough Council, revenues gained from expansion will continue to flow back to our sole shareholder through dividends, contributing to frontline services and priorities envisioned in the Council's Luton 2040 strategy. We are also committed to continue to fund our community funding programme for local charities.

### Community First

We take our social and environmental responsibilities very seriously. Whilst we recognise that the airport contributes to the wider economic and social wellbeing of the region, we also understand that more can always be done to help tackle deprivation wherever it exists, and to assist the challenge to decarbonise our environment.

In our last statutory consultation in 2019 we set out how we wanted to go further than simply mitigating the negative effects of expansion and proposed a new fund which we called FIRST. The aim of this fund was to share the benefits of airport growth by distributing funds amongst neighbouring local authorities for them to use for projects related to either: Community, Environment, or Access.

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'.

In order to maximise independence and transparency, we propose that the fund should be independently administered. We believe the best way to do this would be to make it available to community groups and town and parish councils through our existing independently administered Community Funding Programme.

### Funding Community First

We propose that Community First will provide £1 in funding for every additional passenger above the passenger cap at the time that our application for development consent is approved. This is in addition to our existing Community Funding Programme which will continue. As the Community First fund will scale with growth, the size of the fund is expected to represent a substantial increase compared to the current Community Funding Programme by the time the airport reaches 32 mppa.

Community First will be funded through additional revenues to Luton Rising resulting directly from expansion. This will be taken from our revenue and will not have any direct impact on charges at the airport.

To share benefits beyond our Luton home we propose to put 40% of the proceeds of Community First into the Near Neighbour Fund. The Near Neighbour Fund is that part of our Community Funding Programme which exists exclusively to provide grants to recipients in areas outside of Luton which are most affected by airport operations.

The remaining 60% of the proceeds of Community First will be made available to support areas of high deprivation and decarbonisation projects in our home town, which has some of the most deprived areas within the East of England.

The Community First fund has the potential to raise up to £13 million per year in total (being the difference between the 32 mppa passenger cap sought through the DCO and the recent planning authority resolution to increase the current cap to 19 mppa). The share of this channelled into increasing our Near Neighbour Fund would be more than two hundred times greater than the value of that fund in 2021/22.

### Eligibility and duration

The Near Neighbour Fund currently covers Central Bedfordshire, North Hertfordshire, St Albans, Dacorum, Stevenage and eastern parts of the former Aylesbury Vale district. Beyond the area covered by the Near Neighbour Fund, the FIRST proposal that we consulted on in 2019 also covered Welwyn, Hatfield and those parts of East Hertfordshire which are under the airport's flightpaths. To ensure that the communities included in our earlier proposals are still able to benefit from the changes now proposed, we will extend the area covered by the Near Neighbour Fund to include Welwyn, Hatfield and those areas of East Hertfordshire beneath the airport's flightpaths. Doing this means that the area covered by Community First would be the same as the area covered by our 2019 proposal.

We will make the funds from Community First available to registered charities, community groups, and parish and town councils within these areas. Doing this means that funds will be available at the closest source possible to areas of need. We will provide support wherever needed to small groups who may need assistance in preparing bids for funding.

Bids for funding must demonstrate a clear link to addressing local needs in areas of high deprivation or to decarbonisation projects anywhere within the eligible areas.

Community First will commence as soon as the airport exceeds its permitted capacity limit following approval of our application for development consent. In practical terms it is possible that it will be more efficient for awards to be available in the first financial year following the point at which Community First is triggered. If this is the case then any funds due from the activation of the fund will be carried forwards.

Community First is intended to be an ongoing fund but will be subject to periodic review to ensure that it remains relevant and up to date as time progresses.



# 03 Our proposals

## Overview

In this section we set out our proposals for expanding the airport. Our proposals for getting to and from the airport are set out in more detail in section 4.

The proposed development boundary for our application for development consent incorporates the airport itself together with the proposed area of new landscaping and public open space, car parks and off-site highway improvements.

In preparing our proposals, we have sought to achieve the following goals:

- Make best use of the existing runway to accommodate increasing demand in accordance with aviation policy and Green Controlled Growth described further in this section
- Enhance the existing airport facilities rather than replace them
- Increase capacity for commercial passengers to 32 mppa, while also continuing to provide capacity for business aviation
- Be a good neighbour, by minimising and mitigating environmental impacts, including air pollution and noise, in line with our commitment to responsible and sustainable development
- Provide at least 10% biodiversity net gain\*
- Enhance and encourage at least 45% of passenger journeys to the airport to use public and sustainable transport as an alternative to private vehicles by a target date of 2039
- Maintain as much of Wigmore Valley Park as we can, and provide at least 10% more public open space than currently exists
- Minimise disruption during construction to the existing airport and local infrastructure
- Maximise benefits to the local and sub-regional economy
- Enable the airport to handle flights to longer-haul destinations
- Maintain the airport as an important site for aircraft maintenance and repair
- Retain existing cargo operations, subject to limitations on night-time aircraft noise
- Deliver best value, improved facilities and good levels of service to cater for the diverse and wide-ranging needs of all users of our airport
- Phase development to deliver additional capacity to respond to growth in demand in two phases related to increasing capacity at the existing terminal (Phase 1), and the construction of the new Terminal 2 (Phase 2), as described in section 5 of this brochure

**\*Biodiversity net gain is an approach which aims to leave the natural environment in a measurably better state than it was before.**

Our proposals will be designed to be as sustainable as possible following the Green Controlled Growth initiative described in this section, minimising negative impacts on the environment wherever we can. Specific measures include:

- Supporting the fullest possible use of sustainable transport
- Securing the most efficient use of energy, a reduction in emissions, and a minimal carbon footprint
- Developing a drainage strategy to prevent water pollution, real-time monitoring of pollution levels and new treatment facilities
- Minimising vulnerability to climate change and increased rainfall through our surface water strategy
- Using electric vehicles both airside and landside
- Providing high quality public open space
- Setting targets to meet our carbon objectives
- Delivering sustainable waste management
- Incorporating rainwater harvesting and grey water recycling
- Ensuring the proposals safeguard the ability to adapt to changes in aircraft fuel technologies to deliver a shift away from fossil fuels

**Please note that all plans and figures in this brochure are indicative only and may change as we develop our proposals.**

The permitted capacity of the airport is currently 18 mppa<sup>3</sup>. The technical work underpinning our current development proposals shows that we can carry out a phased increase in the airport's capacity to handle 32 mppa.

### Why 32 mppa?

During the options development stage, we considered options that would have supported expansion up to 36-38 mppa. However, following the response to our non-statutory consultation in 2018 and further assessment work, we progressed with an option that would only expand the airport's capacity up to 32 mppa at this time. The main reasons for this are that there would not have been enough capacity on the road network to support the higher number of passengers and it would have meant more development within the Green Belt, which we wanted to avoid.

### Key changes to our proposals since 2019

The feedback we received during our previous consultation in 2019, along with the impact that Covid-19 has had on the aviation industry, led us to undertake an extensive and in-depth review of our proposals. Following this review, we have made some important changes.

The changes include:

- Inclusion of a new Airport Access Road and improvements to the Airport Way/Percival Way junction as part of our application for development consent, which changes the development boundary for the application

<sup>3</sup> 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.

- A range of sustainability design measures, including additional solar energy production and water efficiency measures
- Improvements to the replacement open space for Wigmore Valley Park to protect more valued existing habitat and landscape features, provide improved enclosure and screening to development at the airport, improve connectivity to the existing parkland areas to be retained, and to reposition it nearer to the community it serves
- Reducing the size of the platform needed to bring the expanded airport level with the runway, meaning a reduction in earthworks (engineering works involving moving and excavating earth). Compared to the scheme we previously consulted upon the scale of the reduction in earthworks to build the platform is equivalent to two Wembley Stadiums
- Reconfiguring taxiways, reducing aircraft parking stands, and re-positioning the engine run-up bay with noise barriers
- Reducing the footprint of the car parking
- A new approach to managing the potential effects of future expansion, called Green Controlled Growth – details about this can be found on page 49

### Phasing

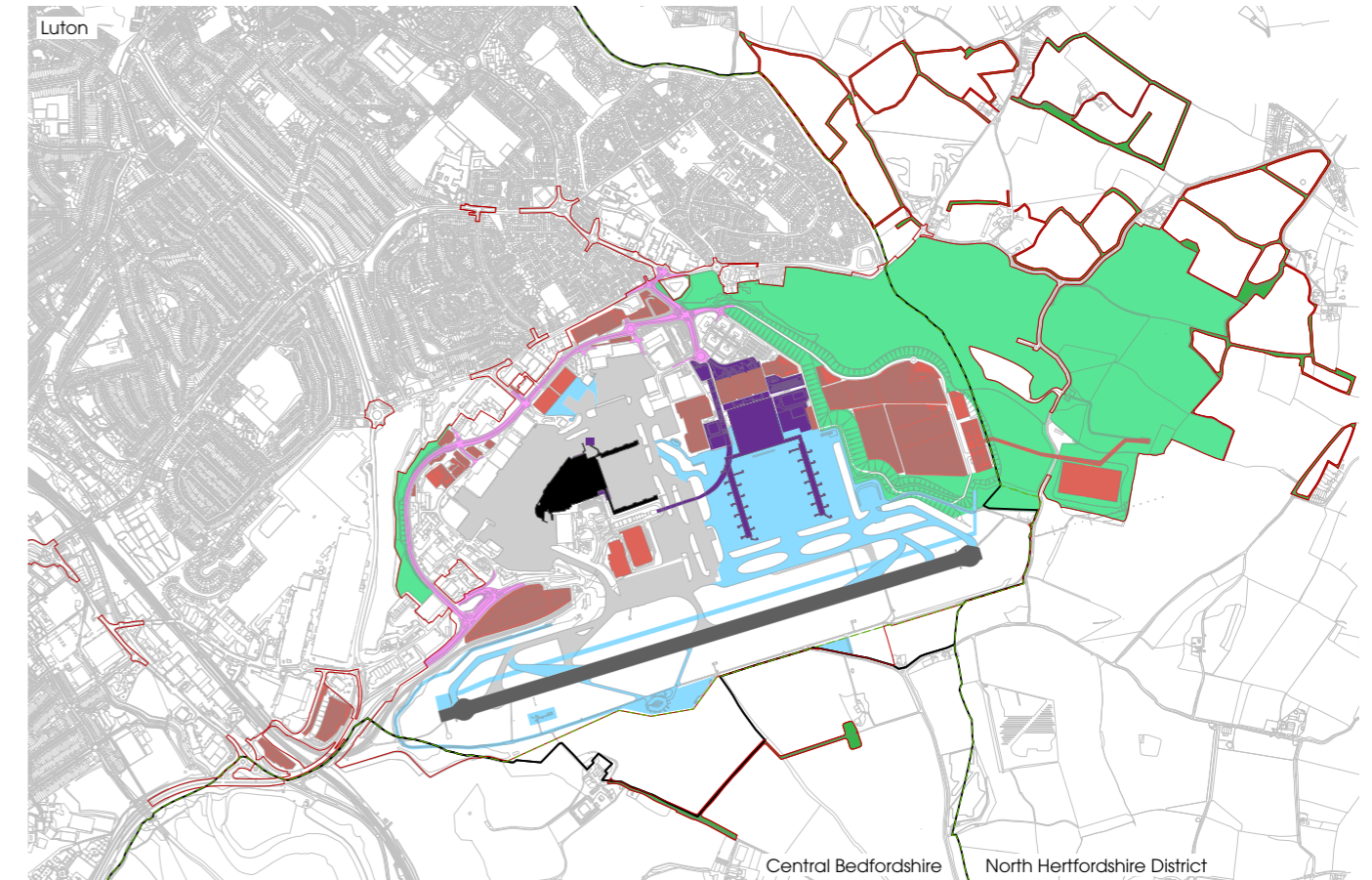
The scheme will deliver additional capacity in two works phases related to increasing capacity at the existing terminal (Phase 1), and the construction of Terminal 2 (Phase 2). However, for the purposes of our assessment work three phases are considered, as follows:

- **Phase 1: Expansion of Terminal 1 and associated facilities to increase capacity from currently consented capacity to approximately 21.5 mppa.**
- **Phase 2a: Construction of new Terminal 2 and associated facilities to increase airport capacity from 21.5 mppa to 27 mppa.**
- **Phase 2b: Further expansion of Terminal 2 and associated facilities to increase from 27 mppa to 32 mppa.**

You can read more about the phasing for the construction of the scheme in section 5 of this brochure.



Figure 3.1 Proposed indicative layout for the scheme



**KEY**

- Proposed Development Boundary
- Local Authority Boundary
- Green Belt Boundary
- Existing Runway
- Terminal 1
- Existing apron/taxiways/links
- Proposed apron/taxiways/links and airport equipment
- Proposed terminal and associated works
- Proposed airport support facilities and carparks
- Proposed onsite highways works
- Proposed replacement open space and landscape mitigation

### Green Controlled Growth

We take our environmental responsibilities incredibly seriously. In support of our application for development consent, we are carrying out a thorough and robust assessment of the environmental impacts of expansion using the best available data and modelling techniques. This is referred to as an Environmental Impact Assessment, the outputs of which will be captured in an Environmental Statement.

We are proposing to build on this by introducing a unique and ground-breaking initiative which we call Green Controlled Growth (GCG).

GCG is a new, environmentally-focused approach to managing growth at the airport. It will introduce binding limits for the airport's noise, carbon, air quality and surface access impacts. We selected these impacts because these are the areas where, as the airport grows over time, there is most scope for impacts to increase in line with growth. Crucially, these environmental limits are not airy aspirations, but would be legally binding. Assessing whether limits are being breached will be carried out by an independent body.

GCG includes ongoing monitoring of these impacts and regular public reporting. If monitoring were to suggest at any point that these limits were in danger of being breached, then plans must set out how that breach would be avoided. If environmental limits were ultimately breached, further growth would be stopped, and mitigation required.

Figure 3.2 Environmental impacts addressed by GCG



The GCG limits will also include a robust system of governance and independent oversight to ensure that performance against the environmental limits is properly monitored and managed. We will set up a new body, independent of Luton Rising, to hold the airport operator to account and ensure that appropriate action is taken based on the results of monitoring.

We believe GCG would be one of the most far-reaching commitments to the sustainable operation of an airport ever to be introduced in the UK.

You can read more about this in our **Draft Green Controlled Growth Proposals** document.

## Airfield

The main airfield elements of our proposal are:

- A new second taxiway parallel to the runway at its eastern end together with extensions to the existing parallel taxiway allowing more efficient taxiing and manoeuvring of aircraft, optimising the overall capacity of the runway. This will reduce aircraft ground noise and reduce greenhouse gas and NO<sub>2</sub> emissions from the aircraft.
- New apron areas to accommodate additional aircraft stands, located adjacent to terminal areas, including necessary services such as floodlighting to ensure safe operations.
- Additional taxiway links connecting the runway to the taxiways and in turn to the new apron to reduce taxiing distances and queuing.
- Aircraft ground handling and vehicle holding facilities to serve airfield operations including electric vehicle charging areas.
- Substations, including standby generators.
- Relocation of the Fire Training Ground to the south of the runway to provide space for the proposed apron.
- Provision of a new engine ground running bay (to test aircraft engines after maintenance) with modern acoustic barriers. This new facility is required as the existing facility is located within the site of the proposed apron.
- Provision of a location to isolate an aircraft (safe aircraft separation from other airport activities).
- An additional surface movement radar to maintain safety and monitoring of aircraft taxiing during periods of low visibility given the increased airport footprint.

The principles followed for the design of the expanded airfield meet international standards and will allow us to construct the facilities in phases to support operational need and demand.

The overall layout of the airfield has been optimised to minimise land take. Nonetheless, account has been taken of the operational interfaces with the existing airfield and, to the extent possible, the strategy will be to construct most of the works outside the current airfield to minimise impacts on operations during construction.

For more information on the airfield scheme development, please refer to **Chapter 4 of the PEIR** and the **Works Description Report**.

Figure 3.3 Proposed airfield layout



#### KEY

— Proposed Development Boundary

— Local Authority Boundary

— Green Belt Boundary

■ Terminal 1

■ Existing apron/taxiways/links

■ Proposed Terminal 1 and Terminal 2

■ Proposed apron/taxiways/links

■ Proposed Engine Run-up Bay

■ Proposed Fire Training Ground

## Changes to existing terminal

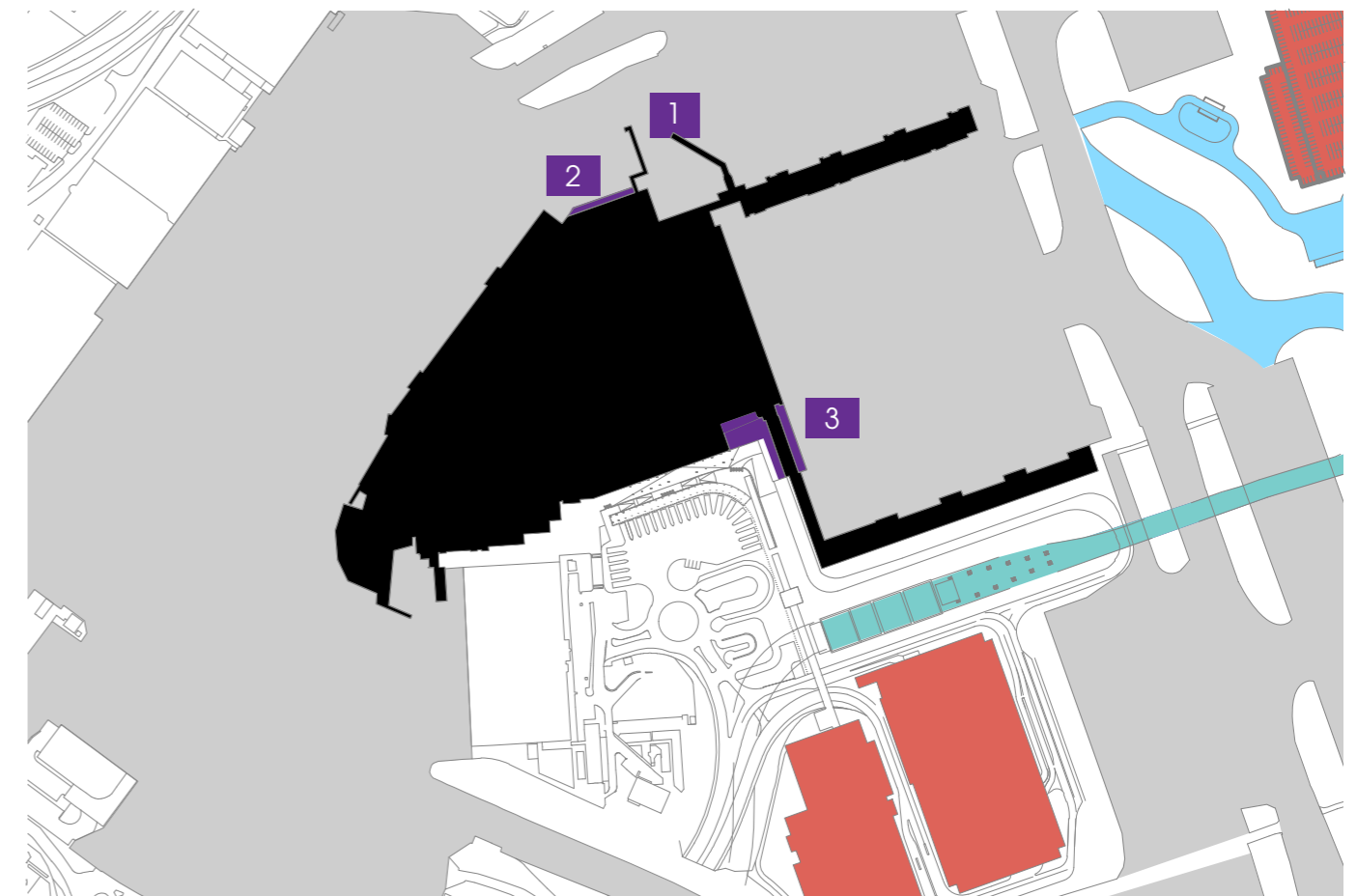
To accommodate the forecast passenger demand in the first phase of development (up to 21.5 mppa), our proposals include new facilities and extensions to increase the capacity of the existing terminal building. A set of potential solutions have been assessed in order to define the best way to accommodate the future demand at Terminal 1.

The following extensions have been assessed in the PEIR. However, these may be adapted and refined to meet future operational needs, dependent on how the demand evolves over the next few years. Should alternative options be adopted, the location, scale and nature of the extensions will be similar to those described and are not considered to give rise to materially different effects to those reported in the PEIR. Additionally, any remodelling works to increase the capacity of key facilities such as check-in, security check point, outbound baggage system, and inbound baggage system would not require additional buildings and would be delivered within the existing terminal.










- An extension of the current building to the north (ground floor only) to increase the existing passenger queuing area at Immigration, including remodelling and optimising the layout of desks and e-gates.
- An extension of the existing building to the south side is proposed to increase the terminal area at both ground and first floor levels. At ground floor level, this would provide additional space for key facilities such as security search and check-in. At the first floor level, the additional area would provide additional space for the departure lounge to increase the provision of seating for departing passengers. Other options provide additional departure gates within the existing terminal building by optimising and extending the use of some functions of the departure gate areas to the south.
- An increase in the number of departure gates (3 to 4 gates) is required to manage the growth in demand planned in Phase 1. A set of options have been explored to find the best solution which will be defined depending on how the demand in the peak evolves over the next few years. One option is to build a new bussing gate facility external to the existing building in order to operate the departures from the new aircraft stands. Other options provide additional departure gates within the existing terminal building by optimising and extending the use of some functions of the departure gate areas to the south.
- In addition to the proposed extensions to the existing terminal, various terminal areas would be remodelled to increase the capacity of the terminal within the current terminal footprint.

The proposed changes would increase the capacity of the terminal to approximately 21.5 mppa, which would be supported by the early construction of some new stands on the site to be used eventually for Terminal 2.

Figure 3.4 Proposed changes to Terminal 1



### KEY

|   |   |
|---|---|
|  Terminal 1 (T1)           |  Existing apron/taxiways/links                             |
|  Proposed associated works |  Luton DART station  |
|  T1 Temporary bus lounge   |  Proposed airport support facilities including car parking |
|  T1 North extension        |  Proposed apron/taxiways/links                             |
|  T1 South extension        |   |

## New terminal

We are proposing a new terminal (Terminal 2) located to the east of the existing terminal complex. The new terminal would be constructed in phases to match demand.

We envisage the terminal building being:

- A facility of the scale appropriate to handle 12 mppa
- A separate building to minimise disruption to existing operations during construction
- Inclusive of check-in facilities, security, baggage handling, food and beverage, retail, staff welfare etc



- Inclusive of passenger boarding piers compatible with passenger boarding bridges if required by airlines
- Capable of modular and phased construction
- Able to incorporate modern practices in lighting, heating and ventilation to minimise energy use while creating a comfortable experience for passengers and staff
- Provided with onsite renewable energy sources, for example photo-voltaic cells on the terminal roof to generate electricity
- Able to incorporate modern practices for rainwater harvesting to minimise the need to use mains water
- Equipped with sustainable methodologies to minimise the carbon footprint of the new terminal (considering both construction and operation)

The new terminal will require its own dedicated aircraft apron and stands. The proposed new apron area will accommodate 28 aircraft contact stands with direct access from the passenger boarding piers. They will service a range of aircraft, including up to six larger aircraft of wingspan up to 65 metres occupying multiple stands.

Our proposed apron and taxiways have been positioned such that the aircraft taxiing time to the runway is minimised. This will reduce aircraft ground noise and reduce greenhouse gas and NO<sub>2</sub> emissions from the aircraft.

New support facilities would include:

- Operational support accommodation and airfield security post
- Aircraft maintenance hangars
- Fuel storage facility (pages 67-69)
- Luton DART extension
- Forecourt and coach station

## Public transport

### Luton DART and rail access

Terminal 2 would be connected to Luton Airport Parkway station, with a new station for the Luton DART passenger transit service (expected to open in 2022). We are proposing to extend the Luton DART from the existing terminal to Terminal 2, to provide passengers with a quick and reliable choice of public transport.



### Forecourt and coach station

A new forecourt area with passenger pick-up/drop-off and eight bus stands would serve the new terminal.

It has been designed to cater for the airport's busiest hours and accommodate pick-up/drop-off, taxis, local buses and shuttlebuses. The design is based on the principle of private car drop-off activity taking place at ground level, with a short-stay multi-storey car park located directly above for pick-up activity. It is anticipated payment would be required for drop-off activity and this may include differential pricing related to a vehicle's carbon emissions.

Taxis and buses would be located on the southern aisles of the forecourt, closest to the terminal building, allowing taxi and bus passengers to directly access the terminal.

A separate coach station would be located to the immediate east of the forecourt, which would serve longer distance coach services.

Figure 3.5 Proposed public transport facilities at Terminal 2



**KEY**

|                             |                              |   |                               |
|-----------------------------|------------------------------|---|-------------------------------|
| Proposed Terminal 2         | Proposed T2 associated works | Proposed airport support facilities and car parking | Proposed apron/taxiways/links |
| Proposed Luton DART station | Proposed coach station       |   |                               |

### Car parking

Our goal is for at least 45% of passenger journeys to and from the airport to be made by public transport and other sustainable travel methods, and we have calculated our required car parking numbers on this basis.

We are considering including a road charging strategy for airport roads within our application for development consent.

To meet the anticipated parking requirements at 21.5 mppa the majority of the existing parking provision will be retained, including the existing multi-storey car park facilities at Terminal 1, a reconfigured long-stay car park and the mid-stay car park on Airport Approach Road. New areas of surface level car parking would also be provided adjacent to the proposed Terminal 2 site, which would be upgraded to a multi-storey car park at 32 mppa.

The existing mid-stay and the replacement long-stay car parks will still require shuttle buses.

For the expanded 32 mppa airport, figure 4.2 on page 75 shows the proposed location of the short, mid-stay and long-stay car parks. Further information about the phasing of these facilities is contained in section 6 of this brochure. Staff parking is proposed to be accommodated within a decked car park on the site of the existing staff car park and car hire centre, located to the north of Percival Way. Additional provision for dedicated airport employee parking would be made within the proposed car parks near Luton Airport Parkway station.

It is anticipated that drivers parking in the employee car parks adjacent to Luton Airport Parkway would be able to use the Luton DART to reach both terminals.

Table 3.1 Proposed number of parking spaces

| Parking Type           | Number of Parking Spaces |               |               |
|------------------------|--------------------------|---------------|---------------|
|                        | 21.5 mppa                | 27 mppa       | 32 mppa       |
| Short Stay             | 4,150                    | 4,800         | 5,800         |
| Mid Stay               | 2,600                    | 3,000         | 3,650         |
| Long Stay              | 4,675                    | 5,400         | 6,550         |
| Employee               | 4,400                    | 4,900         | 5,200         |
| Car Hire               | 500                      | 600           | 700           |
| Valet Pick Up/Drop Off | 75                       | 100           | 125           |
| <b>Total</b>           | <b>16,400</b>            | <b>18,800</b> | <b>22,025</b> |

### Landscape

Our proposals would change the landscape that surrounds the airport, impacting on public access, land use, land cover and landform. We have sought to make our proposals sympathetic to the surrounding environment and to cause the least damage to valued wildlife habitats, amenity assets and heritage assets, but some adverse impacts would be unavoidable. Further detail about these impacts is provided in section 6 of this brochure.

Our landscape strategy seeks to protect valued assets of the landscape wherever possible, mitigate significant adverse environmental impacts and, wherever possible, to introduce positive changes that would help to strengthen the local landscape character and green infrastructure, improve public access to the countryside, and integrate the airport into its surroundings.

Our landscape strategy would increase public open space by at least 10% and would:

- Plant over 10.7 hectares of native broadleaf woodland
- Plant over 1.95 hectares of native scrub vegetation
- Plant or restore over 17.5km of mixed-species hedgerows
- Plant over 1,500 new hedgerow or parkland trees
- Deliver over 37.6 hectares of neutral meadow grassland
- Deliver over 27 hectares of low-intensity grazed grassland
- Deliver over 12.5 hectares of low-intensity grazed calcareous grassland
- Retain, protect and improve the management of over 9.5 hectares of existing woodland vegetation
- Construct over 5km of new surfaced paths or rights of way

Our proposals upgrade several sections of footpaths to multi-user bridleways, and would encourage access to the wider countryside by improving all rights of way within our landholdings, either through surfacing, new signage or improved connectivity.

Our proposals also support our aspiration for the airport to be one of the most sustainable airports in the UK, promoting solutions that:

- Nurture wildlife
- Conserve water and energy
- Reduce soil and water pollution
- Reduce construction waste
- Decrease surface water run-off

The proposals would also deliver a high-quality of public realm that would improve people's experience of using and working at the airport.

You can read more about our landscape proposals in **Chapter 4 of the PEIR** and **Work No. 5 of the Works Description Report**.

## Wigmore Valley Park

We have worked closely with local stakeholders and listened to the feedback expressed by the local community at our previous consultations to ensure that the proposed new open space meets both the construction and operational requirements of the expanded airport as well as local ambitions for this space.



We have made changes to our plans to allow replacement open space to be delivered to serve the existing community. This includes the following benefits:

- **Minimise earthworks activities near the more frequently used parts of the replacement area of parkland**
- **Protect more of the existing scrub and woodland vegetation on Winch Hill**
- **Ensure valued archaeological and habitat features are not be impacted by construction activities**

By delaying works to construct the new terminal we have also allowed landscape mitigation proposed within the replacement open space greater opportunity to establish, improve habitat connectivity, frame people's views and help screen change beyond its limits. Our proposals focus on the establishment of natural habitats, delivering areas of meadow grassland, native shrub planting, broadleaf woodland, and mixed-species hedgerows with hedgerow trees.

In replacing affected open space, we are committed to:

- **Reproviding space that is at least as good in usefulness, attractiveness, quality, accessibility and at least 10% larger than the current provision**
- **Retaining the existing main entrance into Wigmore Valley Park near to Wigmore Hall/Wigmore Pavilion**
- **Working with the respective authorities and stakeholders to determine suitable arrangements and amenity facilities for the replacement open space**
- **Delivering the replacement open space ahead of other works commencing within the existing parkland**
- **Seeking to minimise the duration of any construction activities that may affect open space, and the duration of any temporary areas of open space**
- **Engaging with local stakeholders on the potential for future community stewardship of a new park, overseen by a new Community Trust**

We have already secured planning permission to provide enhanced facilities: an improved skate park and play facilities; an improved Wigmore Pavilion; and better surfaced footpaths. The park would retain many of the mature trees and much of hedgerow vegetation that defines the east and south east boundary of the existing Wigmore Valley Park. It would encompass several other important landscape features within the surrounding area, including a section of mature hedgerow on Winch Hill.

We would also work with local stakeholders to deliver further features to encourage the surrounding community to use, engage with and be active in the park, including picnic areas, provision for dog walking, and opportunities to explore nature to get a multi-sensory experience.

Informed by feedback from this consultation, this could also include further areas for play or exercise.

We have made changes to our plans so that the remains of an existing Romano-British villa can remain in-situ and will not be impacted by construction activities. We have made further changes to other elements of the proposals to avoid disturbance to a badger sett.

New landscaping will improve habitat connectivity, provide visual screening, and frame people's views. Our current development proposals focus on establishing natural habitats, delivering areas of meadow grassland, native shrub planting, broadleaf woodland, and mixed-species hedgerows with hedgerow trees. In the open space east of Winch Hill Lane, a further area of wildflower grassland would be grazed by livestock to control more aggressive plant species and maintain it as a species-rich environment.

Responding to concerns about the maturity and establishment of new vegetation, we have already seeded some areas, and are proposing to seed and plant up other areas ahead of development consent, and to use some larger trees and plants that are in a more advanced stage of growth.

We recognise that further work is needed to address concerns that have been raised previously, and we plan to continue our work with the relevant stakeholders to address these as we take our proposals forward.

Figure 3.6 Proposed landscape plan



## Drainage

Our proposed drainage solution reflects a sustainable approach to water management, including the following:

- Water efficiency measures for the existing and proposed terminals.
- Surface water drains designed to accommodate a 1 in 100-year storm event plus 40% to allow for climate change effects.
- Retaining the seasonal first flush, which operates during high flows to take contaminated surface water via an attenuation tank for treatment through the water treatment plant.
- Live monitoring of chemical loads and contaminated water which will be diverted to the water treatment plant.
- Treating surface water run-off and foul water in a safe and environmentally friendly way.
- Based on sustainable drainage system techniques, two infiltration basins are proposed. Geological data shows that most of the expansion lies on chalk deposits which are relatively permeable and therefore suitable for infiltration.
- Improving the existing drainage infrastructure by diverting the existing flows into a new network that would provide water treatment before discharging to the ground.
- Some of the proposed long stay car park area is proposed to be constructed using permeable paving, providing an opportunity to integrate a Sustainable Drainage System (SuDS).

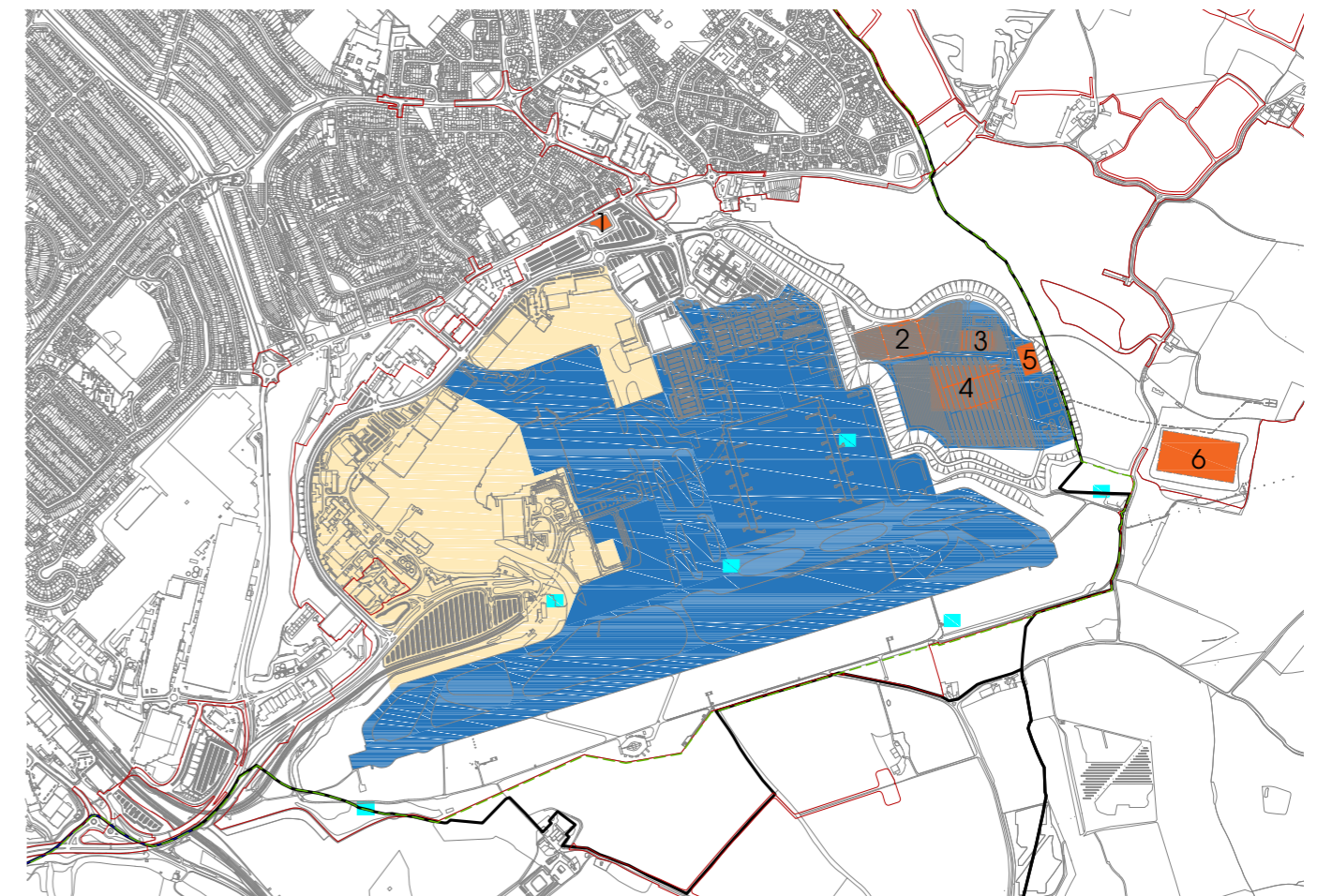
**Infiltration basins store uncontaminated surface water run-off and infiltrate it gradually into the ground.**

The surface water run-off will be continuously monitored for contamination from airport operations such as de-icing agents used in winter or from fuel spills. We will provide full retention interceptors to capture and contain the spread of fuels, oils and other contaminants, which otherwise could become a hazard. If contamination threshold levels are reached, the surface water which would otherwise pass to infiltration basins will be diverted to underground storage tanks prior to treatment at the on-site water treatment plant.

The proposed water treatment plant reflects a sustainable approach to water quality and quantity as it reduces impact on existing water networks. The water from the water treatment plant will be 100% recyclable into non-potable water to be used for irrigation purposes, flushing toilets and other non-potable water needs. Any excess will discharge into an overflow infiltration basin.

100% of the average daily foul water from the new buildings will be treated and recycled through the water treatment plant.

Figure 3.7 Proposed drainage plan



**KEY**

|  |   |                              |
|--|---|------------------------------|
| Proposed Development Boundary  | Proposed airport expansion discharges into new infiltration basin | 4 Underground storage system |
| Local Authority Boundary   | 1 Existing north soakaway   | 5 Water treatment plant      |
| Green Belt Boundary  | 2 Permeable paving storage  | 6 Infiltration basin         |
| Existing airport discharges into Thames Water sewage network and existing north soakaway | 3 Treated foul water tank   | Emergency water supply tanks |

## Utilities

We propose to centralise much of the services infrastructure plant and equipment in energy centres. The new terminal complex will require a range of infrastructure services providing electricity, heating and cooling, ventilation, water, drainage and communications.

Our energy proposals are a key part of our ambition to make the airport one of the most sustainable airports in the UK. The National Infrastructure Commission has set a target for at least 50% of the country's energy to be from renewable sources by 2030. Our aspiration is to secure 100% of electricity from such sources.

Energy efficiency is key to our energy proposals, specifically in determining the principal fuel type and the efficiency of the equipment and building fabric.

In preparing for the airport expansion, overall energy demand is expected to increase from around 6MW (megawatts) to around 23MW with 7MW allocated for Terminal 2 and its apron. The Luton DART will have an increased demand of 6MW when connected to Terminal 2, and the introduction of electric vehicle charging will require a further 4MW.

Electricity will principally be used for:

- **Lighting, heating and cooling**
- **The extension of the electrically powered Luton DART transit system**
- **Powering parked aircraft and a wide range of equipment**
- **Charging electric vehicles for passengers, visitors and airport staff**

The conventional approach to the supply of energy is the use of electricity from the local supply network. We intend to supplement this with:

- **Solar (photo-voltaic cells, built where practical over car parks and on roofs over a period to 2037) – this could ultimately provide up to 20% of annual site demand for electricity**
- **Battery storage for back-up power rather than solely relying on diesel generation**

Also, buildings will be designed to at least BREEAM 'Excellent' and to be energy efficient, with appropriate installations and equipment together with thermally efficient materials and shading.

Given the increased electricity power demands, it will be necessary to upgrade the existing 11kV connection to 33kV within new substation(s).

A traditional approach to heating and cooling assumes that gas boilers and electric chillers will provide and remove heat. We intend to use:

- **Electric reverse heat pumps for our heating and cooling, supported with ground source heat pump technology (using the ground and water storage tanks)**

- **Storage rather than loss of excess heat to atmosphere (using the water storage facilities)**

Whilst the airport will rely on the local water supply network for potable water, we intend to use rainwater and treated water for non-potable use in the buildings (such as flushing toilets) and for fire management and landscape irrigation. This will help to manage the demand on potable water.

New communications connections will be provided underground to relevant buildings from existing infrastructure. These networks will feed into a new energy centre to be located next to the new terminal building. The energy centre will also accommodate much of the primary heating, cooling, ventilating and generating plant. Other buildings will be connected and served locally.

## Fuel

The increased passenger capacity at the airport will require larger fuel storage facilities than are currently available.

Aviation fuel is currently delivered by road tankers to the existing fuel storage facilities which are located to the west of the airport on Percival Way. The fuel is then dispensed into fuel bowsers, which transport the fuel via the airport road network and through a security gate into the airfield and then to the aircraft. The existing fuel storage sites, operated by two fuel companies, will be retained and supplied with fuel from the new fuel storage facility by either tanker or a pipeline. Existing aircraft stands in the Terminal 1 area will continue to be served by fuel bowsers from the existing fuel farm.

A new larger fuel storage facility will be provided to the east of the airport at ground level. Fuel distribution from the new fuel storage facility to the Terminal 2 aircraft stands will be through buried pipes in a fuel hydrant system within the airport boundary.

The fuel storage facility has been sized to ensure adequate capacity for all aircraft operations at both terminals and safeguards the opportunity for fuel to be conveyed from the new facility to the existing fuel tanks, west of the existing terminal, either by an additional pipeline or by bowsers operating within the airport site.

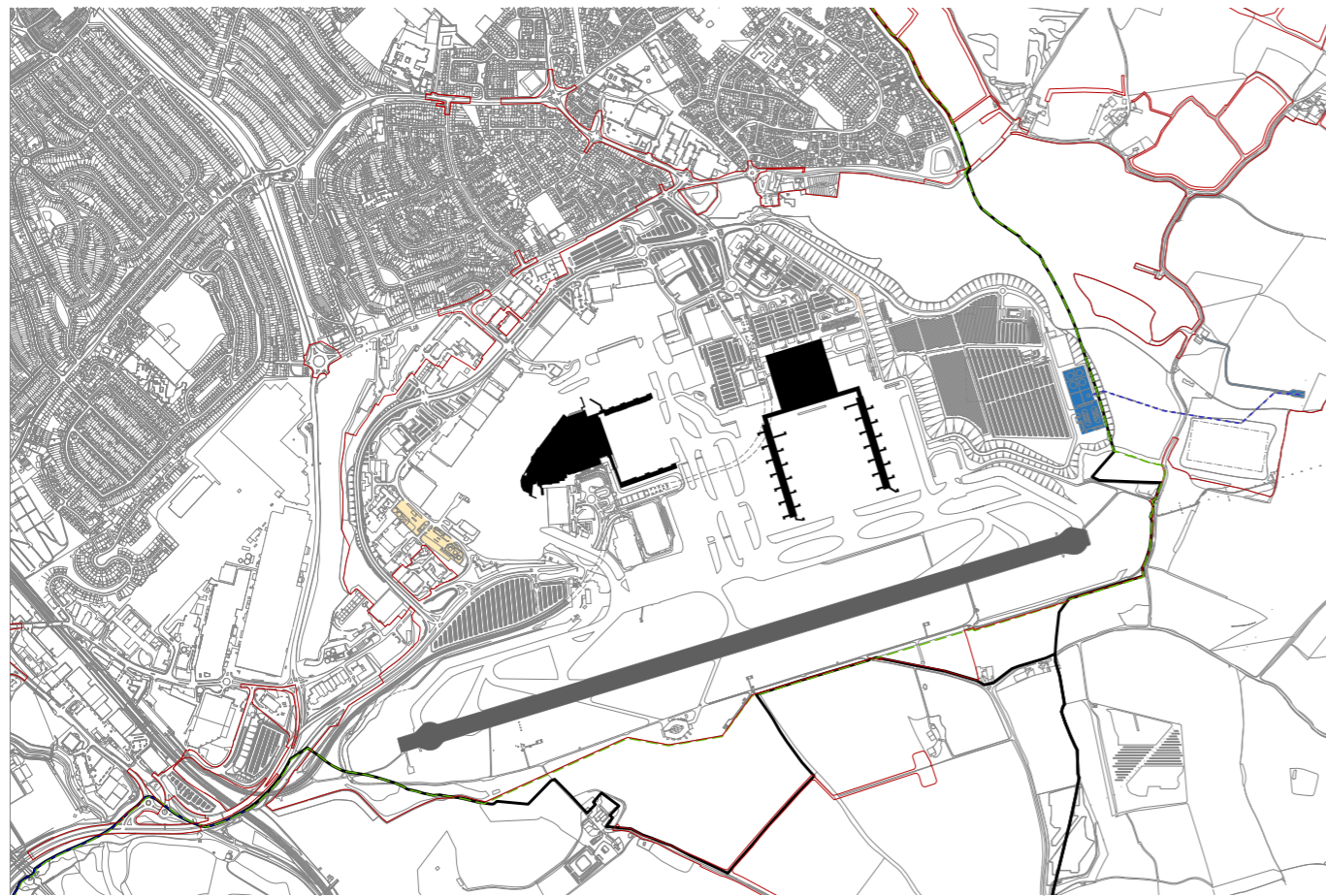
Road access to the new fuel storage facility will be provided, along with an emergency access track from the airside road network for firefighting purposes.

The new fuel storage facility will be designed to rigorous safety standards, with systems to stop the tanks from overfilling and the installation of remotely operated shut off valves in the fuel transfer pipelines and storage tanks.









Our proposals include a piped connection between the new fuel storage facility and an existing national fuel delivery pipeline which is located approximately 500m from the new facility. This will allow aircraft fuel to be piped directly into the airport storage facility for both terminals significantly reducing the number

of road tankers using the local and national highways and reducing traffic congestion and emissions.

Figure 3.8 Proposed fuel storage plan



**KEY**

|  |   |
|--|---|
|  Proposed Development Boundary |  Proposed fuel storage |
|  Local Authority Boundary      |  Terminals             |
|  Green Belt Boundary           |  Existing runway       |
|  Existing fuel storage         |  Proposed fuel line    |

We intend to expand the airport without any substantial building on land designated as Green Belt. The new fuel line connection will pass through Green Belt land and will be buried, representing very limited environmental impact. However, the proposed connection to the national fuel pipeline to the east of the airport will require the construction of a permanent above ground connection facility of approximately 460m<sup>2</sup> with an associated single hard-core access track for maintenance purposes near the point of connection. The national fuel delivery pipeline route passes through the Green Belt, so any connection point needs to be located there.

Justification (called 'very special circumstances' in planning terminology) for this proposed compound within the Green Belt will be demonstrated as part of our application for development consent. This will include measurable operational efficiencies in capacity and safety of fuels supplied direct to the airport. It would also avoid environmental and traffic impacts associated with the alternative of delivery of very large quantities of fuel by road.

The average daily fuel demand for the existing airport is 1,365m<sup>3</sup> to meet the current capacity, which equates to a daily average (not allowing for peak periods) of approximately 76 road tanker movements to the storage facilities. This would increase to a daily average of 136 tanker movements to meet the 32 mppa capacity if all the fuel were to be delivered by road. The proposed new fuel storage facility and connection to the fuel pipeline would enable the opportunity to significantly reduce delivery by road vehicles as the existing fuel facility could be supplied from the new by means of be short journeys between the two fuel facilities, within the airport boundary.

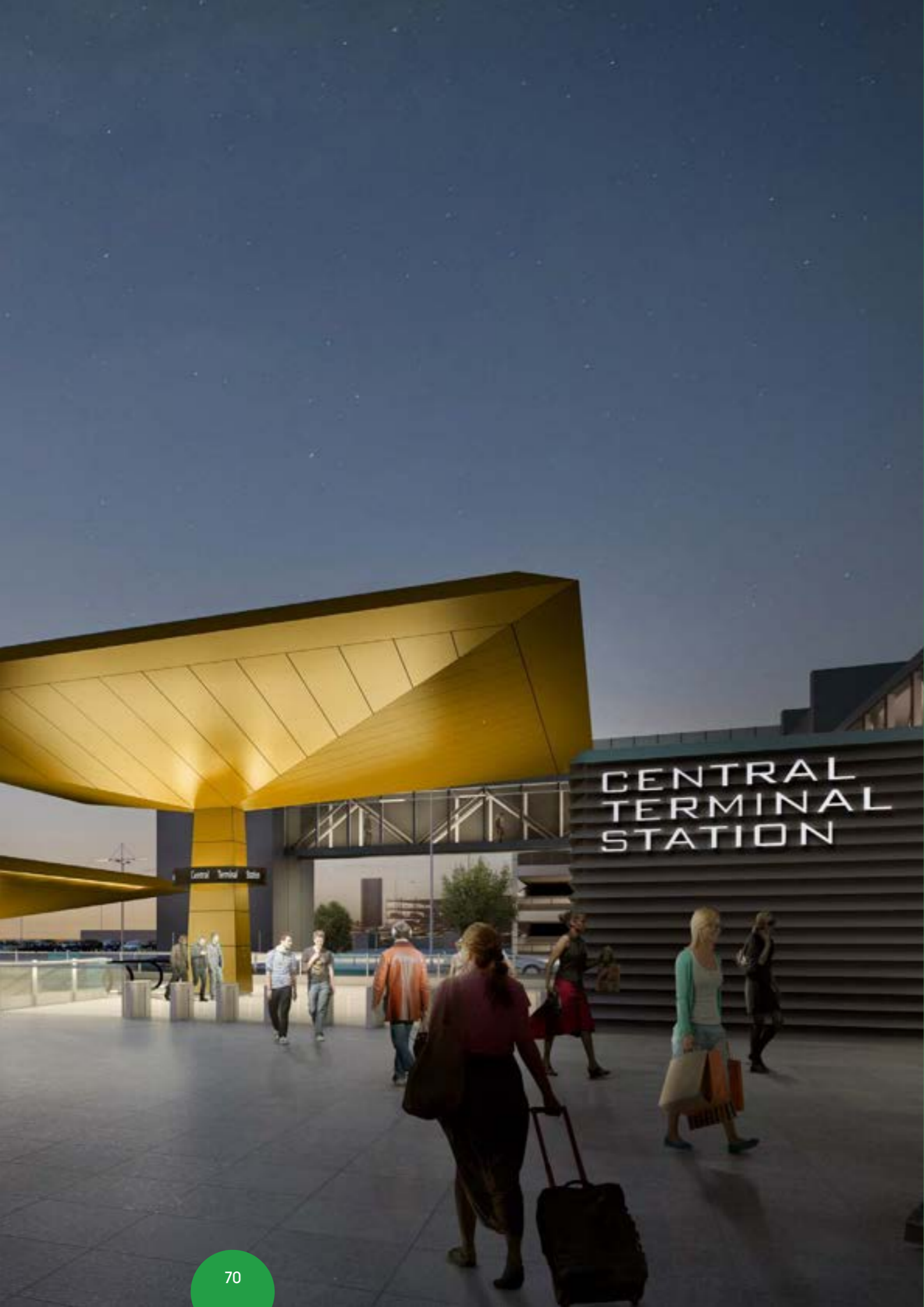
Consequently, the construction of a fuel storage facility and connection to the national fuel pipeline provides the opportunity to reduce or remove the current requirement for fuel delivery by road tankers over long distances. In addition, connection to the fuel pipeline will negate the need for up to 60 additional daily tanker movements to supply fuel for the proposed aircraft stands for Terminal 2.

It is anticipated that a blend of fuel types would need to be accommodated as changes in aircraft technology are developed. Moving from traditional fuel engines to sustainable aviation fuels (SAF), hydrogen and/or electric.

There is a UK SAF mandate requiring jet fuel suppliers to blend an increasing proportion of SAF into aviation fuel from 2025 which comprises a blend of conventional aviation fuel, which is a fossil fuel, with a bio-fuel. As SAFs increase in the market they would be distributed in the same manner as conventional fuels. Therefore, SAFs would arrive at the new fuel facility having already been blended, tested and approved. SAFs would have similar characteristics to existing fuel and therefore the proposed facility would be readily compatible.

Whilst electric aircraft are being developed now, commercially and operationally viable aircraft will not be available for some time. Whilst the impact and detail of these new technologies is uncertain, our reference design safeguards for the future use of electric planes by providing a new electricity substation at Terminal 2 and incorporating space on each stand within the proposed apron footprint for additional infrastructure required to charge the aircraft.

The use of hydrogen as fuel for aircraft is very immature. If this were to mature into a feasible proposition for aircraft using the airport it is proposed the apparatus required would replace some of the proposed fuelling infrastructure.



# 04 Improving access to the airport



## Our emerging transport strategy

We need to manage surface access to ensure it is high quality, efficient and reliable and does not give rise to unacceptable congestion or environmental impacts whilst supporting delivery of the wider vision for expanding the airport. We will do this through our Surface Access Strategy as part of the DCO.

Our document, **Getting to and from the airport - our emerging transport strategy**, sets out proposals for surface access at the airport over the next two decades. Through this consultation, we are seeking responses on this approach to inform the development of our final proposals.

It is proposed that this Surface Access Strategy would cover a 20-year period and would therefore be more strategic in nature, helping to shape and guide the long-term growth of the airport with a clear vision and objectives. The new Surface Access Strategy would be supported by the preparation of delivery plans, prepared every four years which would set out the specific priorities for surface access during that time period. Delivery plans would be informed by data and monitoring and overall performance against targets and objectives.

A key part of the development of the proposals for this emerging Surface Access Strategy is the identification of interventions to influence how passengers and employees travel to and from the airport. We are committed to improving accessibility to the airport, particularly by public transport and making the maximum use of the new Luton DART system that opens in 2022.

Our proposals for the Surface Access Strategy set out a toolbox of interventions that we can draw upon as and when required, in response to changing circumstances, informed by the results of ongoing monitoring. Increasing access to the airport by sustainable modes of transport will limit the increase in road traffic and impacts on the surrounding area, as well as reducing the environmental impacts of expansion.

## Forecourt, Luton DART and coach station

### Luton DART and rail access

The existing terminal building will be connected to Luton Airport Parkway station via a new rail link known as Luton DART which is expected to open in 2022. This connection will replace the existing bus services that connect the airport with Luton Airport Parkway station, providing a more seamless journey for rail users.

We are proposing to extend Luton DART from Terminal 1 to the proposed Terminal 2, to provide passengers with a quick and reliable choice of public transport between the airport and Luton Airport Parkway station.

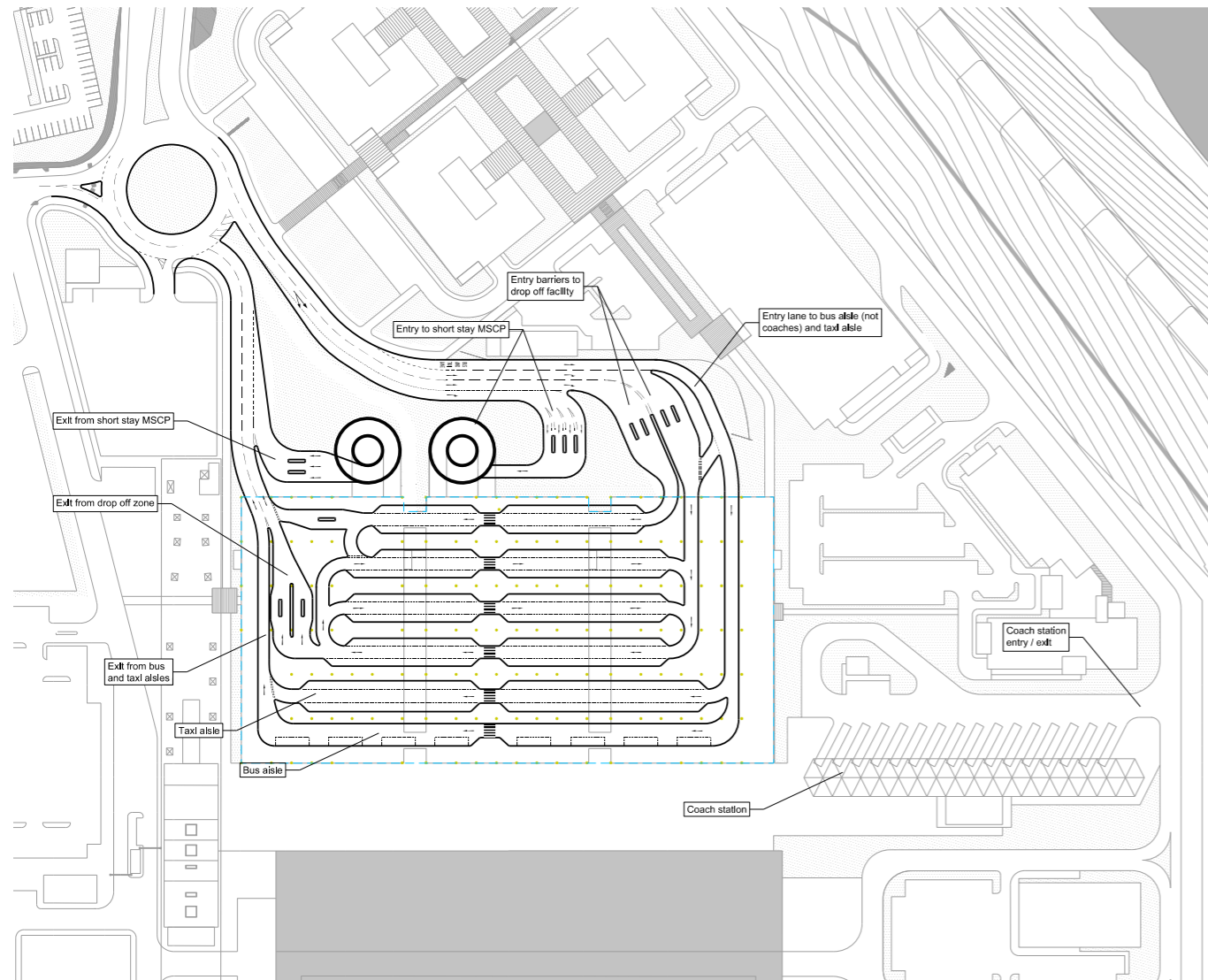


### Forecourt and coach station

A new forecourt area with passenger drop-off and bus stands would serve the new terminal. It has been designed to cater for the airport's busiest hours and cater for drop-offs, taxis, regular buses, and shuttlebuses. The design is based on the principle of private car drop-off activity taking place at ground level, with all private car pick-up movements taking place within a short-stay multi-storey car park located directly above. It is anticipated payment would be required for drop-off activity and this may include differential pricing relating to a vehicle's carbon emissions.

A coach station located to the immediate east of the forecourt would serve longer distance coach facilities.

Figure 4.1: Terminal 2 Forecourt (32 mppa)



**Car parks**

Our goal is for at least 45% of passenger journeys to and from the airport to be made by public transport and other sustainable travel methods, and we have calculated our required car parking numbers on this basis.

Restricting car parking and applying charges for using the airport roads is one effective way of encouraging passengers and staff to use public transport.

To meet the anticipated parking requirements, the majority of the existing parking provision will be retained including the existing multi-storey car park facilities at Terminal 1, together with a new surface level car park (to be upgraded to a multi-storey car park at 32 mppa) adjacent to Terminal 2.

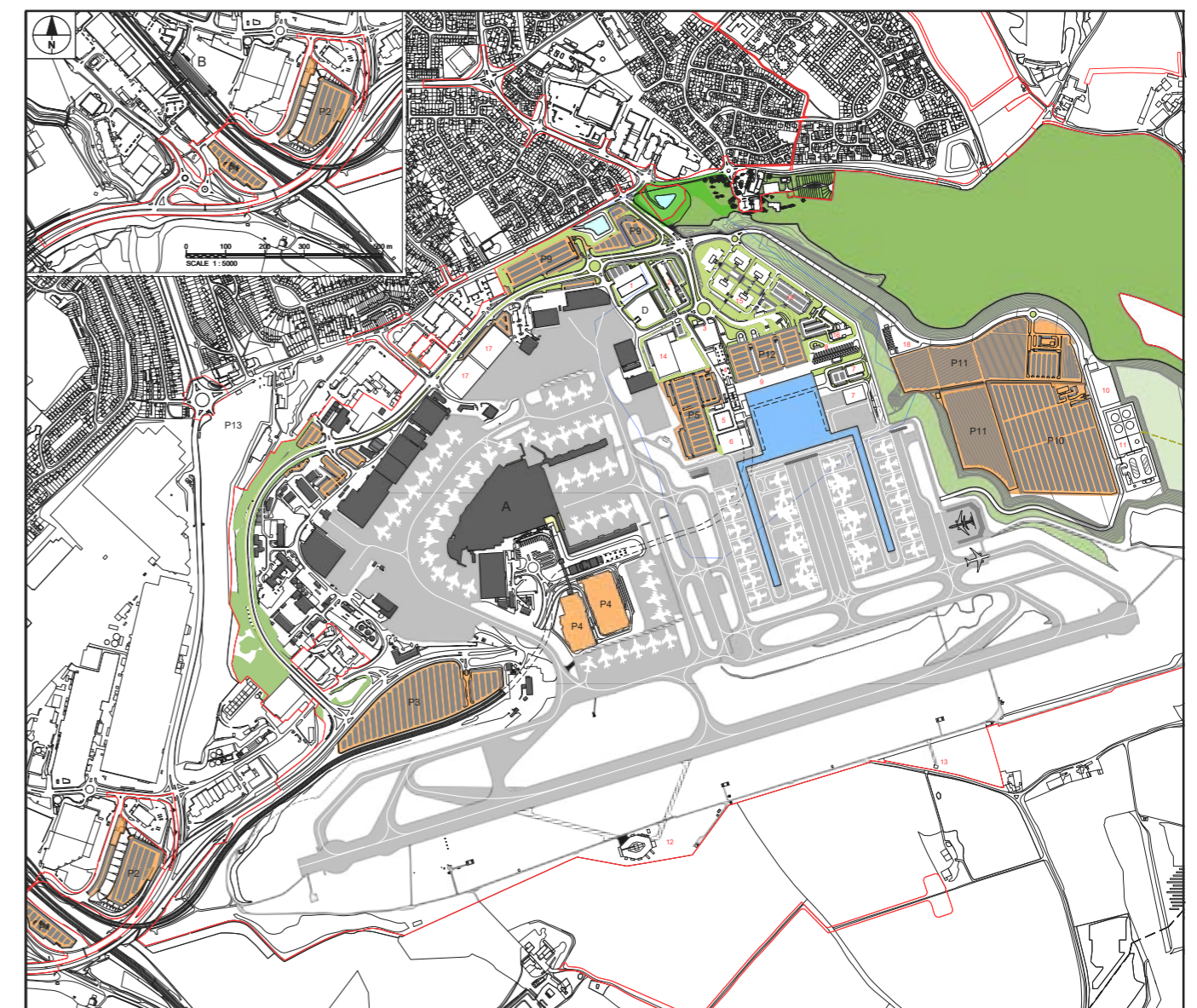
The existing long-stay car park, together with its proposed additional capacity serving both the existing terminal and Terminal 2, would be located to the east of the Terminal 2 site.

The existing mid-stay and the replacement long-stay car parks will still require shuttle buses.

Figure 4.2 below shows the proposed location of the short-stay, mid-stay and long-stay car parks for the expanded 32 mppa airport. Further information about the phasing of these facilities is contained in section 5 of this brochure.

Staff parking is proposed to be accommodated within a decked car park on the site of the existing staff car park and car hire centre, located to the north of Percival Way. Additional provision for dedicated airport employee parking is to be made within the proposed car parks near Luton Airport Parkway station. It is anticipated that drivers parking in these car parks would be able to use the Luton DART to reach both terminals.

Figure 4.2 Proposed Car Parking Locations: 32 mppa



**KEY**

Proposed car park locations

Table 4.1 Proposed car parking provision

| Parking Type           | Parking Space Requirements |               |               |
|------------------------|----------------------------|---------------|---------------|
|                        | 21.5 mppa                  | 27 mppa       | 32 mppa       |
| Short Stay             | 4,150                      | 4,800         | 5,800         |
| Mid Stay               | 2,600                      | 3,000         | 3,650         |
| Long Stay              | 4,675                      | 5,400         | 6,550         |
| Employee               | 4,400                      | 4,900         | 5,200         |
| Car Hire               | 500                        | 600           | 700           |
| Valet Pick Up/Drop Off | 75                         | 100           | 125           |
| <b>Total</b>           | <b>16,400</b>              | <b>18,800</b> | <b>22,025</b> |

Source: Getting to and from the airport – our emerging transport strategy

### Surface access

As we expand the airport using a phased approach as passenger demand grows, we would progressively deliver improvements to local roads and public transport infrastructure to support this. Our surface access objectives include at least 45% of passengers accessing the airport using public transport and other sustainable modes of transport, increasing from the current percentage share of just under 38% at 2019 pre Covid levels.

For employees we aim for 54% of commuting to the airport using public transport, cycling, and walking. Our modelling currently applies this 54% figure to new employees only for the purposes of robustness, however existing employees will also be encouraged to utilise more sustainable modes of travel.

We would also deliver highway improvements to mitigate the impact of additional trips on the road network. Government planning policy is clear that all developers should address the potential effects of their proposals on transport networks, and seek to avoid and mitigate adverse traffic and environmental impacts. Aviation 2050 – the Future of UK Aviation (2018) states that *“all proposed airport developments need to be accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport and minimise congestion, emissions and other local impacts.”*



To improve surface access to the airport by passengers and staff, we would:

- Extend the Luton DART connectivity with Luton Airport Parkway station and Terminal 1, to a new DART station at Terminal 2.
- Build a new coach station at Terminal 2 and improve existing Terminal 1 bus /coach facilities.
- Build a new Terminal 2 forecourt area with passenger drop-off and pick-up areas, bus station, and taxi provision.
- Build new short-stay and long-stay car parking, and car parking for staff, taxis, and hire cars for the new terminal.
- Provide a new Airport Access Road as part of our proposals.
- Provide road access connectivity between the Airport Access Road and the terminal and associated airport facilities.
- Fund off-site highway and junction improvements.
- Investigate opportunities for parking controls and traffic management/ traffic calming measures, particularly in rural areas to the east of the airport and within the Wigmore residential area.

Table 4.2, below, provides details on the proposed changes to modal share for passenger travel, where increases in public transport are sought.

Table 4.2 Proposed changes to modal share for passenger travel

| Passenger Mode of Travel to Airport (expressed as percentages) | 18.0 mppa      | 21.5 mppa      | 27.0 mppa      | 32.0 mppa      |
|--|----------------|----------------|----------------|----------------|
| Bus/Coach  | 16.86%         | 17.00%         | 18.20%         | 18.20%         |
| Rail/MPT (includes MPT from 2020)                              | 20.72%         | 23.00%         | 26.80%         | 26.80%         |
| Taxi/Minicab   | 17.94%         | 17.00%         | 15.50%         | 15.50%         |
| Walk/Cycle   | 0.17%          | 0.20%          | 0.20%          | 0.20%          |
| Private Car (Drop Off/Pick Up)                                 | 26.75%         | 26.00%         | 23.50%         | 23.50%         |
| Private Car (On Site Car Park)                                 | 9.82%          | 9.50%          | 8.70%          | 8.70%          |
| Private Car (Off Site Car Park)                                | 5.80%          | 5.20%          | 5.00%          | 5.00%          |
| Rental Car   | 1.88%          | 2.00%          | 2.00%          | 2.00%          |
| Other  | 0.06%          | 0.10%          | 0.10%          | 0.10%          |
| <b>Total:</b>  | <b>100.00%</b> | <b>100.00%</b> | <b>100.00%</b> | <b>100.00%</b> |
| Public Transport Mode Share:                                   | <b>37.58%</b>  | <b>40.00%</b>  | <b>45.00%</b>  | <b>45.00%</b>  |
| Private Car (inc. rental cars), Taxi/Minicab:                  | <b>62.19%</b>  | <b>59.70%</b>  | <b>54.70%</b>  | <b>54.70%</b>  |
| Walk/Cycle, Other:   | <b>0.23%</b>   | <b>0.30%</b>   | <b>0.30%</b>   | <b>0.30%</b>   |

## Rail access

Luton Airport Parkway station currently has regular services to and from London St Pancras International, and other destinations in the South-East. Abellio have operated the East Midlands franchise, which runs until 2027, since August 2019. Among a variety of planned service improvements, the operator introduced a dedicated EMR Connect Corby-St Pancras express service which started in December 2020. The Corby-London service was also doubled to provide two trains per hour. This means that Kettering, Luton and Luton Airport Parkway services are provided with two trains per hour for most of the day. Enhanced Sunday services are also planned throughout the route with regular direct Sunday services between London and Corby.

The provision of Luton DART also means that rail journeys can be made from St. Pancras station to the airport in 30 minutes, using the fastest services.

The government has invested in the rail network serving Luton Airport Parkway station through its £7 billion Railplan 2020 programme. This seeks to increase passenger capacity, boost service reliability, and improve journeys by modernising the existing railway. By the end of 2019, 24 trains per hour flowed in and out of London St Pancras station during peak periods – one train every two and a half minutes.

Six or seven East Midlands trains and Thameslink trains per hour stop at Luton Airport Parkway station. When compared with 2014, the increase in seating capacity for Thameslink trains between St Pancras and stations to the north, including Luton Airport Parkway station, is estimated to be 15%. New 'Class 700' trains running on the Thameslink franchise are an upgrade on older trains used on this line in terms of both comfort and passenger capacity. These new trains are designed for comfortable and safe standing; to inform passengers which carriages have space, and which have space for luggage; to optimise passenger flow in, out, and through the train, with wider aisles and no doors between carriages; and are fully accessible for those with bikes, buggies and wheelchairs. Considering standing areas in the new trains, passenger capacity has more than doubled – an increase of 136%.

The trains also have a state-of-the-art information system that provides live travel information covering the status of both mainline and London Underground services to help passengers plan their onward travel arrangements. They display general passenger information, such as the name of the next station and are air-conditioned to keep a comfortable temperature throughout the train. These improvements are not part of our scheme but set the context for how people will access the airport by public transport in the future.

### Framework Travel Plan

This section presents a summary of the key elements of the Framework Travel Plan (FTP) to seek opinions and enable further refinement as the plan is brought forward. The FTP will be completed and made available as part of our application for development consent. Further details are set out in our document **Getting to and from the airport - our emerging transport strategy** available on our website.

The table below shows potential FTP targets and measures. Engagement with highway authorities is ongoing to identify and eventually implement further measures. We would work together with LLAOL on the plan and assume joint responsibility for its development and implementation. A Travel Plan Co-ordinator would be appointed to undertake the day-to-day management of the plan.

Table 4.3 Proposed Framework Travel Plan measures

| Intervention/measure   | Increase air passenger public transport mode share | Increase employee sustainable mode share | Strive to be the best possible neighbour | Support LBC climate ambitions | Contribute towards economy | Delivered by Luton Rising | Delivered by or in partnership with third parties |
|--|--|--|--|-------------------------------|----------------------------|---------------------------|---|
| <b>Priority area: Luton DART and rail</b>  |  |  |  |                               |                            |                           |   |
| Theme: Maximise opportunities to connect with existing and planned rail infrastructure   |  |  |  |                               |                            |                           |   |
| FTP measure: Extend Luton DART, to connect T1 to T2 *  | ✓  | ✓  |  |                               |                            | ✓                         |   |
| FTP measure: Promote travel opportunities associated with East West Rail and other third-party schemes                               | ✓  | ✓  |  | ✓                             |                            | ✓                         |   |
| FTP measure: Explore better public transport interchange and connections from airport to rail stations not on Midland Mainline route | ✓  | ✓  |  | ✓                             |                            |                           | ✓   |

|   |   |   |   |   |   |   |   |
|---|---|---|---|---|---|---|---|
| FTP measure: Integrated ticketing between rail and DART to provide seamless connection to airport   | ✓ | ✓ |   | ✓ |   |   | ✓ |
| FTP measure: Engage with operators for improved service provision along Midland Mainline route particularly during off peak periods                                   | ✓ | ✓ |   | ✓ |   | ✓ | ✓ |
| <b>Priority area: Bus and coach</b>   |   |   |   |   |   |   |   |
| Theme: Improve buses for passengers and staff and enhance connectivity  |   |   |   |   |   |   |   |
| FTP measure: Engaging with bus operators to create new and extended routes, better connecting the airport to more places in particular urban areas and transport hubs | ✓ | ✓ | ✓ |   |   |   | ✓ |
| FTP measure: Explore employee-only buses to poorly connected residential areas  |   | ✓ | ✓ |   | ✓ |   | ✓ |
| FTP measure: Explore bus enhancements, including subsidies for east west routes to improve service provision and passenger experience                                 | ✓ | ✓ | ✓ | ✓ |   |   | ✓ |
| FTP measure: Review updating buses transferring passengers from car parks to Terminals to net zero fleet  | ✓ |   |   | ✓ |   |   | ✓ |
| FTP measure: Delivery of Airport Access Road will improve connectivity and journey time reliability for buses accessing the airport                                   | ✓ | ✓ | ✓ | ✓ |   | ✓ |   |

| Theme: Strengthen coach offer with new routes and better interchange               |  |   |   |   |   |  |   |   |
|--|--|---|---|---|---|--|---|---|
| FTP measure:   | Strengthen coach offer with new hub at Terminal 2 *  | ✓ |   |   | ✓ |  | ✓ |   |
| FTP measure:   | Coach Hub connected to T1 by DART extension *  | ✓ |   |   | ✓ |  | ✓ |   |
| FTP measure:   | Work with operators to open up new connections and destinations  | ✓ |   |   | ✓ |  |   | ✓ |
| FTP measure:   | Work with operators to strengthen existing services  | ✓ |   |   | ✓ |  |   | ✓ |
| Priority area: Walking and cycling   |  |   |   |   |   |  |   |   |
| Theme: Make walking and cycling an attractive and viable choice for more employees |  |   |   |   |   |  |   |   |
| FTP measure:   | Provide high quality cycle parking and facilities at T2  |   | ✓ |   |   |  |   | ✓ |
| FTP measure:   | Improve pedestrian and cycle wayfinding across the airport site  |   | ✓ |   |   |  |   | ✓ |
| FTP measure:   | Contributions towards Luton-wide cycling initiatives   |   | ✓ | ✓ |   |  |   | ✓ |
| FTP measure:   | Contributions towards North Herts Walking and Cycling Infrastructure plan for schemes that improve access to the airport |   | ✓ | ✓ |   |  |   | ✓ |
| FTP measure:   | Investigate feasibility of improved cycle access along Airport Access Road and its environs                              |   | ✓ |   |   |  |   | ✓ |

| Priority area: Vehicle access and parking  |   |   |   |  |   |   |   |   |
|--|---|---|---|--|---|---|---|---|
| Theme: Effectively manage and control onsite vehicle access and parking to incentivise sustainable mode and vehicle choices. |   |   |   |  |   |   |   |   |
| FTP measure:   | Set, vary and enforce charges on private vehicles using airport roads, car parks and forecourts to encourage access to the airport by sustainable modes and the cleanest private vehicles * | ✓ |   |  | ✓ |   |   | ✓ |
| FTP measure:   | Changes in passenger car parking proportional to mode share *   | ✓ |   |  | ✓ |   |   | ✓ |
| FTP measure:   | Changes in employee car parking proportional to mode share *  |   | ✓ |  | ✓ |   |   | ✓ |
| FTP measure:   | Undertake rapid roll out of EV charging points for cars using the airport car parks   |   |   |  | ✓ |   |   | ✓ |
| FTP measure:   | Work with taxi and private hire operators to achieve the fastest possible transition to zero emission vehicles serving the airport  |   |   |  | ✓ |   |   | ✓ |
| FTP measure:   | Incentivise cleaner vehicles through Cleaner Energy Charging Strategy *   |   |   |  | ✓ |   |   | ✓ |
| FTP measure:   | Hackney cab rank at T2 forecourt *  |   |   |  |   | ✓ | ✓ |   |

|   |   |  |   |   |   |   |   |   |
|---|---|--|---|---|---|---|---|---|
| FTP measure:  | Improve forecourt operations with ability to handle demand to limit queuing and antisocial drop-off *   |  |   | ✓ |   |   | ✓ |   |
| FTP measure:  | Improve signage for vehicles between car parks, to limit circulation  |  |   |   | ✓ |   | ✓ |   |
| Theme: Protect surrounding communities from potential negative impacts                        |   |  |   |   |   |   |   |   |
| FTP measure:  | Support the expansion of the residents parking zone to the north of the airport *   |  |   | ✓ |   |   |   | ✓ |
| <b>Priority area: Highway improvements</b>  |   |  |   |   |   |   |   |   |
| Theme: Support the reliable operation of the highway network surrounding the airport          |   |  |   |   |   |   |   |   |
| FTP measure:  | Highway improvements to make the network perform better for longer, also aiding bus journey time reliability and pedestrian connectivity                      |  |   | ✓ |   | ✓ |   | ✓ |
| FTP measure:  | Monitor routes to airport to pick up unintended impacts on local communities  |  |   | ✓ |   |   | ✓ |   |
| <b>Priority area: Technology and data</b>   |   |  |   |   |   |   |   |   |
| Theme: Capture benefits of data, technology and innovation in journey planning and experience |   |  |   |   |   |   |   |   |
| FTP measure:  | Improved understanding of passenger and employee travel behaviour through more comprehensive surveys to robustly monitor and review surface access progress * |  | ✓ |   |   |   | ✓ |   |

|   |  |  |   |   |  |  |  |   |
|---|--|--|---|---|--|--|--|---|
| FTP measure:  | Expand Travel Planning team offer to develop a package of employee travel incentives * |  | ✓ | ✓ |  |  |  | ✓ |
| Measures marked with an asterisk (*) would be directly delivered under scheme infrastructure proposals being consulted upon |  |  |   |   |  |  |  |   |

Proposed road and junction improvements

Figure 4.3 Airport Access Road: Terminal 2 Initial Opening

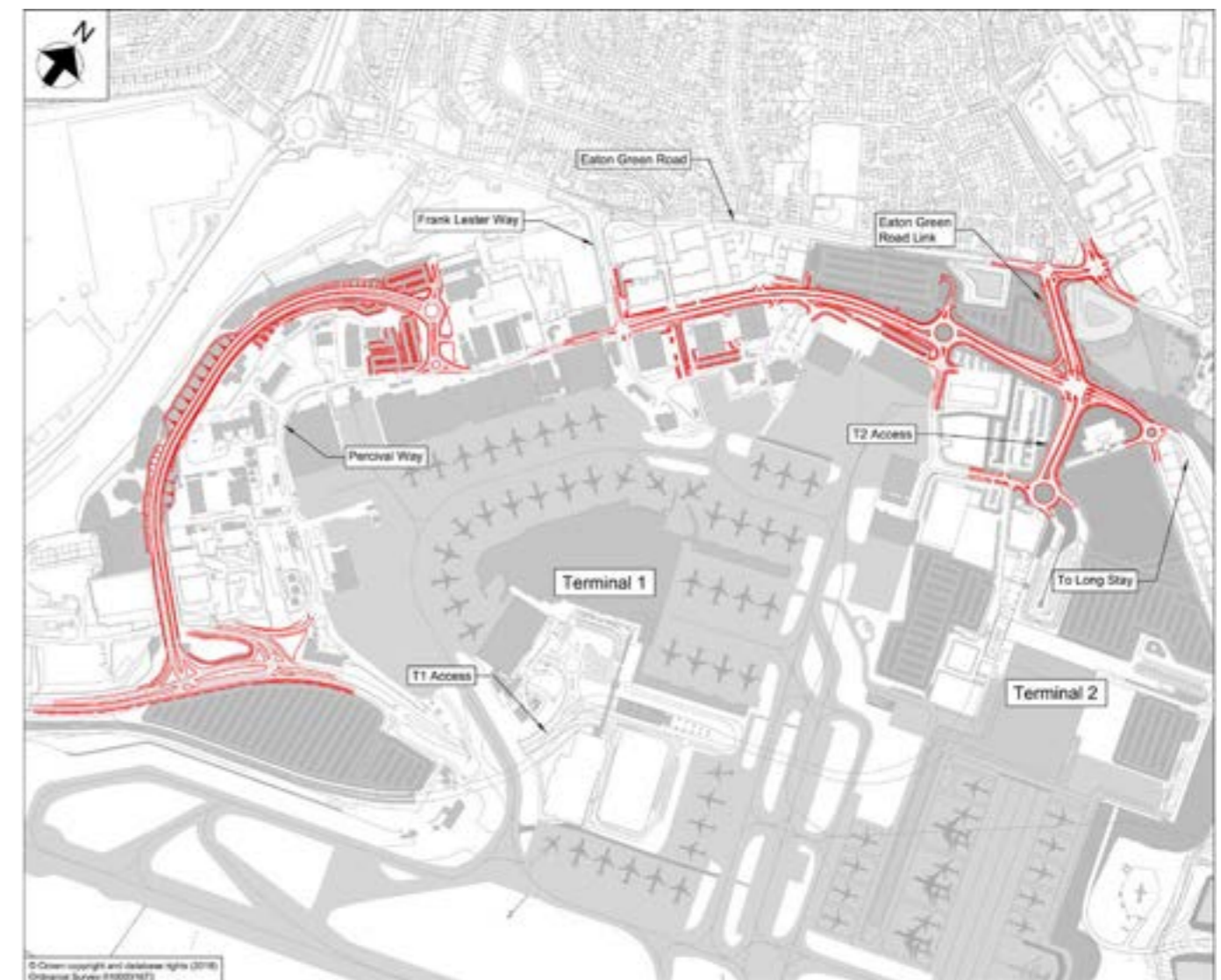
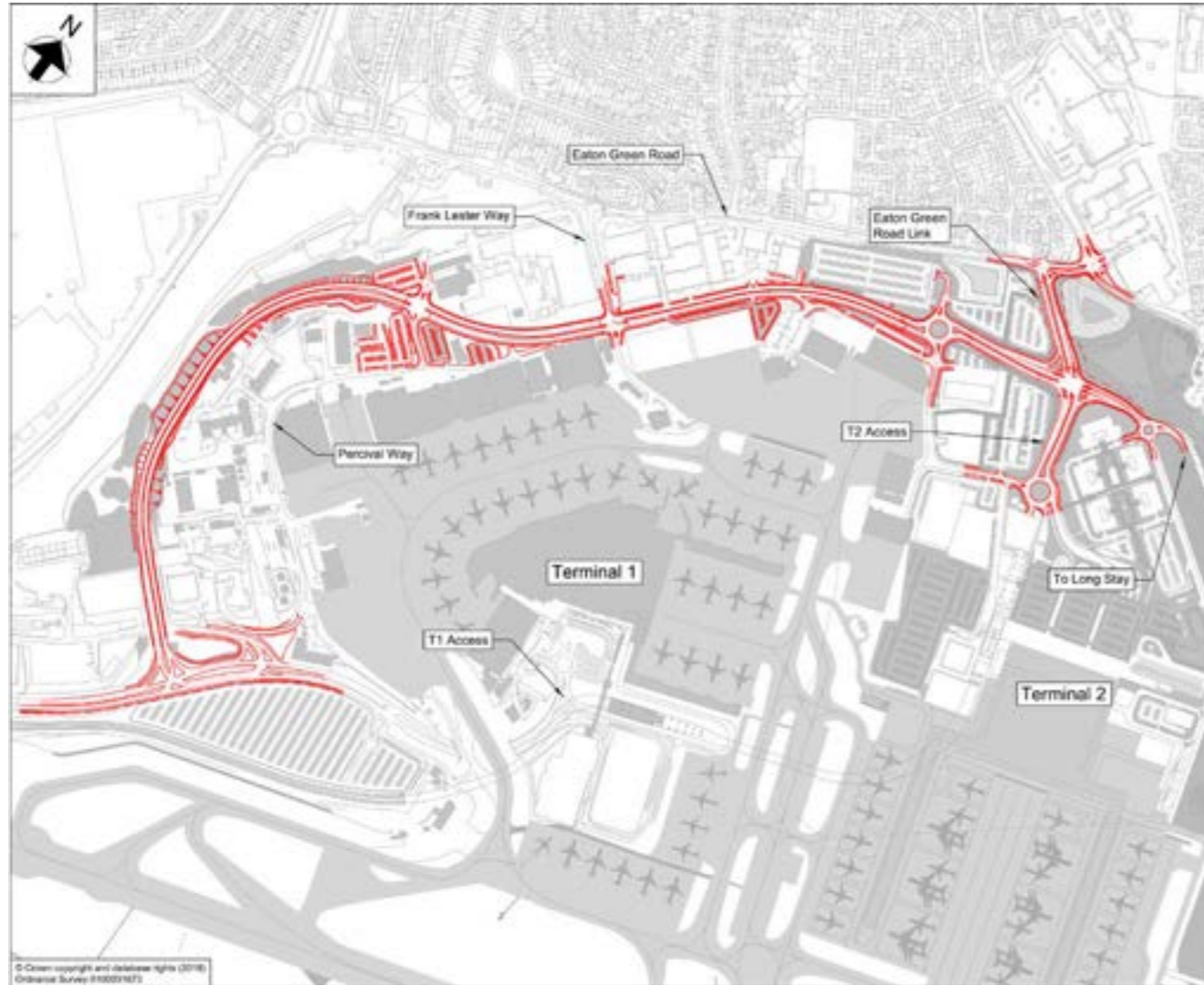


Figure 4.4 Airport Access Road: Complete Terminal 2 Development



The Airport Access Road (AAR), formerly known as Century Park Access Road during our previous consultation, is now included as part of our application for development consent. Uncertainty as to if and when this road could be delivered as a consequence of the changed economic situation caused by the Covid-19 pandemic, led to the decision to include a slightly modified version of the road within our proposals. This provides the certainty required that we would have the ability to deliver the road ahead of the time it would be relied upon for access to the expansion area east of the existing airport.

As shown above the AAR would be introduced in readiness for the opening of Terminal 2 and then would be upgraded further between Provost Way and Frank Lester Way junctions to cater for the full development of Terminal 2.

To provide greater capacity at road junctions which would see an increase in traffic when more people travel to and from the airport, we are proposing improvements to roads in the wider area, the locations of which are shown in Figure 4.6. None of the highway works proposed to be consented by our application for development consent are considered to be of a scale that would qualify them as Nationally Significant Infrastructure Projects in their own right. The majority of additional traffic travelling to and from the expanded airport is forecast to be focused on the A1081 between the airport and M1 Junction 10, and then on the M1 itself to the north and south of Luton. There would also be traffic flow changes in south east Luton with increases on local routes to the south and east of the airport.

Even without any expansion at the airport, traffic within the areas surrounding the airport is forecast to increase in the future. This would likely result in greater congestion, delays, and a reduction in average speeds.

For example, without the proposed expansion, traffic levels in 2043 would be forecast to increase from the 2016 base of between 24% and 35%, depending on the time of day, on average across the five districts of Luton surrounding the airport.

With the proposed expansion, traffic levels would be forecast to increase from the 2043 without expansion by 0.6% and 0.8% on average across the same area. However, forecast traffic increases would likely be above average in Luton (up to 3.4%) and North Hertfordshire (up to 2.2%) when compared to without expansion.

The increased traffic flow due to the expansion of the airport would be concentrated on the A1081 and south east Luton. A small amount of the additional traffic would also use local routes to the south and east of the airport. This forecast increase in traffic with the expansion at the airport would reduce average speeds on roads across the wider area by around 1%, with the largest forecast reduction in speeds of up to 5.7% within Luton. North Hertfordshire and St Albans are forecast to experience average speed reductions of up to 0.5%.

Figure 4.5, overleaf, shows the airport related traffic distribution as interpreted from the 2016 Civil Aviation Authority (CAA) survey data.



Figure 4.5 Airport Traffic Distribution (2016 CAA Data)

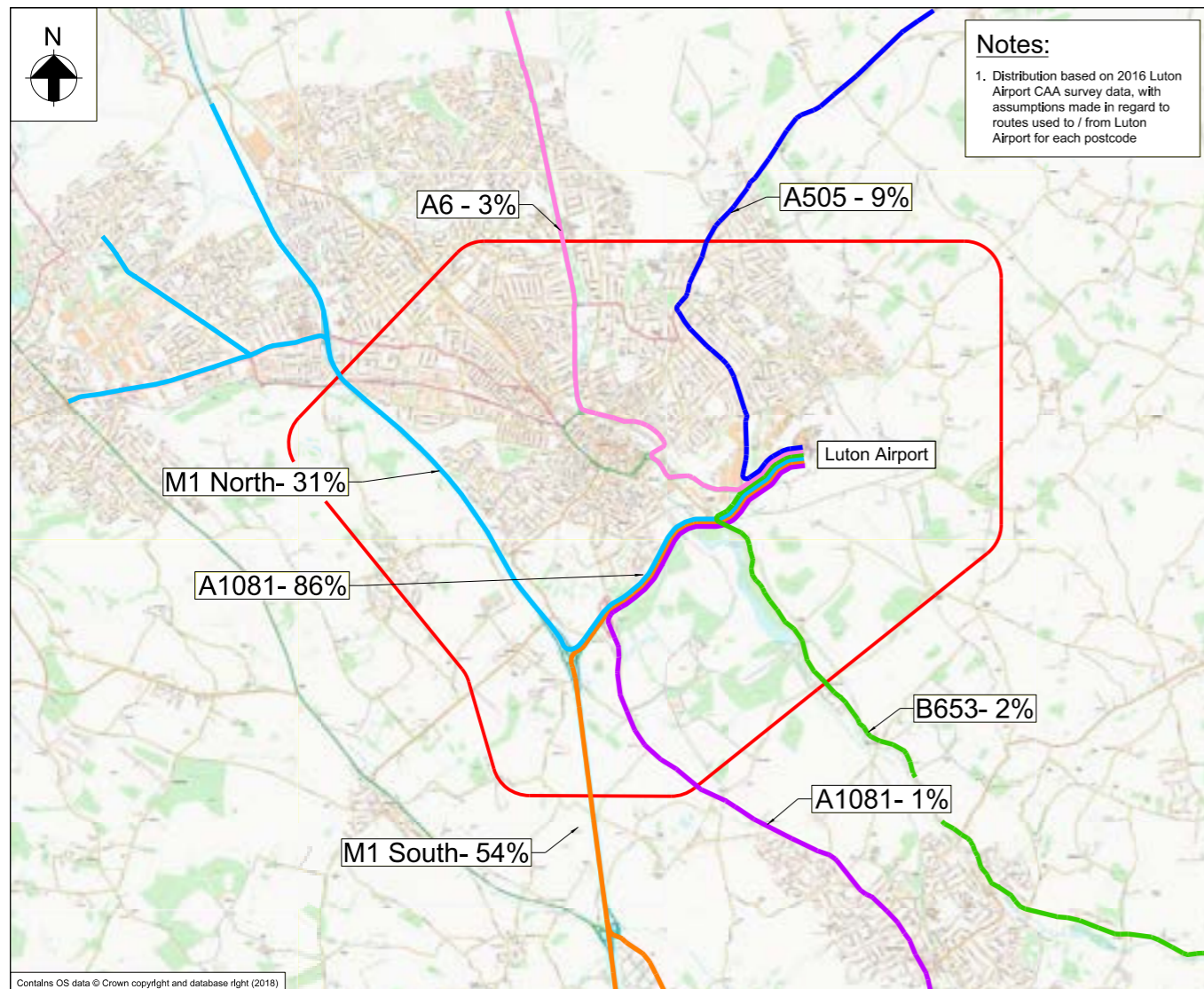
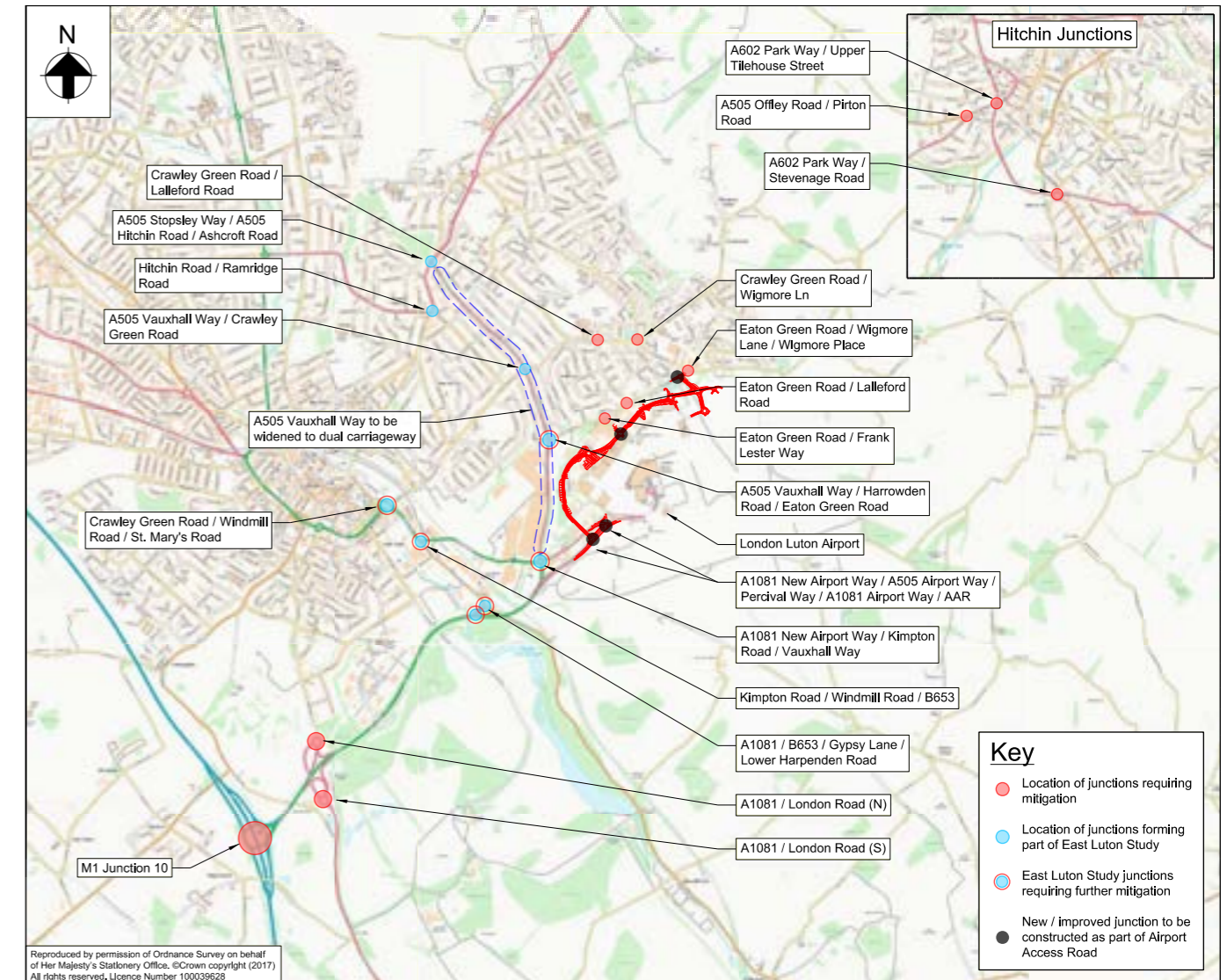


Figure 4.6 shows the locations of the off-site highway mitigation which is proposed. The improvements at these junctions would be provided at different stages of the scheme, and generally comprise road widening and realignment, signalisation of junctions and improvements to junction efficiency amongst other measures. A detailed list of these improvements can be found in **Getting to and from the airport - our emerging transport strategy**.

Figure 4.6 Locations of Proposed Junction Mitigation



### Parking and traffic management

We would continue to work with stakeholders and local authorities to investigate the requirement for residential parking control areas, or traffic management locations needed to safeguard against on-street parking and rat-running near the airport. This will be part of our cooperation with local authorities in relation to monitoring and providing appropriate levels of intervention as the airport grows over time, and is a fundamental component of our general travel plan approach.

### Staff travel

For transport modelling purposes, we forecast that the current number of airport employees would grow by approximately 350 jobs per additional 1 mppa. 16% of staff currently use public transport to get to work: 7% by rail, and 9% by bus or coach. In order to improve take-up of public transport by employees, the airport operator is already pursuing a strategy of reducing single occupant vehicle trips

through a car-share scheme, discounted travel cards (Plusbus), and live travel time information at bus terminals/stops.

We believe that, with a continuation of these interventions, the public transport demand share for employees at the airport could potentially increase to 26% in Phase 1 and 40% by Phase 2. The percentage of employee trips made by walking and cycling, which currently stands at 7%, also has the potential to reach 14% by Phase 2 through the introduction of measures and initiatives to encourage staff uptake of sustainable travel modes. These initiatives would be co-ordinated under the Framework Travel Plan, as described previously in Table 4.2 of this brochure. Our proposals include cycle stands for staff to use, along with changing rooms and showers. We would engage in continuous discussions with stakeholders on how best to provide new sustainable transport infrastructure. In particular, we will build on existing levels of co-operation to date.



## 05 Building our airport

## Overview

This section describes how we propose to build the scheme and the associated facilities and works.

The strategy for our expansion proposals is to retain the existing passenger terminal and provide a new passenger terminal on land owned by us and our shareholder (Luton Borough Council) to the north east of the runway, to create an overall passenger capacity of 32 mppa.

The airport's current operational capacity was reached in 2019 (although passenger numbers have since reduced due to Covid-19). We expect the airport to reach its current operational capacity in 2023/4. Implementing our proposal to develop a second passenger terminal will take a number of years, during which time demand to use the airport is expected to continue to grow.

It is our intention that this additional capacity will be delivered across a programme of works that will enable the appropriate facilities to be delivered only when demand requires them. Certain infrastructure improvements, such as taxiway connections, will need to be provided in full at an early stage to minimise disruption to airport operations and nearby communities.

In parallel to the phased delivery of the airport expansion, there may also be other projects under construction in the immediate vicinity, such as within the London Luton Airport Enterprise Zone. You can read more about the planned development in this area on page 21.

There are two phases to the expansion proposals:

- **Phase 1** – Expansion of Terminal 1 capacity up to 21.5 mppa, comprising works that develop capacity in advance of Terminal 2 opening, in line with the demand
- **Phase 2** – Terminal 2 enabling 32 mppa capacity for the airport, which includes the bringing into use of Terminal 2 and its associated infrastructure and support facilities, initially for 7 mppa and increasing to 12 mppa in line with demand

These phases are explained in more detail in the rest of this section of the brochure.

## Phase 1 — Enabling 21.5 mppa capacity

LLAOL has been delivering a project to expand the airport to accommodate 18 mppa, which is called Project Curium. The majority of this project has been delivered with the following elements still to be completed.

- The provision of necessary aircraft stands
- A new taxiway link to the east end of the runway

These elements are therefore not included with our application for development consent.

LLAOL has submitted an application for 19 mppa. This application is predicated on growth in the average number of passengers on each aircraft movement which will not require any additional airport infrastructure.

In addition to the current proposals being brought forward by LLAOL the following capacity improvements will be included within the application for development consent to enable further growth in demand to continue to be handled ahead of the development of Terminal 2:

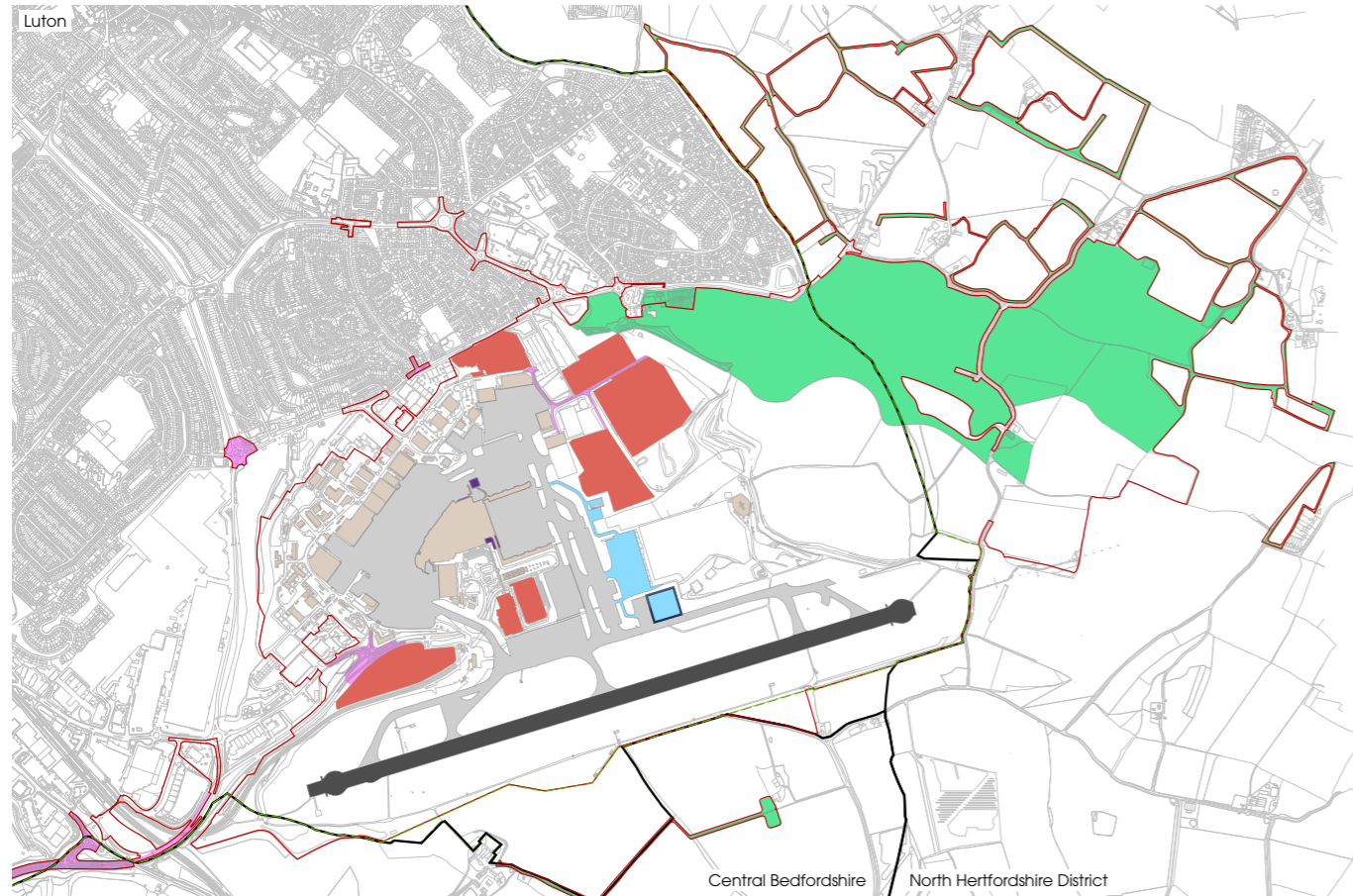
- Seven stands within our Terminal 2 development zone
- Localised extensions and remodelling of part of Terminal 1 to provide capacity for up to 21.5 mppa, including additional baggage reclaim facilities, security, seating, and temporary bussing gates

The works will be included within our application for development consent and would start before the delivery of Terminal 2.

These expansion plans are reflected in our **Works Description Report**.



Figure 5.1 Phase 1 proposals



North  
Scheme layouts and Work Numbers are indicative only

**KEY**

|                                 |  |  |
|---------------------------------|--|--|
| — Proposed Development Boundary | Existing apron/taxiways/links                      | Proposed parking   |
| — Local Authority Boundary      | Existing airport terminal and associated buildings | Existing Engine Run-Up Bay updates                       |
| — Green Belt Boundary           | Proposed apron/taxiways/links                      | Proposed onsite highways works                           |
| — Existing runway               | Proposed terminal and associated works             | Proposed replacement open space and landscape mitigation |

### Phase 2 — Enabling 32 mppa capacity

Based on the passenger demand forecast, it will be necessary to deliver additional capacity which requires an additional terminal to be constructed.

The new terminal (Terminal 2) will be sufficiently sized to accommodate an initial additional capacity of 7 mppa.

This will facilitate a move of operations from the existing terminal and accommodate one or more airlines without splitting operations across both terminals.

Development of Terminal 2 will continue, enabling growth to a maximum of 12 mppa through the new terminal and a total of 32 mppa across the airport.

The phasing will be kept under review as the development progresses to ensure that capacity is created when required to respond to demand.

The new aircraft stands built in Phase 1 would be adjacent to the new terminal and serviced by it on opening, from which point each of the terminals would operate largely independently, each with their own airlines, aircraft stands, and support facilities.

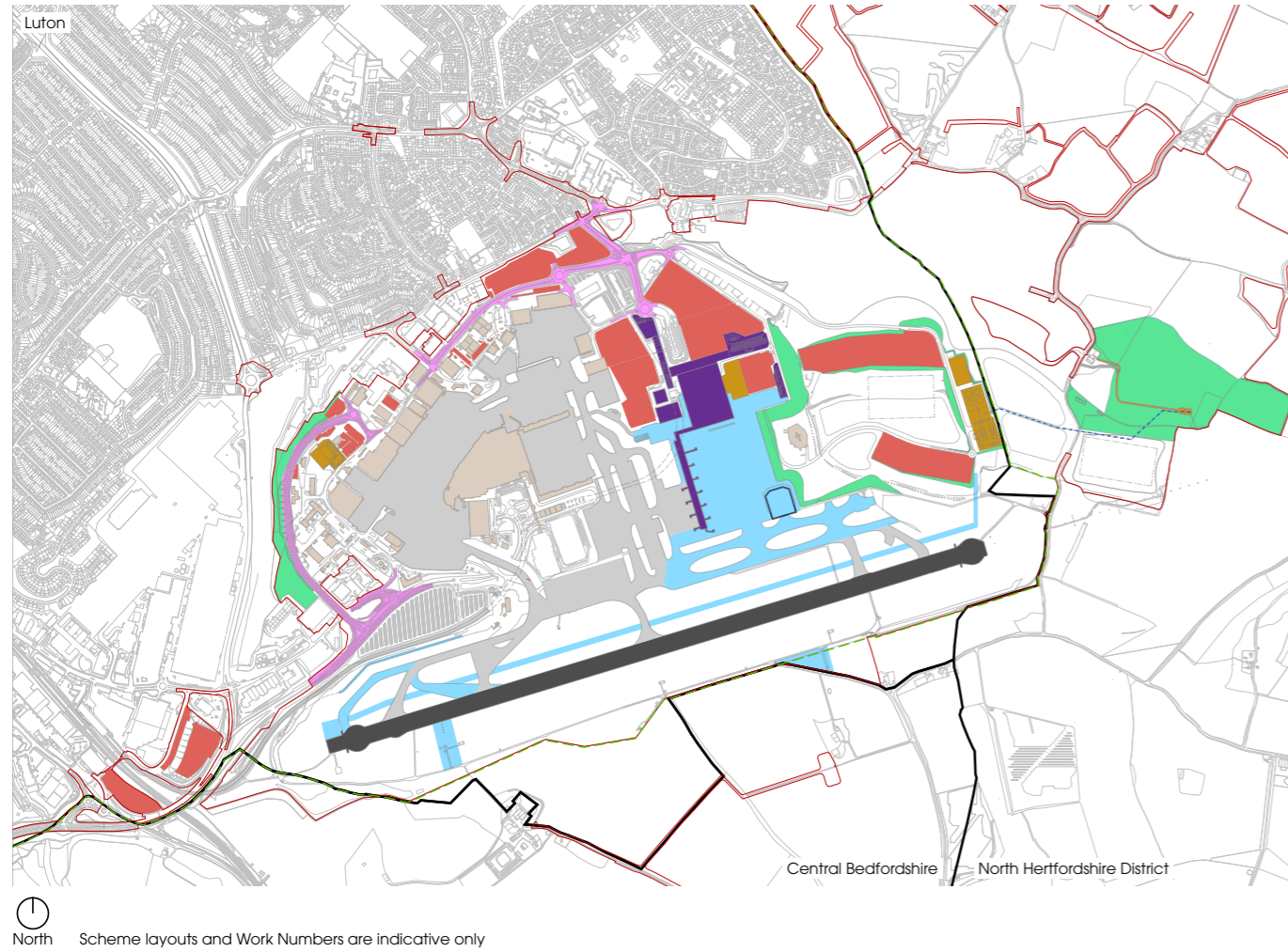
The new terminal will be served by an extension to the Luton DART. While the increased emphasis on public transport will reduce the need for vehicle access, a new dual carriageway Airport Access Road accessed via a new junction on the existing New Airport Way (A1081) to Terminal 2 will be implemented together with several local road improvements.

The development will include the following:

- Provision of a drop-off area
- Provision of a multi-storey car park
- Provision of a plaza between the drop-off and Terminal 2
- Additional car parks
- Provision of a Terminal 2 hotel
- Expansion of airfield and ground handling operations centres
- Provision of additional hangars to support the aircraft based at the expanded airport

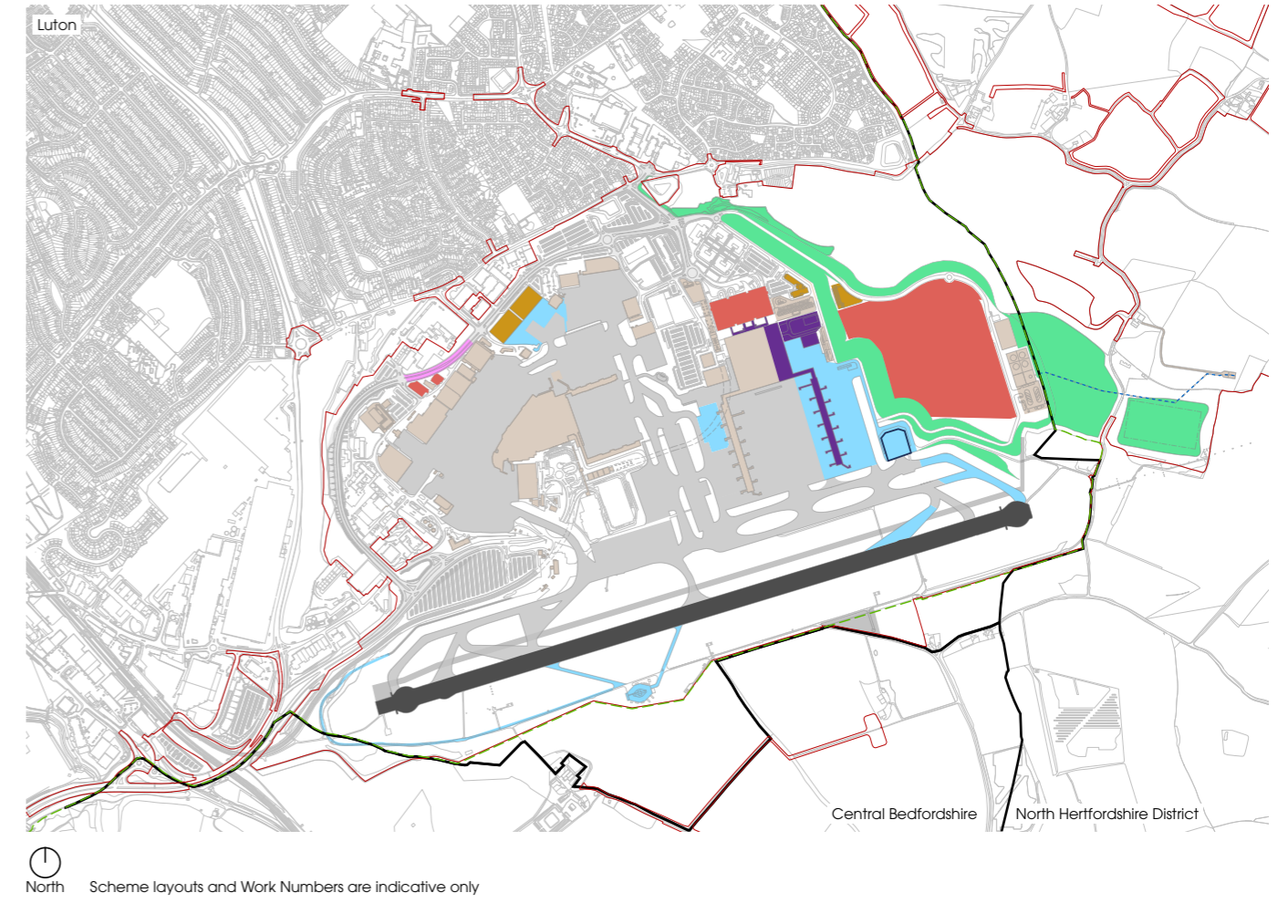


Figure 5.2 Phase 2a proposals



- KEY**
- Proposed Development Boundary
  - Local Authority Boundary
  - - Green Belt Boundary
  - █ Existing runway
  - █ Existing apron/taxiways/links
  - █ Existing airport terminal, associated buildings and support facilities
  - █ Proposed apron/taxiways/links and airport equipment
  - █ Proposed terminal and associated works
  - █ Proposed parking
  - █ Proposed Engine Run-up Bay
  - █ Proposed airport support facilities
  - - Proposed fuel line
  - █ Proposed onsite highways works
  - █ Proposed replacement open space and landscape mitigation

Figure 5.3 Phase 2b proposals

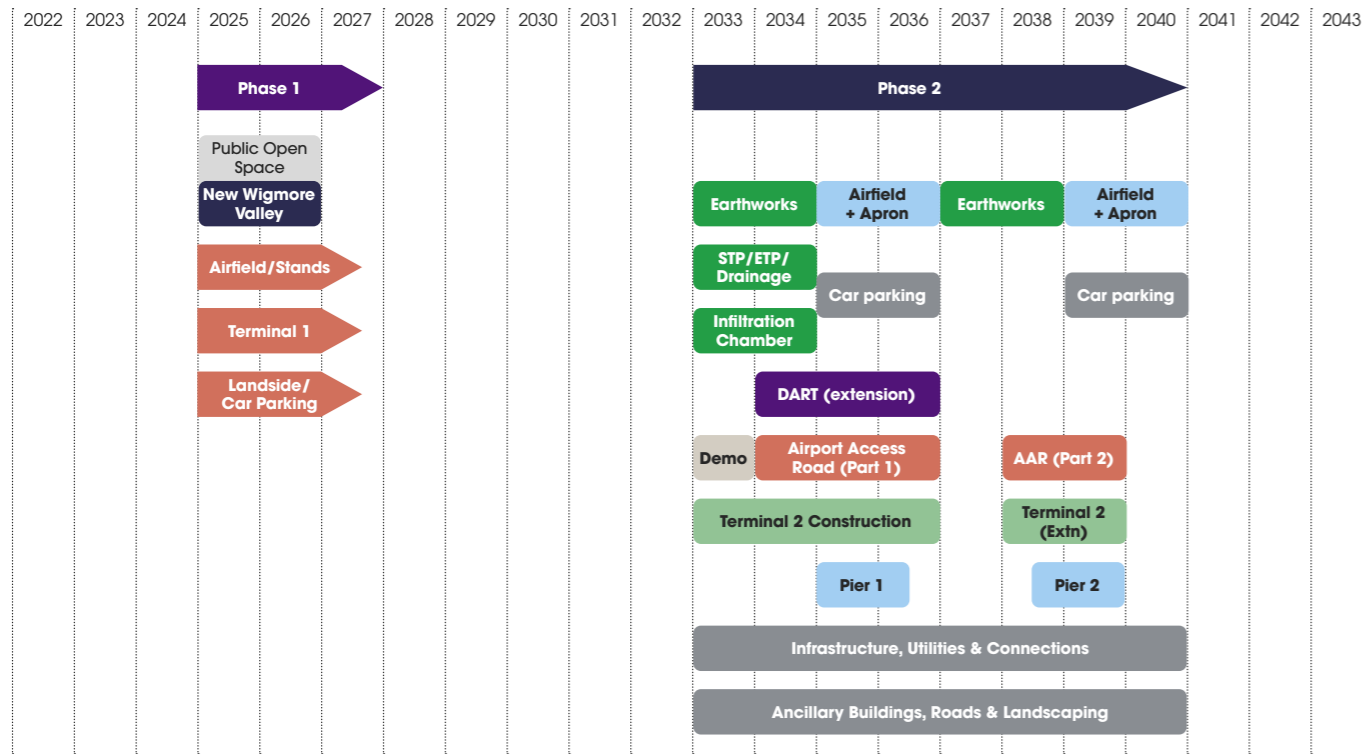


- KEY**
- Proposed Development Boundary
  - Local Authority Boundary
  - - Green Belt Boundary
  - █ Existing runway
  - █ Existing apron/taxiways/links
  - █ Existing airport terminal, associated buildings and support facilities
  - █ Existing highways
  - █ Proposed apron/taxiways/links and airport equipment
  - █ Proposed Engine Run-up Bay
  - █ Proposed airport support facilities
  - - Proposed fuel line
  - █ Proposed onsite highways works
  - █ Proposed replacement open space and landscape mitigation
  - █ Proposed terminal and associated works
  - █ Proposed parking

## Phasing and construction timeline

The construction of the new terminal and its associated facilities is likely to commence in 2033, on a four-year programme. Terminal 2 is expected to open in time for the Summer of 2037, which will increase overall capacity of the airport to 27 mppa. Construction activities would continue for a further four years after this.

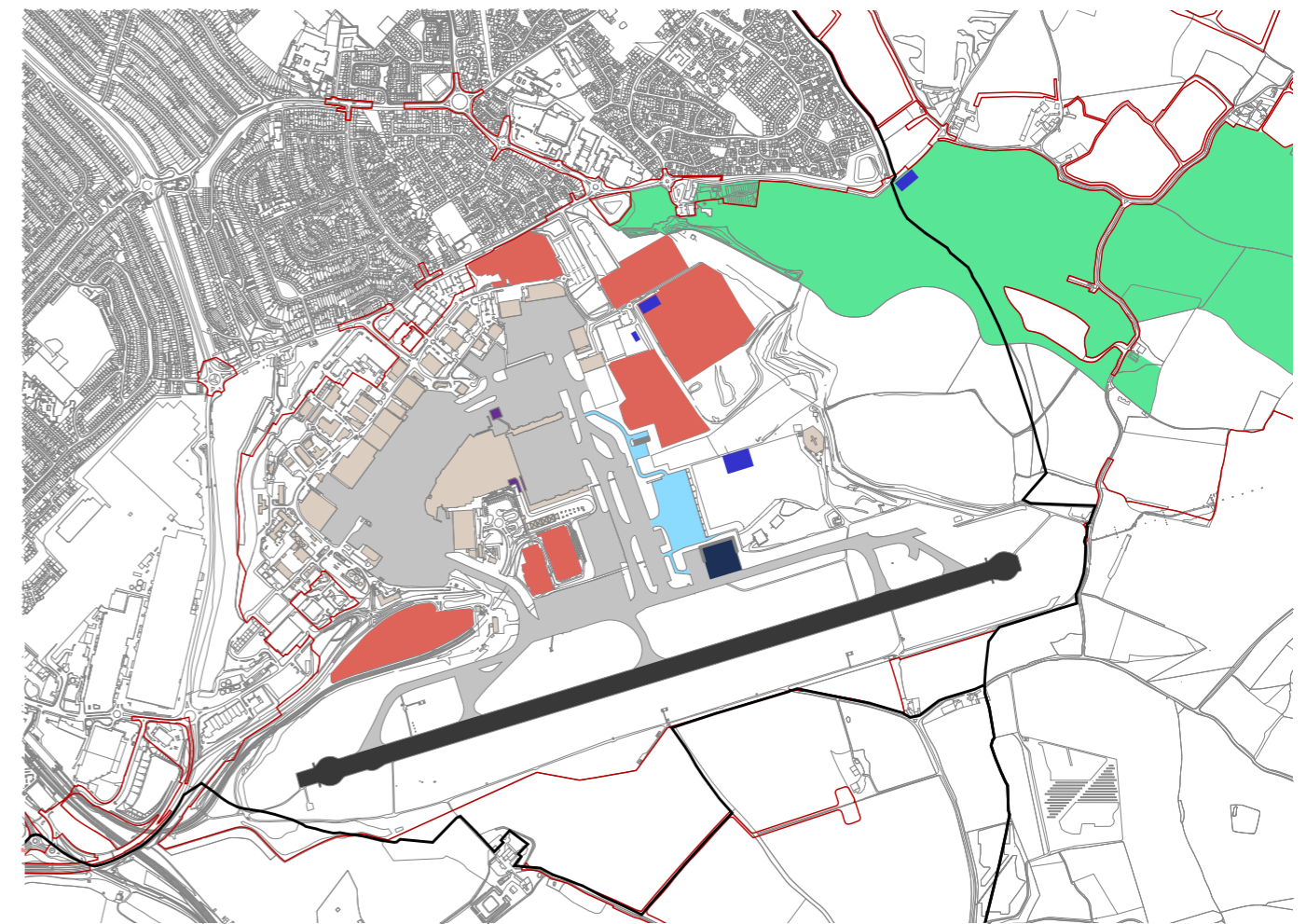
Figure 5.4 Construction timeline



Indicative timeline only, subject to alteration as our proposals develop

## Phase 1

Figure 5.5 Construction activity in Phase 1



### KEY

- Proposed Development Boundary
- Existing airport terminal and associated buildings
- Proposed parking
- Local Authority Boundary
- Construction compounds
- Proposed Engine Run-up Bay
- Runway
- Proposed apron/taxiways/links
- Proposed replacement open space and landscape mitigation
- Existing apron/taxiways/links
- Proposed terminal and associated works

## Phase 2

Figure 5.6 Construction activity in Phase 2a

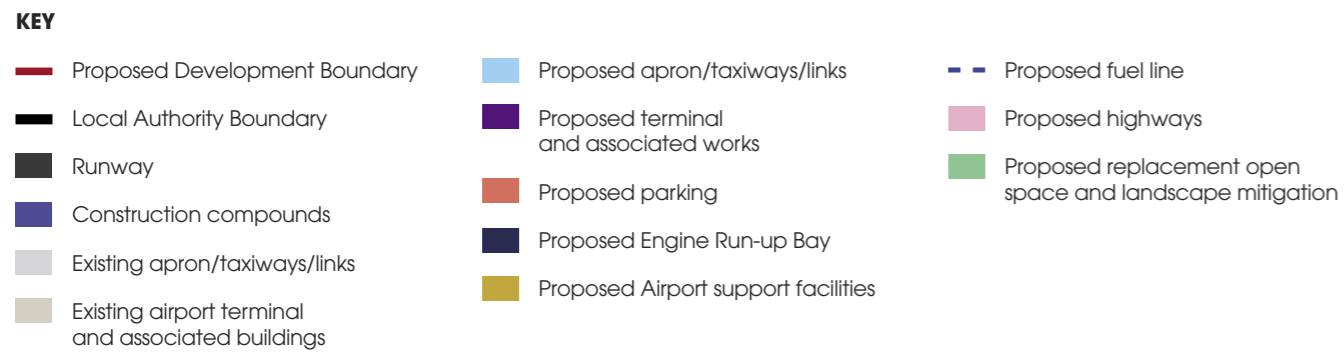
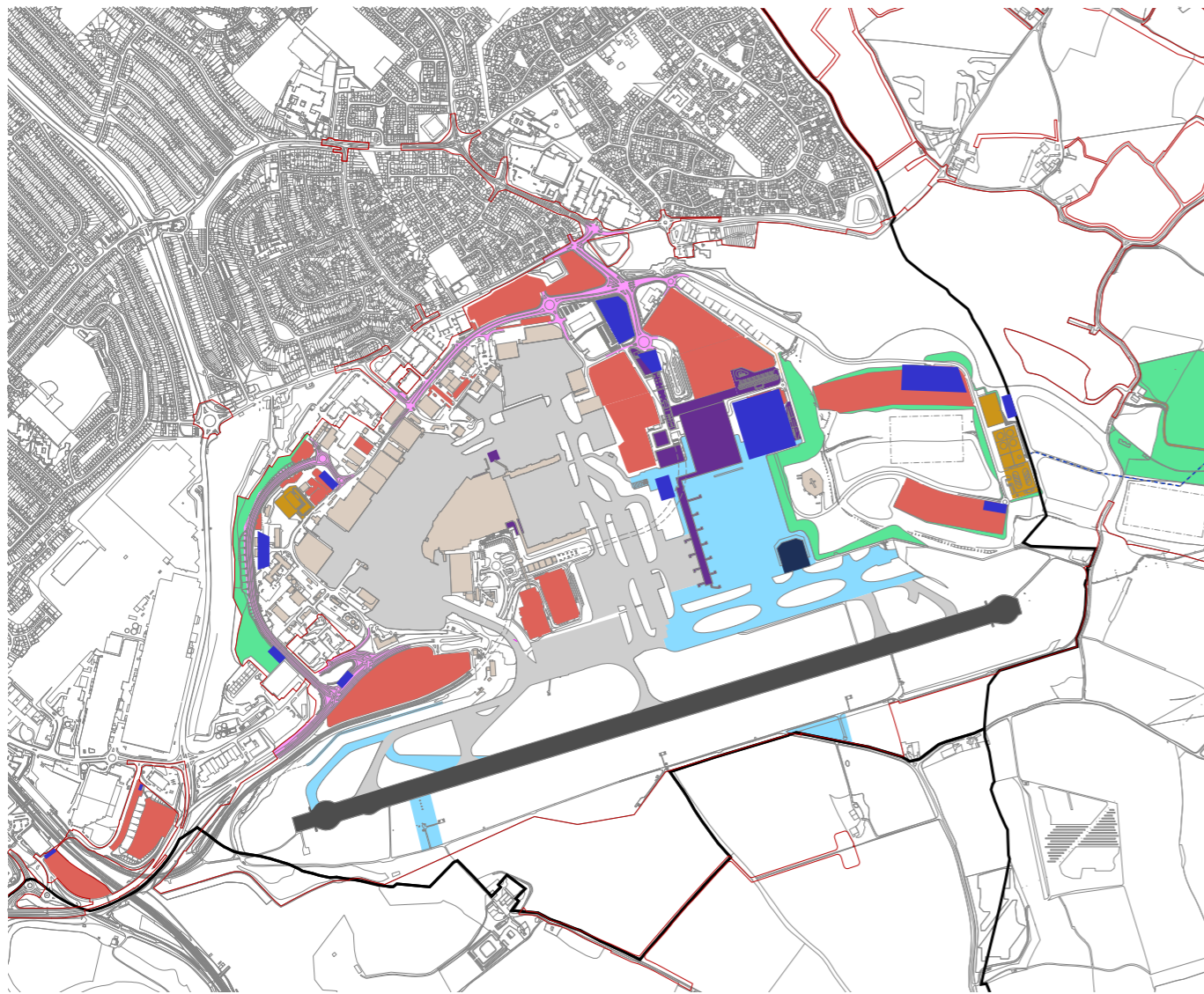
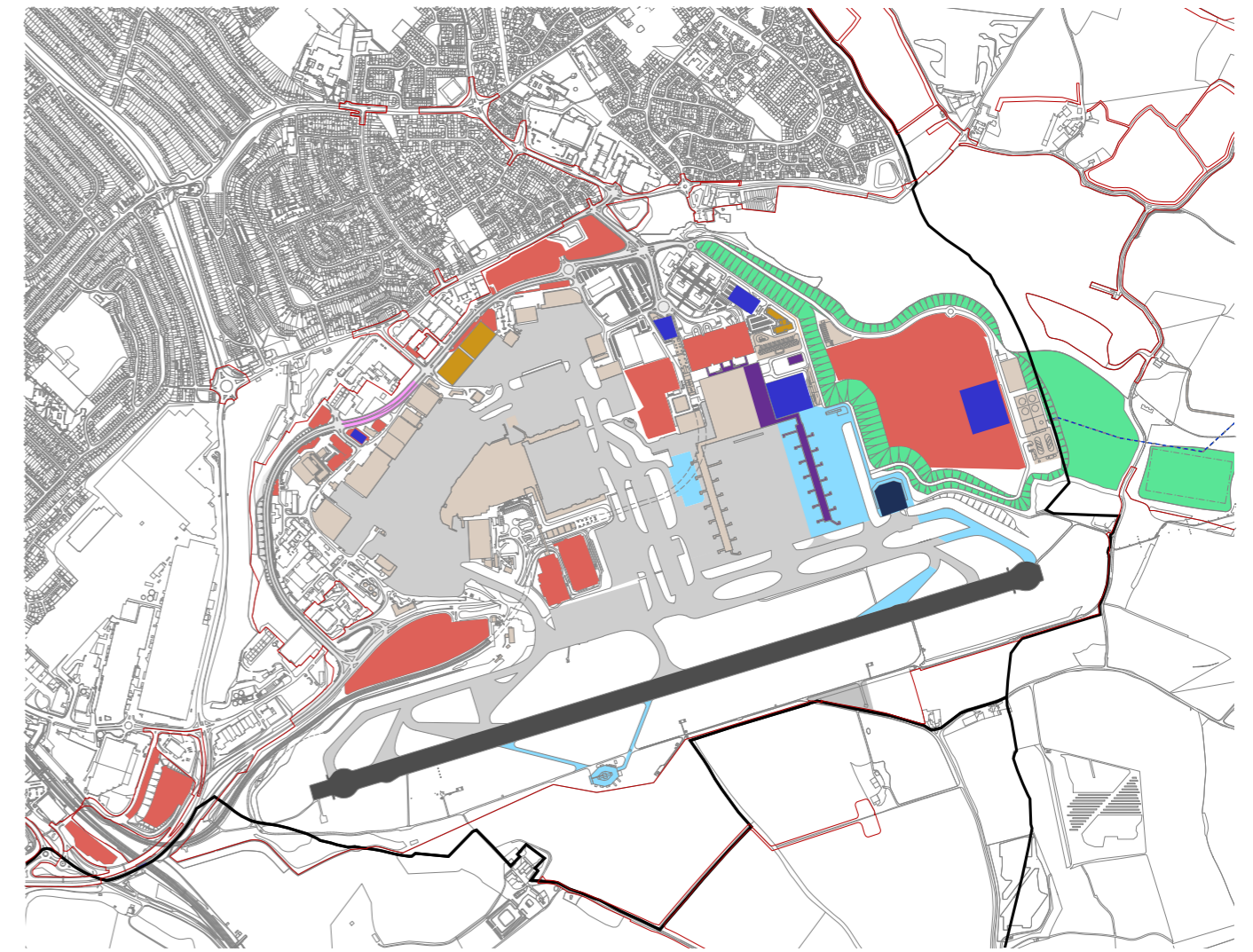


Figure 5.7 Construction activity in Phase 2b



## Earthworks

Since 2019, we have reduced the amount of earthworks needed by 50%. However, to construct a new terminal, major earthworks would still be required across a number of phases, comprising the following:

- The preparation of a suitable site platform so the expanded airport will be level with the runway
- Profiling of the landholdings, after excavation activities, for landscaping and to accommodate drainage installations and long-stay car parking

Our earthworks scheme aims to make the best use of our landholdings immediately adjacent to the existing airport to provide materials to support the proposed infrastructure, and to provide park amenities for local communities, including open space for recreation, wildlife, and plants.

From the consultation feedback we have received, we know that it is preferable for the earth to be taken from close to where it is needed. This will mean changes to the local topography, but the feedback we received was that this was preferable to the large number of vehicle movements that would be required to import up to 3,500,000m<sup>3</sup> of material for the overall scheme by road (equivalent to the volume of three Wembley Stadiums), which would involve continuous lorry movements every working day for up to four years. This would have been a significant extra traffic burden on the local area.

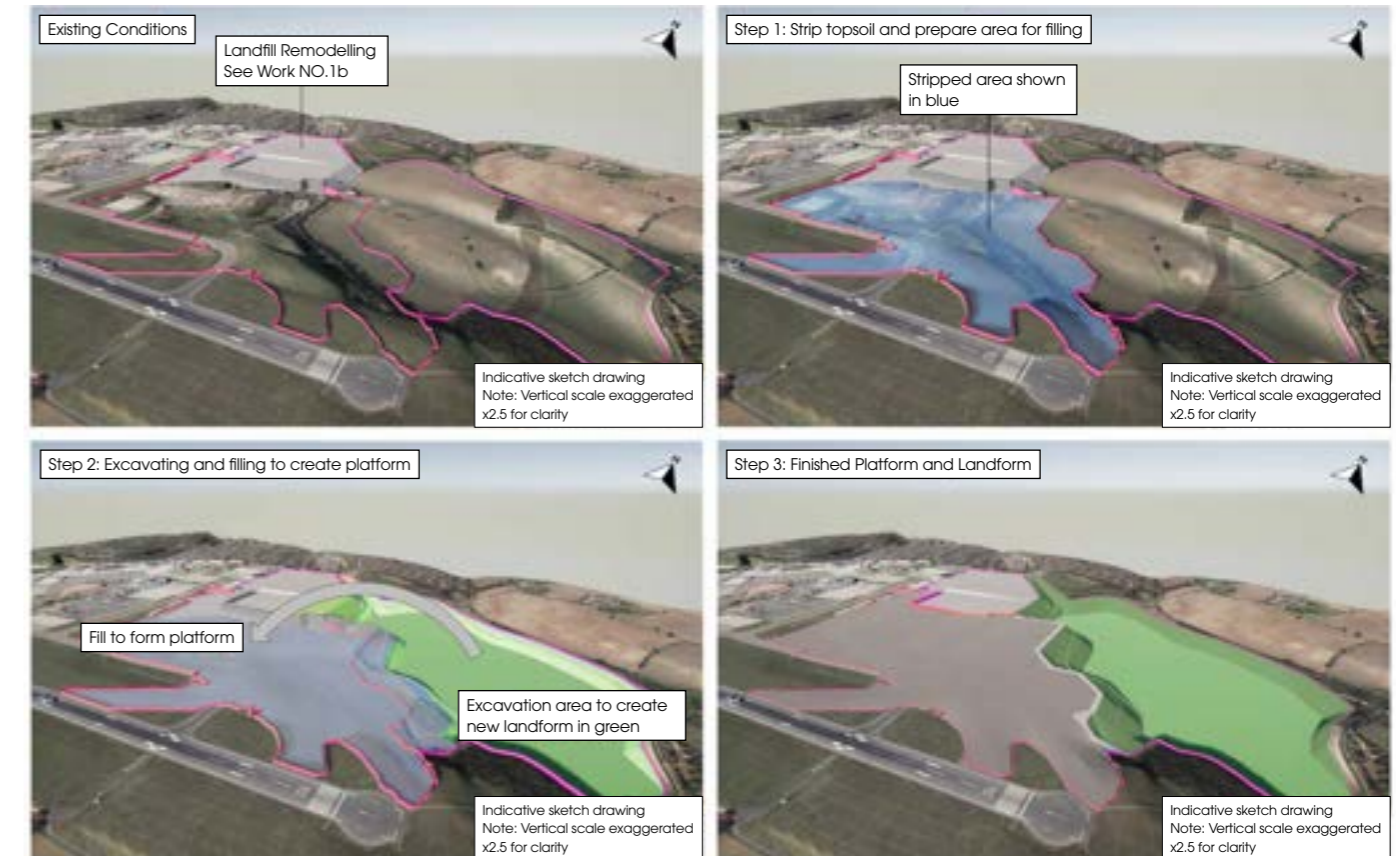
Using material from the site means that each phase of the earthworks can be done in as little as a year. As a result, the works can be carried out in an efficient way, minimising the impact on residents.

Works will be undertaken in a closed site so there will be no need to move the majority of the material on local roads. Best practice will be employed to carefully control noise, dust and odour in affected areas.

In setting the levels for the aircraft stands and apron, we have been able to determine the necessary landscape changes to the existing land adjacent to the airport. This in turn has determined the areas and depths to which we need to excavate elsewhere on the site to provide the necessary fill material.

Overall, we need to provide a large amount of material from land adjacent to the airport to avoid importing material for that purpose.

Figure 5.8 Proposed earthworks cut area



## Construction management

We are committed to being a good neighbour as we expand the airport. A lead contractor would be appointed to manage and oversee the construction of the project, including managing the flow of construction vehicles and timing of activities to mitigate any impact on the existing community and airport operations. You can read more about our approach to construction in **Chapter 4 of the PEIR** and the Construction Method Statement and Programme Report included in **Appendix 4.1 of Volume 3 of the PEIR**.

In order to assist in keeping local communities informed, 24 hours a day, 365 days per year, a helpdesk number would be made available to answer and help with any problems which may arise during the construction period.

## Deliveries

We propose to allocate a specific day and a time slot for most deliveries to site. This schedule of deliveries would be planned in consultation with local communities and would avoid daily peak passenger traffic times and minimise the impact it would have on the local and regional road network.



We would only employ contractors who are Fleet Operator Recognition Scheme (FORS) Gold accredited operators for the delivery of materials to the airport. This would ensure that the fleets of vehicles are driven safely with respect to pedestrians, cyclists and other vulnerable road users.

FORS is a voluntary accreditation scheme for fleet operators which aims to raise the level of quality within fleet operations, and to demonstrate which operators are achieving best practice in safety, efficiency, and environmental protection. Accreditation is only awarded to exceptional operators who have met exacting targets and will actively promote the FORS standard to their supply chain.

### Construction Traffic Management Plan

An important element in the control of any potential adverse environmental effects during the construction phase caused by increased traffic movements will be the preparation and implementation of a detailed Construction Traffic Management Plan (CTMP). This will set out the arrangements and management practices that will be adopted to minimise the impact of increased traffic on the local road network.

Closure of local roads and footpaths will be minimised as far as possible during construction. Diversion routes and temporary access for our neighbours will be provided, where required, in consultation with local communities and other road users.

We would identify suitable access routes to our site, which all construction traffic will adhere to. We would make appropriate design decisions which reduce the pressure on the local network. For example, our current proposal for the construction of the Airport Access Road provides sufficient space for traffic to continue to use the existing road during its construction.

### Working hours

Most of the construction work would be carried out during normal construction hours – Monday to Friday, 8:00am to 6:00pm, and Saturdays, 8:00am to 1:00pm.

Where working is required outside of the above hours, due to unforeseen circumstances or planned work that can only occur outside of the core hours (for example road closure requirements or continuity of working on large concrete pours or excavations where the working pattern may include night and weekend working), this would be done in consultation with the relevant local authorities, where required, and appropriate notifications would be provided.

### Site staff management

The site staff management team would be responsible for finalising the construction phasing and delivering the construction schedule. The site team would coordinate the project's delivery with multiple design teams and various construction oversight teams.

### Managing environmental impacts during construction

Consideration of the environmental impacts would be given the highest priority during construction. At all stages, priority would be given to construction practices that reduce potential environmental impacts, such as disturbance from construction noise, light, visual and air pollution, and traffic. Appropriate mitigation measures would be adopted, such as dust suppression systems, wheel-washing systems, and screening for noise. We would continue to review construction methods to establish where it may be possible to avoid or reduce impacts. Material and waste would be managed in accordance with a Materials Management Plan, Site Waste Management Plan and where required, an environmental permit.

A stakeholder communications plan will be developed, and implemented, as part of the Code of Construction Practice (CoCP) before works commence on site in order to record and respond to any complaints received, in line with the complaints procedure. Works notifications will also be issued to nearby properties to ensure those living near the scheme are made aware of the upcoming works taking place.

**A description of the environmental management and mitigation measures to be employed during construction is provided within the Draft Code of Construction Practice (Appendix 4.2 in Volume 3 of the PEIR).**

To promote efficiency on site, we propose to create a main construction compound along with smaller satellite compounds. The final locations of these compounds are yet to be confirmed and will be chosen to support the safe and efficient movement of materials to and from our site. The location of all the compounds would be within the construction zones, details of which can be found in the Construction Method Statement and Programme Report provided as **Appendix 4.1 in Volume 3 of the PEIR**.

The layout of compounds would vary depending on the construction requirements, but will typically incorporate offices, equipment storage and maintenance, materials storage, staff accommodation, vehicle parking and welfare facilities among others. All the compounds will be located to mitigate disturbance to local communities and sensitive areas wherever practical.



## 06 Managing and mitigating the effects of expansion

In the following section, we identify some of the key impacts that expanding an airport can have, and how we are proposing to manage and mitigate them. Local and regional environmental and social sensitivities have been a key consideration in the development of our proposals.

We have gathered extensive environmental information and are in the process of identifying likely significant environmental effects. We are developing measures to avoid, reduce, or mitigate any adverse impacts and also proposing opportunities to provide environmental enhancements. This process is known as an Environmental Impact Assessment (EIA). The full results of the EIA will be presented in an Environmental Statement, which will be submitted with our application for development consent. Our findings to date are set out within the **Preliminary Environmental Information Report (PEIR)**.

The purpose of the PEIR is to provide preliminary information on the likely significant environmental effects of the development, so people can make informed responses to our consultation. The EIA process, as reported so far within the PEIR, involves identifying potential 'receptors or resources' (including people, historical buildings, community facilities, businesses and the natural environment) that could be affected by aspects of the scheme, and their sensitivity to change.

The EIA identifies measures to avoid or reduce negative impacts, and these are known as mitigation measures. The EIA then assesses the effectiveness of these measures and identifies the extent of impacts with these measures put in place. Impacts are identified as adverse (i.e. negative) or beneficial (i.e. positive) and classified into 'significant' and 'not significant' effects on the basis of the predicted magnitude of impact and the sensitivity of receptors.

## PEIR

This is the document in which we describe our assessments of all environmental effects that our development could cause, and how we propose to manage and mitigate them, so that people can provide informed responses to our consultation. You can read the full report on our website or at our document inspection venues. This section of the consultation brochure provides a summary of each issue.

Each subsequent section states where likely significant and not significant effects have been identified in the EIA, as reported within the PEIR, taking into account any proposed mitigation measures.

## Agricultural land quality and farm holdings

### Aspects of our proposals that could cause effects

The scheme would use agricultural land to the east of the existing airport. This land is owned by us and some of this land is currently being farmed by a single farming business under a tenancy agreement.

Approximately half of the agricultural land to be built on is classified as Best and Most Versatile agricultural land, which is of high value for agricultural use. Therefore, the scheme would inevitably result in the loss of this agricultural land resource, which is considered to be a significant effect.

### Measures for reducing potential effects

We propose to manage the agricultural land under a new agricultural tenancy which will retain some areas in agricultural use during Phase 1. All land would be taken out of arable production during Phase 2 to provide new areas of habitat creation. However, the neutral grassland provided as biodiversity mitigation is potentially reversible, i.e. the grassland could be returned to its former agricultural use by future generations, if required. Furthermore, we will develop a Soil Management Plan to reuse topsoil and subsoil from the site within the design of our development, where feasible (an outline version of this plan is included within **Appendix 6.6 in Volume 3 of the PEIR**). By doing this, we will seek to minimise effects on the soil resource.

Chapter 6 of the PEIR provides further information on the likely effects associated with agricultural land quality and farm holdings.

## Air quality

### Aspects of our proposals that could cause effects

We have assessed the extent to which the scheme could impact on air quality due to emissions from construction traffic, dust from construction and demolition works. Once operational, we have considered the extent of increased emissions due to increased staff and passenger journeys to and from the airport on the road network, aircraft engines and vehicles operating at the airport, and other airport activities, such as fire training and engine testing.

To inform the assessment, we have utilised data from an air quality monitoring station located at the airport that is measuring a range of potential pollutants wider than that monitored by any other major airport in the UK. In addition to monitoring nitrogen dioxide (NO<sub>2</sub>) and particulates, we are also monitoring sulphur dioxide, carbon monoxide, ozone, black carbon and volatile organic compounds, such as benzene, naphthalene and toluene. All of these pollutants can be harmful to human health depending on the concentration. Air quality monitoring data from the station is publicly available in near real time on the website: [\[REDACTED\]](#)

Additional monitoring is also being undertaken at the airport and at nearby residential areas, to supplement monitoring carried out by LLAOL, Luton Borough Council and other local authorities.

One of the key air quality issues we are considering is the emission of NO<sub>2</sub> gas. The gas is produced from the combustion of petrol, diesel and aviation fuel. Production of NO<sub>2</sub> by road traffic is a major source of pollution and has led to Air Quality Management Areas being declared in Luton, Hitchin, Dunstable and St Albans. Despite this, monitoring has demonstrated that existing NO<sub>2</sub> concentrations at the locations representative of where people live are below the UK air quality standards set out in legislation. Concentrations monitored close to the airport, in the car parks and on the apron are comparatively higher, but these are away from residential properties and therefore not representative of where people live.

### Measures for reducing potential effects

We are committed to minimising emissions from the construction and operation of the expanded airport, as far as practicable.

The Draft CoCP sets out measures to minimise and control emissions during the construction period, including requiring contractors to control and limit dust, air pollution, odour and exhaust emissions during the construction works.

The Draft CoCP includes measures such as, but not limited to, the following:

- A Dust Management Plan will be developed and implemented to minimise construction dust from the works, including measures to minimise dust from the operation of construction vehicles, machinery, earthworks, construction activities and trackout;
- Regular monitoring of dust will be undertaken on and off-site throughout the construction works, with cleaning of surfaces to be provided, if required;
- A stakeholder communications plan will be developed and implemented before works commence on site, in order to record and respond to any complaints received with regards to dust or air quality impacts; and
- A Construction Traffic Management Plan and a Construction Workforce Travel Plan will be implemented for the sustainable delivery of goods and materials, and to encourage sustainable travel of the construction workforce to the site. In addition, during Phase 2 the new Airport Access Road incorporated within the scheme will provide road traffic routes away from sensitive receptors for access to the site.

To minimise and manage emissions during operation, a Draft Air Quality Plan has been prepared (refer to **Appendix 7.2 of Volume 3 of the PEIR**). This sets out measures to reduce emissions from:

- Aircraft;
- Airside vehicles;
- Surface access;
- Energy and fixed plant;
- Miscellaneous emissions; and
- Odour emissions.

We are proposing to implement the following measures to tackle aircraft and airport emissions:

- Providing fixed electrical ground power at the stands so aircraft can minimise the use of their auxiliary engines when on the ground.
- Encouraging airlines to use their newest and most efficient aircraft and the take up of sustainable aviation fuels.
- Working with the National Air Traffic Service and airlines to reduce hold times in the air and on the ground.
- Encouraging the operator to update the fleet of ground support equipment that operates on the airport aprons to a low or zero-emission fleet, such as a fleet of electric powered vehicles.
- Introducing binding limits on the airport's air quality impacts as part of our Green Controlled Growth initiative (see page 49 for more detail).

We are also proposing to make it easier for passengers and airport employees to travel by public transport to and from the airport, with the aim for 45% of passengers travelling to the airport using public transport and other sustainable modes of transport by 2039.

Furthermore, we will encourage the use of low and zero-emission vehicles by providing charging points for electric vehicles to keep pace with the increasing demand by employees and the electric vehicle charging preferences of car driving visitors, taxi companies, and public service vehicles.

In terms of energy use within the airport, reliance on fixed combustion plant will be reduced and zero emissions plant provided, where permissible.

Our preliminary assessment demonstrates that, with mitigation in place as described above, airport expansion would have no significant effect on existing air quality during construction or operation.

**The Draft CoCP can be found in Appendix 4.2 of Volume 3 of the PEIR.**

**Chapter 7 of the PEIR provides further information on the air quality assessment undertaken to date.**

## Biodiversity

### Aspects of our proposals that could cause effects

In addition to the existing airport infrastructure and Wigmore Valley Park, the site includes previously undeveloped land that is either in agricultural use or is being managed as grassland, with hedgerows, trees and shrubs located on field boundaries. Occasional woodland blocks, tree belts, areas of scrub and grassland are also located within and adjacent to the site boundaries.

The area includes three sites locally designated for nature conservation, the Wigmore Park County Wildlife Site, Winch Hill Wood County Wildlife Site and Local Wildlife Site, and Dairyborn Scarp District Wildlife Site. Winch Hill Wood is also designated as ancient woodland. Ecological surveys undertaken to date have demonstrated that the site and the surrounding area is home to a number of protected or notable species, including badgers, bats, brown hares, hedgehogs, slow worms, common toads, common frogs, smooth newts, Roman snails, other invertebrates and a range of birds including barn owls and red kites.

Field surveys have identified populations of orchids at the Wigmore Park County Wildlife Site and other notable plants within the site. Botanical surveys undertaken across the site have confirmed the presence of wildlife habitats such as ancient woodland, broadleaved semi-natural woodland, ancient and veteran trees, species-rich hedgerows, semi-improved neutral grassland and calcareous grassland. Various non-native invasive species have also been identified across the site, including Japanese knotweed, Japanese rose, and cotoneaster species.

We have assessed the extent of direct physical effects from the scheme on biodiversity due to construction on currently undeveloped land, and subsequent loss of foraging, commuting and shelter opportunities for a range of protected and notable species. We have also assessed the potential for indirect effects due to disturbance during construction and operation from impacts such as noise and light spill. For instance, the construction of the scheme would result in the direct loss of approximately 15.38ha (almost 100%) of Wigmore Park County Wildlife Site and approximately 2.18ha (29%) of Dairyborn Scarp District Wildlife Site. Winch Hill Wood County Wildlife Site and Local Wildlife Site and ancient woodland would be retained but may be subject to indirect effects.

### Measures for reducing potential effects

Where possible, the scheme is being designed to avoid or reduce adverse effects on valued ecological features and deliver benefits for biodiversity in accordance with policy and best practice.

Overall, the scheme would deliver a minimum of 10% biodiversity net gain through the extensive landscaping and habitat creation proposals incorporated within the scheme and the management of retained and proposed habitat areas. Biodiversity net gain is an approach which aims to leave the natural environment in a measurably better state than it was found. The landscape design for our scheme includes large areas of habitat creation on and off-site to partially mitigate the loss of habitats from construction and contribute to the project's target of achieving a net gain in biodiversity.

Much of the habitat creation will be provided within a large area of replacement open space that will be designed to mitigate for the loss of Wigmore Park County Wildlife Site and its habitats. Existing vegetation, including woodland and hedgerow belts on the boundary of the scheme, will be retained wherever possible and a 15 metre buffer zone maintained around areas of ancient woodland and veteran trees to avoid damage to roots. Orchids will be moved from the Wigmore Park County Wildlife Site to a suitable new site within the large area of replacement open space, with measures taken to protect them from being trampled, and another in the habitat creation area. New habitat features will be provided in the form of deadwood in open areas for insects, and artificial bat roosting and bird nesting boxes on buildings and

retained trees. Habitat creation measures for barn owls and red kites will be provided at a safe distance from the airport, to avoid increasing the risk of bird strike. Such measures will include the creation of grassland, hedgerows and woodland. Opportunities will also be sought to provide barn owl nesting boxes within the wider landscape at a safe distance from the scheme, and to provide alternative barn owl nesting opportunities to those lost to construction of the expanded airport.

A Landscape and Biodiversity Management Plan is being developed to establish, manage and monitor areas of habitat created (a draft version of this plan is included within **Appendix 8.2 in Volume 3 of the PEIR**). The scheme will use directional lighting to avoid light spill onto retained and adjacent habitats to minimise disturbance of nocturnal species, such as bats and badgers, and also to reduce glare for nearby residential areas. Best practice construction environmental management measures will be implemented to minimise disturbance during construction, as described in the Draft CoCP.

Detailed mitigation strategies will be developed that outline species-specific mitigation measures. Where badger setts or bat roosts would be lost or disturbed by the expanded airport, a Natural England licence would be sought, which is likely to require the provision of replacement artificial badger setts and artificial bat roosts. In addition to these mitigation measures, we are exploring potential enhancement measures, such as the enhancement of species-poor/defunct hedgerows and woodland creation to improve connectivity within the wider landscape.

With mitigation in place, including the provision of replacement habitats and planting, it is considered that significant adverse effects on biodiversity can be avoided.

**Chapter 8 of the PEIR provides further information on the likely effects on ecology and biodiversity and the mitigation measures proposed.**

## Climate change resilience and adaptation

### Aspects of our proposals that could cause effects

Climate change is a global risk, and we are all faced with the challenge to cut greenhouse gas emissions and adapt to the changing climate.

We acknowledge that the scheme will result in additional greenhouse gas emissions which would contribute to climate change. Greenhouse gas emissions from the scheme, and measures proposed to reduce emissions, are further discussed on pages 120 to 122 of this brochure.

The airport must also be resilient to the changing climate. We have assessed how vulnerable each element of the scheme is to a range of different climate change variables, such as increased temperatures, and the increased frequency of droughts and extreme weather events, such as storms and periods of intense rainfall. All existing airport infrastructure would be maintained in line with LLAOL's existing and future Climate Change Adaptation Reports. We have also considered whether the environmental effects of the scheme could become worse because of climate change.

### Measures for reducing potential effects

To increase the resilience of the scheme to the projected impacts of climate change, we are designing buildings, infrastructure and open spaces that can withstand extreme weather events, including hotter and colder temperatures and storm events, and designing a drainage strategy to account for more intense rainfall events. During construction, contractors would also be required to plan for extreme weather events. With measures embedded within design, and good practice construction management in place, any significant effects from the changing climate can be avoided.

As the design of the scheme evolves, we will continue to review its resilience to climate change and consider any new information that becomes available, such as LLAOL's updated Climate Change Adaptation Report being submitted as part of the UK government's third round of the adaptation reporting. This was not available at the time of the preliminary assessment.

**Chapter 9 of the PEIR assesses the vulnerability of the scheme to climate change.**

## Cultural heritage

### Aspects of our proposals that could cause effects

Luton and the surrounding areas show evidence of human occupation since the Palaeolithic era, concentrated in river valleys, uplands areas and around water bodies. The area remained largely in agricultural use until the 20th century, preserving archaeological remains, including Iron Age and Roman settlements. After the First World War, the aviation industry became a driver of change within the area. Some of the pioneering work in aviation technology took place at Luton in the inter-war period. The airport was established in the 1930s and, over the course of its development, several assets of heritage value have been identified in the area, including some related to the airport itself, such as a Second World War pillbox (part of the old airfield battle headquarters) and the London Luton Airport Fire Station. The study area includes a variety of designated and non-designated heritage assets, including one scheduled monument (Someries Castle), two registered parks and gardens, six conservation areas and a number of listed buildings.

We have carried out archaeological evaluation works to the east of the existing airport to better understand the potential for archaeology within the boundary of the scheme. The evaluation confirmed that there is a potential for below ground archaeology to be present. The earliest feature found on the site during the evaluation works included a pit containing Neolithic pottery. A series of interconnecting ditches were also found, marking an enclosure where Iron Age features and a Roman building are located. Aerial photography and previous archaeological monitoring have identified two additional areas of crop marks which may represent another Roman building to the east of Winch Hill Farm. These features indicate that the site was in domestic and agricultural use in the late Iron Age to Roman Age. We are planning to undertake additional archaeological evaluation trenching works to improve our understanding of the potential archaeology to the east of the existing airport.

We have assessed the extent to which the scheme could result in physical impacts on heritage assets during construction, due to ground disturbance and excavation works. Furthermore, we have considered the potential for changes in the setting of heritage assets which could occur due to construction noise and visual intrusion from construction traffic and equipment. During operation, we have assessed the extent to which the airport expansion proposals could impact on heritage assets due to changes in their setting arising from the presence of the scheme.

Our preliminary assessment has identified that there is potential for significant effects on Luton Hoo registered park and garden and the Grade II listed Wandon End House and farmhouse buildings. The construction and operation of the expanded airport is likely to detract from the rural setting of these heritage assets, although disturbance during construction would be temporary. Further significant

Opposite: Luton Hoo Grade II\* Registered Park and Garden



effects have been identified due to the potential loss of buried archaeology within the site. In addition, effects on the identified Iron Age and Roman settlement within the site have been avoided through changes to the extent of earthworks required for the scheme.

### Measures for reducing potential effects

Although our expansion plans will affect parts of the existing historic environment, we will seek to avoid and minimise adverse effects, where possible. A description of our proposed mitigation strategy is provided within the draft Cultural Heritage Management Plan, included within **Appendix 10.6 of Volume 3 of the PEIR**. We are continuing engagement with statutory stakeholders for the development of our mitigation proposals. This is likely to comprise of a programme of archaeological excavation and recording of buried archaeology within the boundary of the scheme for the preservation by record of potential buried archaeology.

In addition, we have reduced the visual prominence of the scheme through the use of embankments, restoration of historic hedgerows, provision of planting, and by minimising light spill, where possible (please see the landscape and visual impacts section on page 125 of this brochure for more detail).

**Chapter 10 of the PEIR provides further information on the likely significant effects associated with cultural heritage**

## Economics and employment

### Aspects of our proposals that could cause effects

As discussed under the 'Benefits of expansion' section of this brochure, expanding the airport would provide employment opportunities and generate wider economic growth during both construction and operation.

Construction would generate new jobs from direct employment, but also in industries supporting the construction works, such as those supplying construction materials and services. It is estimated that over the construction period a total of approximately 620 full-time equivalent jobs would be directly supported. In addition, approximately 310 full-time equivalent jobs would be supported by indirect and induced employment. As such, it is estimated to bring significant economic benefits to Luton and the surrounding 'Three Counties' of Bedfordshire, Buckinghamshire, and Hertfordshire.

During operation, the scheme would generate jobs to support airport operations, airlines and other companies serving the airport and additional employment in supply chains. It is estimated that the scheme would directly support an additional 4,500 jobs at the airport by the time the airport is handling 32 mppa, up from 10,900 in 2019.

When indirect and induced jobs are considered, the total number of new jobs would be approximately 4,800 in Luton, 6,600 in the counties of Bedfordshire, Buckinghamshire and Hertfordshire, and a total of 12,100 across the UK.

Overall, the scheme is estimated to generate an additional £1.6 billion for the UK economy by the time the airport is handling 32 mppa, compared to if the airport expansion did not come forward, resulting in significant beneficial effects to the economy. The economic effects and the net effects after displacement are explained further in **Chapter 11 of the PEIR**.

### Further opportunities

We have developed a **Draft Employment and Training Strategy** in liaison with Luton Borough Council and other stakeholders which proposes actions and initiatives with a vision to create quality careers and make the airport an inclusive and aspirational place to work. These proposals include establishing an employment and skills hub at the airport as a one-stop shop for engagement with local education institutions and training providers, explore the creation of an onsite training centre for construction and operational phases, encouraging hiring of apprentices and trainees through procurement and working together with airport employers, enhancing outreach with local community groups and schools, and facilitating research and innovation related to the future of sustainable aviation and construction.



We will work with existing education bodies and employers in advance of construction to determine future skills requirements and gaps to help develop training programmes. As part of their selection criteria, contractors' ability to deliver social value will be considered – whether the contracts could deliver wider social, economic and environmental benefits. For the operational phase, a similar approach will be undertaken. In addition to what we have set out in the Draft Employment and Training Strategy, we expect that some of the employment growth will be taken up by existing airport employers and a number of these have bespoke training programmes. An employment charter or similar initiative for employers will be developed to work towards a set of agreed objectives that will include a focus on local employment and training initiatives.

In conclusion, the proposed expansion is likely to result in significant beneficial effects on the economy and we are exploring measures to enhance these benefits further, both locally and regionally.

**Further information on the assessment of likely significant effects on the economy and employment is provided within Chapter 11 of the PEIR.**

## Greenhouse gas emissions

### Aspects of our proposals that could cause effects

The UK government has announced a target of net-zero carbon emissions by 2050 and launched a consultation on the government's strategy to net zero aviation<sup>4</sup>. The aim of the government strategy is for "aviation to decarbonise in a way that preserves the benefits of air travel and delivers clean growth of the UK sector by maximising the opportunities that decarbonisation can bring". The strategy sets the net zero target for UK domestic aviation by 2040. In line with emerging policy, options to decarbonise airport ground operations will be pursued with the operator as part of the actions to reach net zero carbon. We are committed to achieving net zero carbon airport ground operations by 2040.

<sup>4</sup> Department for Transport (2021) Jet zero: our strategy for net zero aviation (Accessed 21 September 2021)

We have assessed the level of greenhouse gas emissions that would be produced by the scheme. Although the main source of greenhouse gases from an expanded airport would be from flights, we have also considered greenhouse gases that would be emitted by construction activities, surface access journeys and airport operations. The section below outlines measures proposed as part of the scheme to reduce greenhouse gas emissions.

### Measures for reducing potential effects

In order to minimise the airport's carbon footprint, we will do the following:

- During construction, contractors will be required to use materials with lower carbon footprint, and reduce emissions from waste, energy and water use.
- Any lost vegetation will be offset by the provision of new planting.
- New buildings and infrastructure will be designed to be energy efficient and measures will be incorporated into the design to reduce waste.
- Encourage the use of electric vehicles on the airfield.
- Emissions from airport operations will be reduced using low-carbon energy sources, such as on-site renewable energy generation, and measures to improve the management of waste and water.
- Emissions from aircraft operations on the ground will be reduced through the provision of fixed electrical ground power to standing aircraft, and single/reduced engine taxiing.
- Steps to reduce emissions from aircraft during the landing and take-off (LTO) cycle will be considered as part of the developing operational strategy. For example, single/reduced engine taxiing, electric towing, review/minimise use of auxiliary power units (APU), reduce emissions due to aircraft idling and hold.
- We will encourage the take up of sustainable aviation fuels/newer aircraft through operating policy/strategy.
- Use of public transport by passengers and employees at the airport will be encouraged through improvements to public transport connections, such as Luton DART, coaches and buses, and by limiting new car parking provision, ensuring that the amount of new car parking proposed aligns with the wider surface access strategy.
- Where private cars are used, we will encourage low/zero carbon private transport options e.g. electric vehicles.

Following the application of mitigation measures to reduce the generation of greenhouse gas emissions as far as reasonably practicable, offsetting of residual emissions is proposed to achieve carbon neutrality and to reduce emissions to net zero. As noted earlier in this section, the strategy sets the net zero target for UK domestic aviation by 2040. In line with emerging policy, options to

decarbonise airport ground operations will be pursued with the operator as part of the actions to reach net zero carbon. We are committed to achieving net zero carbon airport ground operations by 2040. The offsetting mechanism or schemes by which this will be achieved are currently under review and will be developed and reported with the application for development consent.

Whilst all greenhouse gas emissions are considered to be significant, the preliminary assessment demonstrates that with mitigation in place, emissions from the scheme are not considered to be so significant that they would impact on the UK's ability to meet its current carbon budgets, which lead the UK to net zero carbon emissions by 2050. Greenhouse gas emissions from the construction and operation of the scheme would represent between 2.3% and 3.7% of the Climate Change Committee carbon-cap for aviation emissions for the periods of 2023-2027 and 2028-2032 respectively, and 0.08% of the government's sixth carbon budget for the period of 2033-2037. We will use the Green Controlled Growth framework to monitor and control the scheme's greenhouse gas emissions, so that the target emissions for the scheme are not exceeded.

Our assessment of greenhouse gas emissions will continue to be updated to consider the latest proposals and the developing government policy on greenhouse gas emissions and net zero aviation.

**Chapter 12 of the PEIR provides an assessment of greenhouse gas emissions likely to be produced by the scheme.**

## Health and community

### Aspects of our proposals that could cause effects

We have considered the potential impacts of our proposals on local communities in Luton and the wider area that would be directly or indirectly affected by the construction and operation of the scheme. We have assessed effects on health and wellbeing which could occur as a result of noise, air quality, changes in traffic, light spill, landscape and visual effects but also benefits brought by increased employment opportunities and economic growth. Specifically, we have considered how the local community could be impacted

in relation to issues such as access to open space, recreation and physical activity; access to services; employment and income; housing; neighbourhood quality; aircraft noise; social capital; and perception and uncertainty.

Airport expansion is likely to result in indirect significant beneficial effects with regards to health and wellbeing from opportunities for employment, training and apprenticeships along with local and regional economic growth. However, the preliminary assessment has identified a potential significant adverse effect on mental health due to public concern and uncertainty around the planning and construction of the scheme. In addition, the Prospect House Day Nursery located on Prospect Way would need to be demolished for the construction of the new Airport Access Road, resulting in a potential significant adverse effect due to reduced service provision for childcare facilities.

We have assessed the likely effects of our proposals on the users of community resources within the vicinity of the scheme, including residential properties, schools, churches, leisure, sport and recreational facilities, and the network of public rights of way. During construction, public rights of way crossing the site will require temporary closure and diversion. However, alternative routes would be provided. Part of the existing Wigmore Valley Park will be lost however replacement open space will be provided in advance of any works to the existing park. The replacement open space will result in an overall increase in open space. Furthermore, existing facilities will be enhanced with footpaths being upgraded and new signage provided.

### Measures for reducing potential effects

The mitigation measures proposed for noise, air quality, traffic and transport, landscape, and visual effects would also result in the mitigation of effects on the health and wellbeing of the local population and the users of community resources. Discussions are taking place with the Prospect House Day Nursery to find a suitable site for relocation. During construction, the lead contractor will implement a community engagement plan in line with our objective to be a better neighbour.

**Chapter 13 of the PEIR provides further information on the health and community assessment.**

## Landscape and visual impact

### Aspects of our proposals that could cause effects

The airport is located to the south east of Luton on an elevated plateau and the land to the north of the airport is predominantly residential.

The land to the west includes a mixture of both industrial and residential uses and the land to the east and south is predominantly rural, with arable fields and woodland. The surrounding landscape is recognised for its local landscape value, has an extensive network of public rights of way and has several features valued for their amenity, heritage or ecological value. The Chilterns Area of Outstanding Natural Beauty (AONB) is located approximately 5km west of the airport. The existing airport is a prominent feature in views from much of the surrounding area and is also visible from long-distance views from the Chilterns AONB.

Our scheme would protect several valued landscape features and introduce extensive areas of new hedgerow, woodland and tree planting. The proposals would also:

- Substantially alter the landform to the east of the airport
- Remove an area of locally protected habitat (Wigmore Valley Park County Wildlife Site)
- Require an area of Wigmore Valley Park to be relocated
- Necessitate existing trees being felled
- Affect local tranquillity, and aesthetic and perceptual qualities of the local landscape
- Introduce built form that may be prominent in views from several locations
- Introduce potential light spill

We have considered the extent to which the scheme would be likely to lead to significant changes in the existing landscape and views. Removal of some elements of the existing landscape and alterations to landform is likely to result in significant adverse effects on the qualities of the existing landscape and the landscape character of the surrounding area. A potential significant adverse effect has also been identified on the Chilterns AONB as a result of the increase in Air Transport Movements (ATMs).

Significant effects due to changes to existing views are likely to occur from Wigmore Valley Park, Raynham Way Recreation Ground and Community Centre, Wigmore Hall, Eaton Green Road, Winch Hill Lane, Darley Hall, and nearby public rights of way. As the proposed planting matures over time, the effects on visual amenity would be reduced and in some cases, the new planting would provide enhanced visual screening.

As part of our proposal, an area of Wigmore Valley Park would be lost and replacement high quality open space of a greater area would be provided south of Darley Road. The relocation of the open space is assessed as having a significant adverse effect during the construction period; the planting within the replacement open space would be at an early stage of establishment and people would be aware of construction works to the south being undertaken during this period. As the landscaping matures, the replacement open space would provide an improvement in the long term.

### Measures for reducing potential effects

We have reduced the visual prominence and impact on the landscape from the scheme, where possible, through the following measures:

- The design of the scheme has evolved to avoid excavation on the ridgeline of Winch Hill or in land occupied by a Romano-British building, located within the field immediately to the south east of Wigmore Valley Park.
- The design additionally retains the existing entrance and eastern part of Wigmore Valley Park and integrates it into a new area of Replacement Open Space, to be provided over a larger area to the east of the existing park.
- Extensive planting including hedgerows, woodland, tree planting and wild flower grass seeding is proposed within the Replacement Open Space.
- New buildings will be similar in scale and character to the existing airport buildings. Subtle architectural surface finishes will be used to minimise visual impacts.
- Additional hedgerows with hedgerow trees and woodland are proposed within areas outside the boundary of the scheme to further screen the development and to reinstate historic field patterns previously lost as a result of agricultural practices, thus restoring lost landscape character.
- As much of the existing vegetation will be retained, as possible, including hedgerow and woodland planting, in order to screen the scheme. Furthermore, the design of the proposals would avoid impacting on ancient woodland at Winch Hill Wood and retain mature woodland/hedgerow vegetation at Winch Hill and, in part, on the south east boundary of the existing Wigmore Valley Park.
- Avoiding or reducing obtrusive light and minimising light pollution – we will model the potential light spill and design the lighting strategy to minimise light spill beyond the site boundary through the use of measures such as directional lighting and shielding. A preliminary lighting assessment of the current design proposals has been prepared and is appended to the PEIR (see **Appendix 5.2 in Volume 3 of the PEIR**). Measures to minimise light spill during construction are further described in the Draft CoCP.

- We have prepared a draft Landscape and Biodiversity Management Plan to set out measures for the upkeep of any existing and new planting (see **Appendix 8.2 in Volume 3 of the PEIR**).
- Improvements to Public Rights of Way within the surrounding landscape are also proposed, including upgrades to sections of existing tracks and improved signage.

**Chapter 14 of the PEIR provides further information on the landscape and visual impact assessment.**

### Emergency planning and resilience

We have identified potential risks associated with accidents and natural disasters within the context of the expanded airport and considered how resilient the scheme would be to these risks.

Our preliminary assessment identifies potential risks from major accidents and disasters, and considers measures required to mitigate these risks. We are continuing to engage with local emergency resilience forums, emergency planning managers and emergency services to assess the vulnerability of the expanded airport to major accidents and disasters and to develop measures to improve its resilience. Our assessment of potential risks is ongoing and we are working towards mitigating all risks to be as low as reasonably practicable, with no significant risks remaining.

**Refer to Chapter 15 of the PEIR for a description of the major accidents and disasters assessment and a description of the measures adopted to ensure the resilience of the scheme to these events.**

## Noise and vibration

### Aspects of our proposals that could cause effects

We acknowledge that noise is a key environmental concern for nearby communities. Noise associated with the airport is primarily caused by departing and arriving aircraft (referred to as air noise). We are also considering noise produced by aircraft on the ground, for example during taxiing and engine running, and increases in road traffic noise that may arise from the expansion proposals due to the increase in the number of vehicles. In addition, we are considering the potential for likely significant effects due to noise from construction works and traffic and due to ground-borne vibration, for example from piling works. A summary of the preliminary assessment undertaken for each of these issues is provided below.

### Air noise

We have assessed the likely significant effects associated with air noise from the expanded airport and undertaken noise modelling to determine the change in noise levels that would be experienced by local communities with or without the scheme coming forward. The assessment has been undertaken on the basis of current flightpaths to present a worst-case scenario, as upcoming changes to flightpaths are likely to introduce improvements with regard to noise exposure. See section 8 of this brochure for more information about prospective changes to flightpaths.

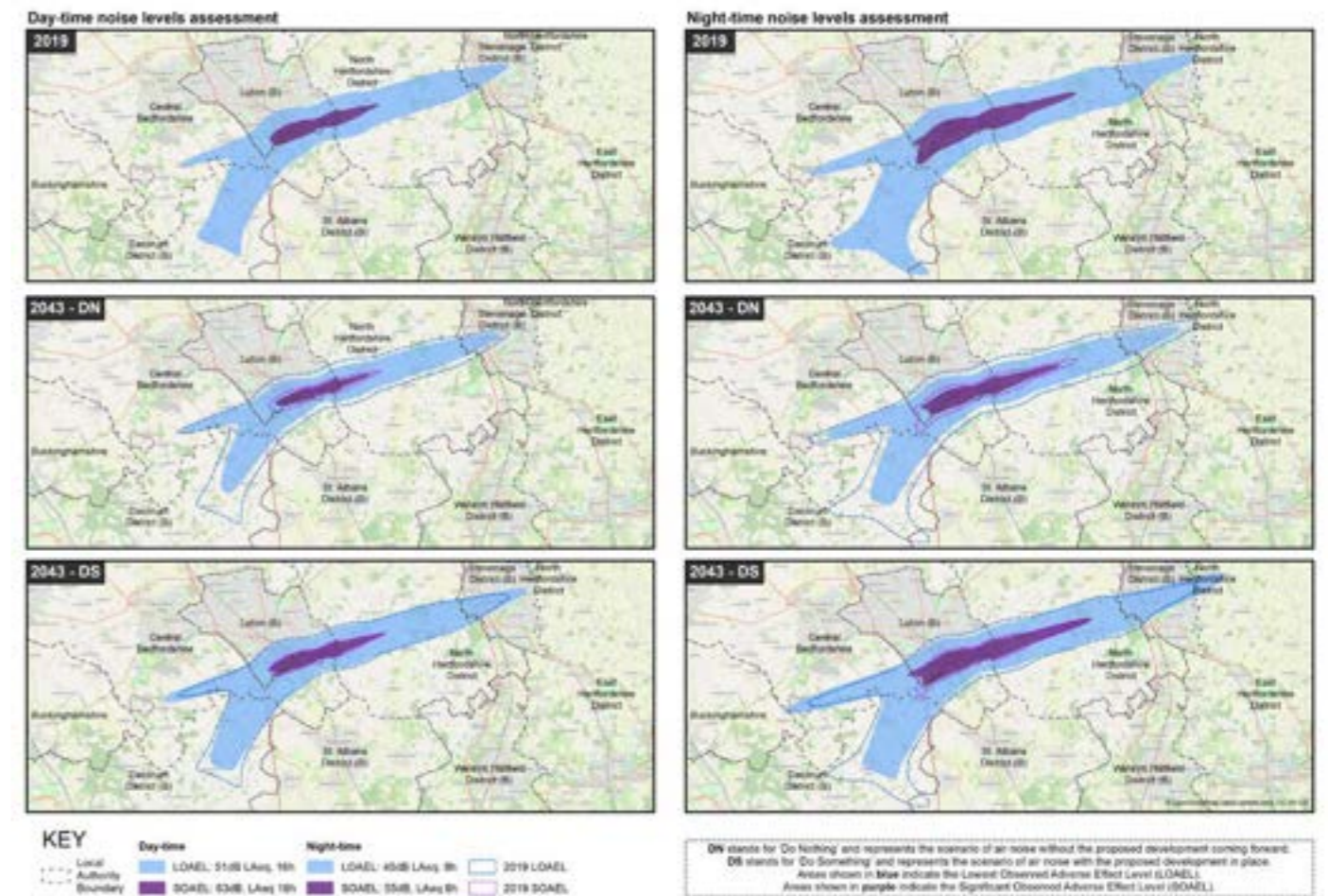
Air noise is assessed by calculating the average noise level over a 16-hour day (from 7:00am to 11:00pm) and 8-hour night (from 11:00pm to 7:00am) for an average day over a 92-day summer period. The average noise level is given in decibels (dB) and presented as noise contours that show the effect of aircraft noise. This averaged decibel measurement 'L<sub>Aeq</sub>', shown on a noise contour map, is the metric used to define UK aircraft noise and it refers to 'equivalent continuous noise level'.

For the assessment of noise contours, the concepts of Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) as defined in the Noise Policy Statement for England are used. LOAEL is defined as 'the level above which adverse effects on health and quality of life can be detected'. SOAEL is defined as 'the level above which significant adverse effects on health and quality of life occur'. The threshold for LOAEL for air noise is defined in the UK policy as 51 dB L<sub>Aeq,16h</sub> for day-time noise and 45 dB L<sub>Aeq,8h</sub> for night-time noise. The threshold for SOAEL is defined as 63 dB L<sub>Aeq,16h</sub> for day-time noise and 55 dB L<sub>Aeq,8h</sub> for night-time noise.

The maps on this page show the modelled noise contours of the airport during day-time and night-time for three scenarios:

- Representing the existing air noise from the airport.
- In 2043 without the proposed expansion works coming forward (i.e. with the airport operating at the current consented capacity but accounting for a reduction in air noise resulting from the ongoing upgrade of aircraft fleet).
- In 2043 with the change in air noise resulting from the proposed expansion.

Figure 6.1 Noise contours



Comparison of the existing air noise modelled for 2019 and the predicted air noise in 2043 shows that overall, even with the proposed expansion, there will be a reduction in the number of people who would experience significant noise effects due to aircraft noise. In total, 600 fewer people will be exposed to noise exceeding the SOAEL threshold during the daytime and 2,300 fewer people during the night-time period, when the modelled noise contours with the proposed expansion in 2043 are compared against the 2019 contours. This is due to quieter and more efficient aircraft that will be phased into the fleet.

If the 2043 noise contours with the scheme are compared against the 2043 noise contours without the scheme coming forward, the difference in air noise experienced by all receptors within the LOAEL and SOAEL areas shown within Figure 6.1 would be between 1 and 3 dB. Overall, it is estimated that in 2043 with the scheme coming forward, 1,100 people will be exposed to significant noise effects during the daytime and 800 people during the night-time period – these would be people residing in the SOAEL areas shown within Figure 6.1.

Households likely to experience significant effects as a result of the difference in air noise are currently eligible for a contribution to insulation under the current noise insulation scheme. Under the draft compensation scheme that would be part of our application for development consent, these properties would qualify for a full sound insulation package for habitable rooms.

### Measures for reducing potential effects

The following four principles of mitigating noise impacts established by the International Civil Aviation Organisation<sup>5</sup> have been considered, in the order set out below:

- **Reduction of noise at source – relating to improvements in aircraft technology to reduce aircraft noise.**
- **Use of land use planning and management – preventing new noise-sensitive development in areas affected by adverse levels of aircraft noise.**
- **Noise abatement operational procedures – such as continuous descents, continuous climb operations and optimal deployment of landing gear which can help reduce aircraft noise.**
- **Operating restrictions – limits on aircraft movements during specific periods.**

There are a range of measures already in place that address the noise impact of the airport, including the London Luton Airport Noise Action Plan (LLNAP) 2019-2023<sup>6</sup>. These measures include operational procedures such as continuous aircraft descents and climbs, operational limits and a noise insulation scheme. Further information on what the airport is currently doing to monitor, control and manage aircraft noise can be found at: [REDACTED]

<sup>5</sup> International Civil Aviation Organization (2001), Assembly Resolutions in Force.

<sup>6</sup> [REDACTED]

The airport currently operates under the following conditions that were set against the consented capacity of 18 mppa:

- **An area limit of 19.4 km<sup>2</sup> for the day-time 57 dB L<sub>Aeq,16h</sub> noise contour**
- **An area limit of 37.2 km<sup>2</sup> for the night-time 48 dB L<sub>Aeq,8h</sub> noise contour**
- **A maximum of 9,650 movements during the night quota period (11:30pm to 6:00am) for a rolling 12-month period**
- **A maximum of 7,000 movements between 6:00am and 7:00am for a rolling 12-month period**

We will also define noise limits and controls within which the airport would be allowed to operate as part of a Noise Envelope. For example, we are proposing to maintain the existing restrictions of 9,650 aircraft movements during the night quota period (from 11:30pm to 6:00am) to limit night-time aircraft noise levels.

A 'Noise Envelope' is a framework of legally binding and enforceable limits and controls to manage air noise. The government's Aviation Policy Framework and the Airports National Policy Statement promote the concept of establishing a Noise Envelope for the operation of airports, as a means of giving certainty to local communities about the amount of noise which can be expected in the future and to give airport operators certainty on how they can use their airports. The government expects that within the limits set by the Noise Envelope, the benefits of future technological improvements should be shared between the airport and its local communities to achieve a balance between growth and noise reduction.

A Noise Envelope will be established for the scheme through the Green Controlled Growth framework. The type and nature of the controls that will apply within the Noise Envelope would be influenced by the Noise Envelope Design Group (NEDG). The NEDG is independently chaired, and includes representatives from local authorities, the community and other stakeholders with the necessary technical expertise. It provides a means to engage in discussions on defining the Noise Envelope and reaching an agreement among stakeholders regarding its implementation. The NEDG has recommended how it expects noise controls to work for the proposed expansion and how they would be enforced. The implementation of the Noise Envelope would be secured through the DCO process.

Households likely to experience significant effects as a result of an increase in air noise may be eligible for noise insulation, subject to meeting the qualifying criteria. We will be substantially improving noise compensation proposals, should the DCO be granted, compared to the existing arrangements. We are proposing to offer a new tiered noise insulation scheme as part of our expansion plans. The schemes offer a range of packages for homeowners, dependent on the noise effects at their properties. They range from a full package of noise insulation to a financial contribution towards noise insulation, and are among the best offered

by any airport in the UK. Further details can be found in our **Draft Compensation Policies and Measures** document.

Low-cost airlines are expected to continue to dominate air traffic at the airport and these airlines typically replace their aircraft every eight to 14 years. We will continue to encourage our airline operators to upgrade their fleet from existing generation narrow body aircraft to newer generation aircraft, which are quieter and more efficient. The Airbus A320 NEO family of aircraft has already started to be introduced to the aircraft fleet at the airport. Similarly, cargo carriers will move to progressively quieter aircraft types over time. For example, we expect the Boeing-757 aircraft could be replaced by newer Boeing-737 aircraft, while the old and noisy Airbus A300 freighters could be replaced by quieter aircraft such as the Airbus A330 freighters, as increasingly operated by equivalent airlines.

We are also considering the extent to which the next generation of aircraft, including electric and hydrogen powered aircraft, could serve to further reduce noise levels over the longer term.

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. As part of this, adjustments to take flightpaths away from the population and to provide respite are also being assessed. See section 8 of this brochure for more information about changes to flightpaths.

### Aircraft ground noise

Our development proposals have been designed to reduce aircraft ground noise by providing additional taxiways and improving the use of airfield layout to reduce aircraft taxi time and queueing. The engine ground running bay for engine testing would be relocated within a specially-designed facility with acoustic screening. As we continue to develop our proposals, we are reviewing further locations for acoustic barriers to reduce the impact of aircraft ground noise.

Our preliminary assessment demonstrates that due to aircraft ground noise, residential properties adjacent to the airport would either experience a minor change in noise levels depending on their location in relation to the airport layout. However, these changes in noise levels are not likely to be significant.

### Road traffic noise

Increases in road traffic generated by the airport expansion have the potential to result in an increase in noise levels. Potential significant adverse effects are possible for properties in the vicinity of Tea Green and Cockernhoe as a result of increased traffic on Stony Lane and Chalk Hill although absolute road traffic noise levels are expected to remain relatively low. Further modelling



and assessment of these effects will be undertaken to develop appropriate mitigation. Elsewhere across the local area, road traffic increases are expected on most major routes but not to the extent that they would result in significant adverse effects in terms of road traffic noise during construction or operation.

### Construction noise and vibration

Our Draft CoCP, in **Appendix 4.2 of Volume 3 of the PEIR**, sets out management measures which will be adopted by contractors to minimise and mitigate noise and vibration during construction. For example, to reduce construction noise and vibration, quieter machinery and equipment will be used, and construction methods which are not inherently noisy will be adopted wherever practical.

With mitigation in place, and because of the distance between the scheme and sensitive receptors, construction noise and vibration effects are not likely to be significant.

### Operational vibration

Given the distance of residential properties from both the Luton DART that would be extended to Terminal 2, and also areas where aircraft would operate on the ground, no likely significant effects associated with vibration have been identified during the operation of the expanded airport.

**For further information on the assessment and mitigation of noise and vibration effects, please see Chapter 16 of the PEIR and Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR.**

## Soils and geology

### Aspects of our proposals that could cause effects

The geology of the site comprises man-made ground, Head deposits, Glaciofluvial deposits and Clay with Flints overlying chalk bedrock. The Wigmore Valley Park area and parts of the existing airport overlay a former landfill, which was operational between 1937 and 1978. The construction works would require a section of the former landfill to be excavated and material from it to be treated and reused on-site, where appropriate.

We have considered potential risks to human health arising from contaminated soils, landfill materials, groundwater and leachate due to direct contact, inhalation of airborne contaminants and vapours and the accumulation of ground gases. The risk to buried structures from aggressive ground conditions and risk from ground settlement to the scheme where constructed over the landfill has also been considered. Due to the bombing of the airport during the Second World War, we have also assessed the risk of unexploded ordnance to be found at the site.

Preliminary findings from site investigations and generic and detailed risk assessments have indicated that the former landfill, and other areas of the scheme, do not pose a significant pollution risk to human health or the water environment, and that risks associated with existing ground conditions, including the potential for unexploded ordnance, can be appropriately managed.

### Measures for reducing potential effects

Our aim is to minimise potential risks to human health and the environment relating to existing ground conditions and we are continuing to develop measures to mitigate these risks in consultation with statutory authorities. The design and construction strategy for our scheme accounts for the potential risks associated with building on a former landfill site. For example, the location and orientation of the extended platform has been designed to reduce the amount of landfill excavation required. The design of the scheme also includes ground gas protection measures and an engineered cover system within the design to prevent gas egress and contact with materials and perched water/leachate in the former landfill.

We are continuing to engage with statutory authorities to agree a remediation strategy and monitoring programme for the excavation of material from the former landfill. We will also apply for an environmental permit for the reuse of materials from the landfill.



Geotechnical design measures/mitigation will be incorporated to address issues of ground settlement and aggressive ground conditions for areas of the scheme constructed over the landfill, such as:

- use of ground improvement techniques
- flexible pavement
- continuous monitoring for settlement and use of an appropriate concrete class

To account for the risk of unexploded ordnance at the site, contractors will be required to adopt control measures, such as additional surveys and watching briefs. Further information on construction environmental management and mitigation of existing ground contamination is provided in our Draft CoCP (refer to **Appendix 4.2 in Volume 3 of the PEIR**).

With appropriate mitigation in place, no significant risks associated with existing ground conditions have been identified. The remediation of the former landfill is expected to result in beneficial effects, as it will improve the overall environmental conditions at the site.

**Chapter 17 of the PEIR provides further detail on the assessment of likely effects associated with existing ground conditions.**

## Traffic and transport

### Aspects of our proposals that could cause effects

We have assessed how our proposals could impact on road traffic, both during construction and operation of the expanded airport.

Our preliminary assessment demonstrates that even without any expansion at the airport, traffic within the area surrounding the airport is forecast to increase in the future, which could lead to greater congestion, causing delays and a reduction in average journey speeds.

The proposed expansion is forecast to increase traffic by between 0.6% and 0.8% depending on the time of day, averaged across the area surrounding the airport. Forecast traffic increases are likely to be the highest in Luton (up to



3.4%) and North Hertfordshire (up to 2.2%). The majority of this additional traffic is likely to be focused on the A1081 between the airport and M1 Junction 10, and then on the M1 itself to the north and south of Luton. In addition to this, there are forecast to be traffic flow changes in south east Luton and on local routes to the south and east of the airport. This forecast increase in traffic with the expansion at the airport would reduce average speeds on nearby roads. Across the surrounding area, average speeds are forecast to reduce by around 1%, in comparison to a scenario with no airport expansion, with the largest forecast reduction in speeds of up to 5.7% within Luton. Outside of Luton, North Hertfordshire and St Albans are forecast to experience the largest average speed reductions of up to 0.5%.

We have also considered the effect on public transport. The rail service at Luton Airport Parkway station has improved recently with the introduction of the East Midlands Rail Connect service in addition to the Thameslink services. This service runs between Corby and St Pancras International stations with a 30-minute frequency and is operated by electric multiple unit trains. Furthermore, Luton DART is expected to open in 2022. It is expected that improved facilities for buses and coaches provided by the scheme, together with the increase in air passengers, will provide an incentive for public transport operators to offer further improved and expanded services.

### Measures for reducing potential effects

Our aim is for at least 45% of passenger journeys to the airport to be via public and sustainable transport, as an alternative to private vehicles, by a target date of 2039. The following key measures are included within our proposals to reduce extra traffic being created by the scheme:

- Extension of the Luton DART to serve the new terminal from the Luton Airport Parkway station.
- Proposed highway intervention works listed in section 4 of this brochure.
- Improvements to bus and coach services.
- Limited amount of new car parking for passengers and employees to reflect higher public transport take-up.

We will implement the following three key plans to adopt good practice for the management of traffic during construction and operation:

- Construction Traffic Management Plan (a draft version of this document is included within **Appendix 18.3 of Volume 3 of the PEIR**)
- Construction Workforce Travel Plan
- Framework Travel Plan (for airport operations) which will be closely integrated with the Green Controlled Growth strategy

With mitigation in place, changes in traffic flows during construction and operation are not likely to result in significant effects.

Further information on traffic flows generated by the scheme, and the potential effects on road users, is included in **Getting to and from the airport - our emerging transport strategy and Chapter 18 of the PEIR.**

## Waste and resources

### Aspects of our proposals that could cause effects

We have assessed how much waste our proposals for airport expansion would generate during construction, including any waste from demolition and excavation activities, and how much resource use, such as concrete, steel, and aggregates, would be required. In addition, we have estimated how much additional waste the increased number of passengers would generate and, where possible, how much further resource would be required to operate the expanded airport.

### Measures for reducing potential effects

Our aim is for the scheme to minimise the amount of waste produced during its construction and operation and maximise the amount of reused and recycled materials incorporated within the design.

As the site includes a former landfill, a section of which would need to be excavated during construction, we are proposing to sort and reuse as much of the material excavated from the former landfill, as possible. The lead contractor will also be required to procure and use recycled, locally-sourced and sustainable materials, where possible, and identify opportunities to minimise the amount of materials to be taken off-site. We will set targets for the diversion of waste from landfill during the construction of the scheme and monitor compliance against these. We will continue to identify opportunities for designing out waste and specifying reused and recycled materials within the design. Construction waste would be managed in line with a Site Waste Management Plan (a Draft Outline Site Waste Management Plan has been included within **Appendix 19.1 of Volume 3 of the PEIR**). Reuse of non-landfill material (i.e. soils and demolition waste) would be managed in line with a Materials Management

Plan, prepared by the contractor. With this mitigation in place, no likely significant effects related to waste management or resource availability due to the scheme have been identified.

**For further information on waste management and resource use, please refer to Chapter 19 of the PEIR and our Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR.**

## Water resources

### Aspects of our proposals that could cause effects

The scheme spans two river valleys, the River Lea, which is located approximately 450m to the south-west, and the River Mimram, approximately 3.5km to the east. The site is underlain by chalk bedrock, which provides a high level of groundwater storage. However, groundwater quality in the vicinity of Luton has been known to be poor due to pollution related to the surrounding area's industrial heritage. The majority of our chosen area for expansion is at low risk of flooding from rivers. However, areas of high flood risk from surface water flows have been identified across the site and off-site highway intervention work sites.

The existing airport manages surface water via a combination of discharge to public sewers and by soaking into the ground via a main soakaway. There are two Thames Water attenuation basins located on Eaton Green Road. Foul water is currently discharged to the public foul water network owned and operated by Thames Water. The public water supply assets are owned and operated by Affinity Water.

We have considered how the scheme could impact on the identified groundwater and surface water resources and the existing drainage network, as a result of changes to groundwater and surface water flow patterns, volume and quality. We have also assessed risks from the excavation and piling on former landfill which could expose and mobilise existing contamination and introduce new pollution pathways into the underlying groundwater.

### Measures for reducing potential effects

During construction, appropriate working practices will be implemented to minimise risks associated with contamination and flood risk in line with a construction surface water management strategy. A piling risk assessment and method statement will be developed to manage contamination risks associated with piling works in the former landfill. We are also continuing to engage with statutory stakeholders to discuss requirements for a landfill remediation strategy and a monitoring programme.

We are developing a drainage strategy to control water run-off and prevent pollution due to the operation of the expanded airport. Hydrocarbon separators, real time monitoring of pollution levels and treatment facilities will be embedded within the design to control the risk of pollution from the drainage of the scheme. The drainage strategy is being designed to allow for an increase in rainfall because of climate change, and to store surface water during storm events to reduce the risk of flooding downstream. To minimise the risk of groundwater pollution during operation, a capping layer would be installed across the exposed section of landfill which, in combination with the drainage system, will keep rainwater out of landfill layers.

With appropriate mitigation in place, effects on the water environment will not be significant. Furthermore, remediation of the former landfill, and the installation of pollution prevention measures, are expected to result in significant beneficial effects, by reducing the risk of existing contamination polluting groundwater and the River Mimram, which is groundwater fed.

**Further information on likely effects on water resources is provided in Chapter 20 of the PEIR.**



# 07 Land assembly and compensation

## Land assembly

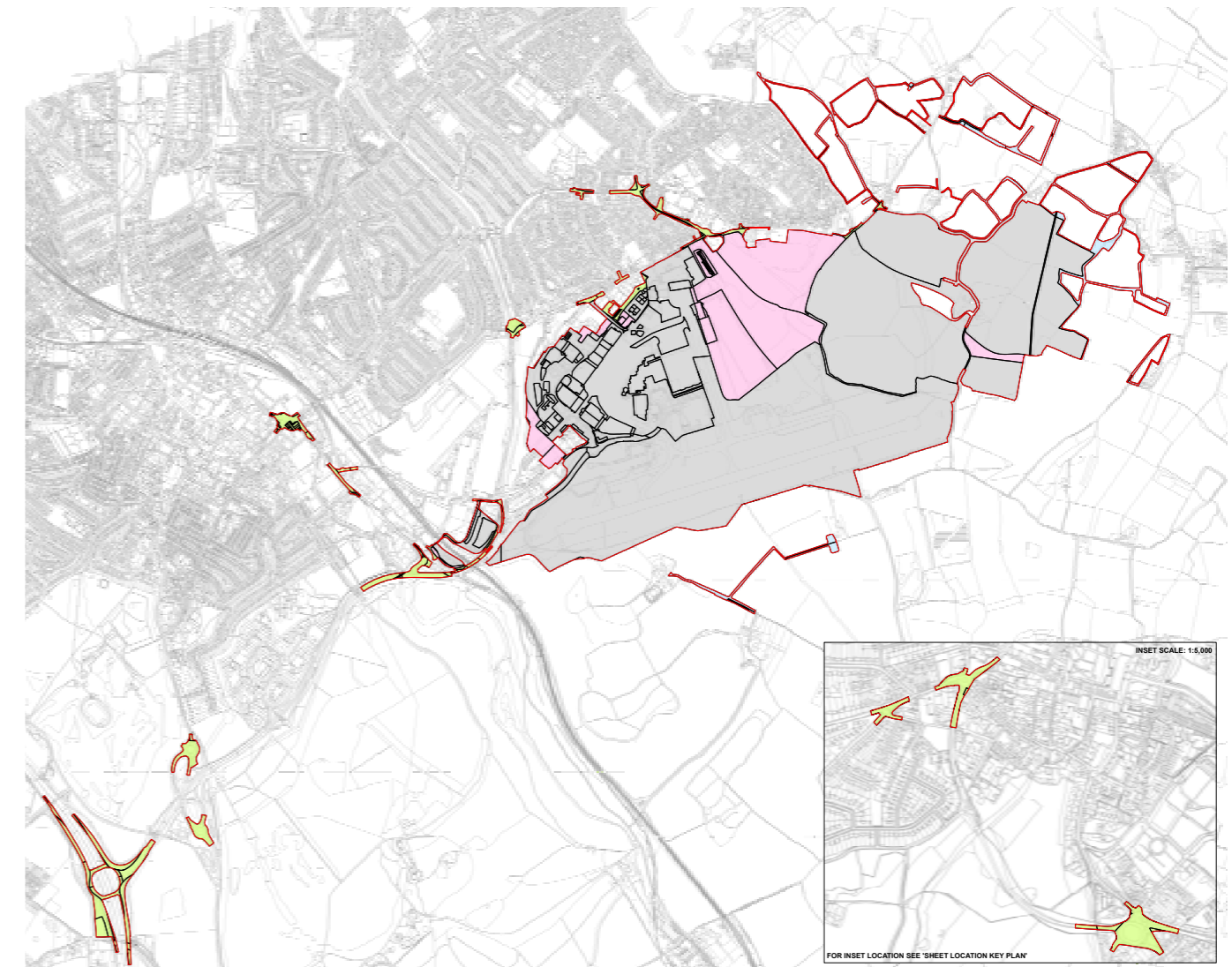
Along with our sole shareholder, Luton Borough Council, we already own or control most of the land that would be needed for our proposed expansion, including the land needed for the replacement open space in Wigmore Valley Park. However, we would still need to acquire some land and certain interests in land, including:

- Acquisition of freehold interests in land we do not currently own
- Acquisition of leasehold interests in land we already own
- Acquisition of some rights over land to establish and maintain certain mitigation measures (for example, hedgerow planting)
- Temporary possession of land to construct the scheme (for example, junction upgrades)

We are committed to ongoing discussions with landowners to acquire by private agreement any land or rights which may be required to carry out our expansion. However, where this is not possible, we would exercise compulsory acquisition powers sought as part of the DCO process. Given the phased approach to delivering our proposed expansion it is envisaged that land and property will be needed at different times.

We will only acquire land or rights compulsorily as a last resort.

Figure 7.1 Land assembly plan



### KEY

- |   |  |
|---|--|
| <span style="border: 1px solid red; display: inline-block; width: 15px; height: 10px;"></span> Proposed DCO application boundary  | <span style="background-color: #f080f0; display: inline-block; width: 15px; height: 10px;"></span> Land proposed to be permanently acquired          |
| <span style="background-color: #cccccc; display: inline-block; width: 15px; height: 10px;"></span> Land in London Luton Airport Limited freehold ownership – proposed powers of permanent and temporary acquisition of land/rights, to be exercised where necessary to facilitate the expansion | <span style="background-color: #add8e6; display: inline-block; width: 15px; height: 10px;"></span> Land proposed for permanent acquisition of rights |
|   | <span style="background-color: #90ee90; display: inline-block; width: 15px; height: 10px;"></span> Land proposed for temporary possession            |

Plan for indicative purposes only, please see our **Draft Land Assembly Plans** for more detail

## Compensation

The 'Compensation Code' is a collective term for the principles relating to compensation for compulsory acquisition, originating from Acts of Parliament and case law. Its general purpose is to provide fair compensation to land and property owners.

Some property owners and occupiers who are affected by our proposals but are not subject to compulsory acquisition may also be entitled to compensation. This includes those who can demonstrate that there is a reduction in the value of their property as a result of airport expansion, and those who feel that their

land has been impacted by construction. Claims for statutory compensation are subject to a number of conditions including who can make a claim and when a claim can be made. To find out more, please read our **Draft Compensation Policies and Measures** document.

### Statutory compensation

Landowners may be entitled to compensation as a result of the exercise by us of our compulsory acquisition powers. Compensation for any compulsory acquisition of land or rights would be paid in accordance with the Compensation Code.

You can find more detailed information in our **Draft Land Assembly Plans** document, and in **Getting to and from the airport - our emerging transport strategy** which contains plans showing the locations of potential traffic management measures on highway land.

Claims for statutory compensation are subject to a number of conditions including who can make a claim and when a claim can be made. To find out more, please read our **Draft Compensation Policies and Measures** document.

### Discretionary compensation

In addition to the statutory compensation mentioned above, we are offering the following discretionary compensation schemes to eligible local residents. Since our 2019 consultation we have improved our discretionary compensation offer and believe that this is now amongst the most generous offered by UK airports.

- **Voluntary acquisition of residential properties and relocation costs for those within the 69 dB noise contour**

On request, we would acquire eligible properties at their unaffected open-market value and will reimburse reasonable costs (for example, relocation costs).

- **Hardship scheme for properties in the 66 dB noise contour**

We are prepared to consider purchasing the homes of those unable to sell their property and who are experiencing exceptional hardship as a result at unaffected open-market value.

- **Noise insulation schemes**

We are offering a tiered noise insulation scheme that will replace any existing schemes. The scheme offers a range of packages for homeowners and owners of other special buildings, such as schools, dependent on the noise effects at their properties. This ranges from a full package of noise insulation to financial contributions towards noise insulation.

Further details of our discretionary compensation schemes, including details on eligibility, can be found in our **Draft Compensation Policies and Measures** document.

# 08 Future airport operations

## Future operations

It is not proposed to make any changes to the airport's operating hours or operating procedures. It is proposed to maintain existing controls and quota count limits on the number and type of aircraft that can operate in the night quota period between 11:30pm and 6:00am.

## Flightpaths

Changes to flightpaths and airspace cannot be made through an application for development consent, and must be made through the Civil Aviation Authority's Airspace Change Process (set out in CAP1616). Further details of this process are available at [REDACTED]. Accordingly, our proposed application will not seek consent for any changes to flightpaths or airspace. However, we recognise that the proposed increase in the number of flights from the airport means that flightpaths in and out of the airport will be of interest to nearby residents. **The information provided here is therefore for information only, and is not the subject of this consultation.**

The airport currently operates with flightpaths that have been in place for some time, except for one departure route which was changed in 2015 to make it compatible with modern navigation standards. Changes are also being made to the arrival routes to the airport, through an airspace change known as AD6, which will be implemented from 24th February 2022. Further details are available at the CAA's Airspace Change portal ([REDACTED]). Departure flightpaths from the airport are currently constrained by those of neighbouring airports, in particular Heathrow, Stansted and London City, which means that aircraft departing from London Luton Airport are currently limited as to their rate of climb. This results in greater noise to local communities than would otherwise be the case.

The current design of the UK's airspace is out of date, leading to congestion and delays, restricting the country's capacity to accommodate the growing demand for air travel and causing adverse implications for those on the ground in terms of noise and more generally to reducing emissions from air transport.

The government has reconfirmed its commitment to modernising how airspace is organised in the Jet Zero consultation, of July 2021 to ensure that greater efficiency is achieved in routing aircraft to help reduce carbon emissions from aircraft. The government is co-sponsoring the Airspace Modernisation programme with the Civil Aviation Authority and has provided some funding to help assist those organisations developing specific airspace change proposals. The overall objectives of the airspace modernisation programme were set out in the government's Aviation 2050 Green Paper of December 2018.

*"The overall objective for airspace modernisation is to deliver quicker, quieter and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace."*

*Department for Transport, Aviation 2050, December 2018, page 52*

Given the complex interactions between the airspace requirements of a wide range of users, including airports, responsibility for coordinating the delivery of airspace modernisation has been delegated to ACOG (Airspace Change Organising Group). ACOG is developing a Masterplan for Airspace Change over the South East of England (known as the FASI-S programme), which will set out the interactions between the differing requirements and how these can be resolved. A second draft of this Masterplan is due in the near future and will be assessed by the CAA. Until such time as this Masterplan is approved to proceed to the next stage, all further proposals for airspace change at specific airports have been placed on hold by the CAA.

The airport has already initiated its airspace change proposal as part of FASI-S. This proposal had reached the Option Development stage but cannot progress to the next stage until the next iteration of the overall airspace Masterplan is approved. Hence, the timescale for any specific changes that would be made to departure routes from the airport is not yet clear.

It is important to note that changes may be required to flightpaths from the airport to fit in with the overall airspace Masterplan regardless of whether the DCO is granted or not and that the DCO itself does not directly require changes to flightpaths over the ground to achieve the increase in runway movements.

Nonetheless, realising the modernisation of the airspace is necessary to enable the growth envisaged across the London airports to be achieved, including the growth envisaged through this scheme as well as at the other airports, including the potential third runway at Heathrow, due to the importance of removing the current complex interactions between flightpaths serving different airports. Given the priority being accorded to airspace change by the government, it is envisaged that the changes will be delivered in time to facilitate the growth plan for this scheme.

While the required changes to flightpaths are not yet known, National Air Traffic Services (NATS) had originally identified London Luton Airport as one of the airports which stands to gain most from a reduction in the population affected by aircraft noise if aircraft are able to climb more freely. In the NATS Feasibility Report into Airspace Modernisation in the south of the UK, published alongside Aviation 2050 in December 2018, NATS projected a potential 27.8% reduction in the size of the area affected by aircraft noise around the airport on a like-for-like basis.

Given the current progress with the broader airspace modernisation programme, the noise implications of our scheme have been assessed based on current flightpaths at this stage. However, there is a reasonable expectation that there will be changes, particularly to aircraft climb profiles over neighbouring settlements and potential for respite routes which will reduce the noise implications below those assessed over time. It is an important principle of the airspace change process that any changes to noise exposure on the ground are minimised.



# 09 Have your say



## Respond to the consultation

This consultation is an opportunity for you to share your views on our plans to expand the airport, which we will take into consideration as we refine our proposals, ahead of submitting our application for development consent.

There are several ways you can provide feedback and comments, all of which are free of charge:

- Online – complete and submit the online consultation response form by visiting our website [\[redacted\]](#)
- Email – email your consultation response form, and any other comments, to [2022consultation@lutonrising.org.uk](mailto:2022consultation@lutonrising.org.uk)
- Freepost – post (no stamp required) your completed consultation response form, and any other comments, to **FREEPOST FUTURE LUTON 2022**
- At consultation events – complete and submit a consultation response form at one of our face-to-face consultation events

Consultation response forms will be made available:

- At the document inspection venues listed on page 154
- At every face-to-face consultation event listed on page 153
- On request by emailing [futureluton@lutonrising.org.uk](mailto:futureluton@lutonrising.org.uk) or phoning **0800 538 5203** to leave a voicemail request
- Online via the website [\[redacted\]](#)

The deadline for responding to the consultation is **11:59pm on Monday 4 April 2022**.

Please note that while all feedback received by the deadline will be recorded and considered, we're not able to respond to individual comments.

Following the close of this consultation, we will produce a Consultation Report that will accompany our application for development consent. This report will detail the regard that was given to the responses received during consultation when developing our proposals.

## Consultation events

New for this consultation is our virtual consultation room, which can be accessed online at [\[redacted\]](#). This is available at any time of day or night throughout the consultation period (8 February to 4 April 2022).

Visitors can move around a virtual room to view consultation boards, download copies of consultation materials, submit questions and request a call back from a member of the team. This means that you can access the same information and experience as you would at a face-to-face event.

We are also holding 13 face-to-face consultation events at the following venues.

Table 9.1 Consultation events

| Date and time                               | Area                    | Venue address   |
|---|-------------------------|---|
| <b>Tuesday 15 February</b><br>15:00-20:00   | <b>Luton</b>            | <b>St Margaret of Scotland Church Hall</b><br>22a Bolingbroke Road, Luton LU1 5JD       |
| <b>Wednesday 16 February</b><br>15:00-20:00 | <b>Markyate</b>         | <b>Markyate Village Hall</b><br>Cavendish Road, Markyate AL3 8PS                        |
| <b>Friday 18 February</b><br>15:00-20:00    | <b>Stevenage</b>        | <b>Stevenage Arts and Leisure Centre</b><br>Lytton Way, Stevenage SG1 1LZ               |
| <b>Monday 21 February</b><br>15:00-20:00    | <b>Breachwood Green</b> | <b>Breachwood Green Village Hall</b><br>Chapel Road, Breachwood Green SG4 8NX           |
| <b>Wednesday 23 February</b><br>15:00-20:00 | <b>Leighton Buzzard</b> | <b>Leighton Town Football Club</b><br>Bell Close, Lake Street, Leighton Buzzard LU7 1RX |
| <b>Friday 25 February</b><br>15:00-20:00    | <b>Pitstone</b>         | <b>Pitstone Memorial Hall</b><br>Vicarage Road, Pitstone LU7 9EY                        |
| <b>Friday 4 March</b><br>15:00-20:00        | <b>Harpenden</b>        | <b>The Eric Morecambe Centre</b><br>Rothamsted Park, Harpenden AL5 2FR                  |
| <b>Saturday 5 March</b><br>10:30-15:00      | <b>Slip End</b>         | <b>Slip End Village Hall</b><br>Markyate Road, Slip End LU1 4JW                         |
| <b>Thursday 10 March</b><br>15:30-20:30     | <b>Hitchin</b>          | <b>Hitchin Town Hall</b><br>Brand Street, Hitchin SG5 1HX                               |
| <b>Wednesday 16 March</b><br>14:00-19:00    | <b>Tring</b>            | <b>Victoria Hall</b><br>Akeman Street, Tring HP23 6AA                                   |
| <b>Saturday 19 March</b><br>10:30-15:00     | <b>Whitwell</b>         | <b>Whitwell New Fellowship Hall</b><br>Bendish Lane, Whitwell SG4 8HT                   |
| <b>Monday 21 March</b><br>15:00-20:00       | <b>St Albans</b>        | <b>Jubilee Centre</b><br>Catherine Street, St Albans AL3 5BU                            |
| <b>Saturday 26 March</b><br>10:30-15:00     | <b>Luton</b>            | <b>Wigmore Church and Community Centre</b><br>Crawley Green Road, Luton LU2 9TE         |

We'll be following all relevant guidance regarding Covid-19 to ensure the safety of all attendees. Any changes to the planned face-to-face events, for example cancellations as a result of Covid-19 restrictions, will be published on our website and social media channels. Please check these before travelling to an event.

## Document inspection venues

In line with our digital first approach and commitment to sustainability, all consultation materials are available to download free of charge from the project website [\[redacted\]](#)

You can also request a free USB drive containing all the materials by emailing [futureluton@lutonrising.org.uk](mailto:futureluton@lutonrising.org.uk) or phoning **0800 538 5203** to leave a voicemail. Printed copies of all documents will be available to inspect at the following venues for anyone not able to access them online.

Table 9.2 Document inspection venues

| Document inspection venue  | Opening hours (correct at the time of publication)  |
|--|---|
| <b>Dunstable Library*</b><br>The Dunstable Centre,<br>Court Drive, Dunstable LU5 4JD<br>0300 300 8056                  | Mondays: closed; Tuesdays to Fridays: 9:00 – 18:00;<br>Saturdays: 9:00 – 16:00; Sundays: closed.  |
| <b>Harpenden Library*</b><br>27 High Street, Harpenden AL5 2RU<br>0300 123 4049  | Mondays: 9:00 – 18:00; Tuesdays & Fridays: 13:00 – 18:00;<br>Thursdays: 9:00 – 19:00; Saturdays: 9:00 – 17:00;<br>Wednesdays & Sundays: closed.   |
| <b>Hertfordshire County Council Offices</b><br>County Hall, Pegs Lane,<br>Hertford SG13 8DQ<br>0300 123 4040           | Mondays to Fridays: 8:30 – 17:30;<br>Saturdays & Sundays: closed.   |
| <b>Hitchin Library*</b><br>Paynes Park, Hitchin SG5 1EW<br>0300 123 4049   | Mondays: 13:00 – 18:00; Tuesdays: 10:00 – 19:00;<br>Thursdays & Fridays: 10:00 – 18:00; Saturdays 10:00 – 17:00;<br>Wednesdays & Sundays: closed. |
| <b>Leighton Buzzard Library*</b><br>Lake Street, Leighton Buzzard LU7 1RX<br>0300 300 8059                             | Tuesdays to Fridays: 9:00 – 18:00;<br>Saturdays: 9:00 – 16:00; Mondays & Sundays: closed.   |
| <b>Luton Central Library*</b><br>St George's Square, Luton LU1 2NG<br>01582 547 418                                    | Mondays: 9:00 – 19:00; Tuesdays to Fridays: 9:00 – 18:00;<br>Saturdays: 9:30 – 17:00; Sundays: 11:00 – 17:00.                                     |
| <b>North Hertfordshire District Council Offices</b><br>Gernon Road,<br>Letchworth Garden City SG6 3JF<br>01462 474 000 | <b>This office is currently closed but is expected to reopen soon, please check their website before attending.</b>                               |
| <b>Stevenage Central Library*</b><br>Southgate, Stevenage SG1 1HD<br>0300 123 4049                                     | Mondays: 10:00 – 19:00; Tuesdays to Fridays: 10:00 – 18:00;<br>Saturdays: 10:00 – 17:00; Sundays: 12:00 – 16:00.                                  |
| <b>Stopsley Library*</b><br>Hitchin Road, Luton LU2 7UG<br>01582 706 368   | Mondays, Tuesdays, Thursdays & Fridays: 9:00 – 17:00;<br>Wednesdays: 13:00 – 18:00; Saturdays 9:30 – 13:00;<br>Sundays: closed.                   |
| <b>Wendover Community Library*</b><br>High Street, Wendover HP22 6DU<br>01296 382 415                                  | Tuesdays: 9:30 – 18:30; Thursdays & Fridays: 9:30 – 17:00;<br>Saturdays: 9:30 – 16:00; Mondays, Wednesdays & Sundays: closed.                     |

The venues marked with an asterisk offer free internet and/or computer access to those who are unable to view documents online at home but wish to do so. Please note that some venues require a computer to be booked in advance by contacting the venue.

Those without computer access can request a printed copy of this Consultation Brochure and the Consultation Response Form free of charge. The full suite of printed consultation documents will be made available for purchase at the cost of £260 plus postage. All document requests are limited to one per household or organisation. Requests for alternative formats of the consultation documents will be considered on a case-by-case basis.

## How we will use the information you provide

The comments and views that are shared with us during this statutory consultation will be used in a number of ways:

- To gather and analyse feedback to help with the development of our plans
- To produce the Consultation Report as part of our application for development consent (no individual personal data will be published)
- To write to those that shared feedback with updates about the outcomes of this consultation and other developments (unless specified otherwise)
- To keep up-to-date records of our interactions with individuals and organisations

The information shared with us during the consultation may be used by the following recipients to record, analyse and report on the feedback received:

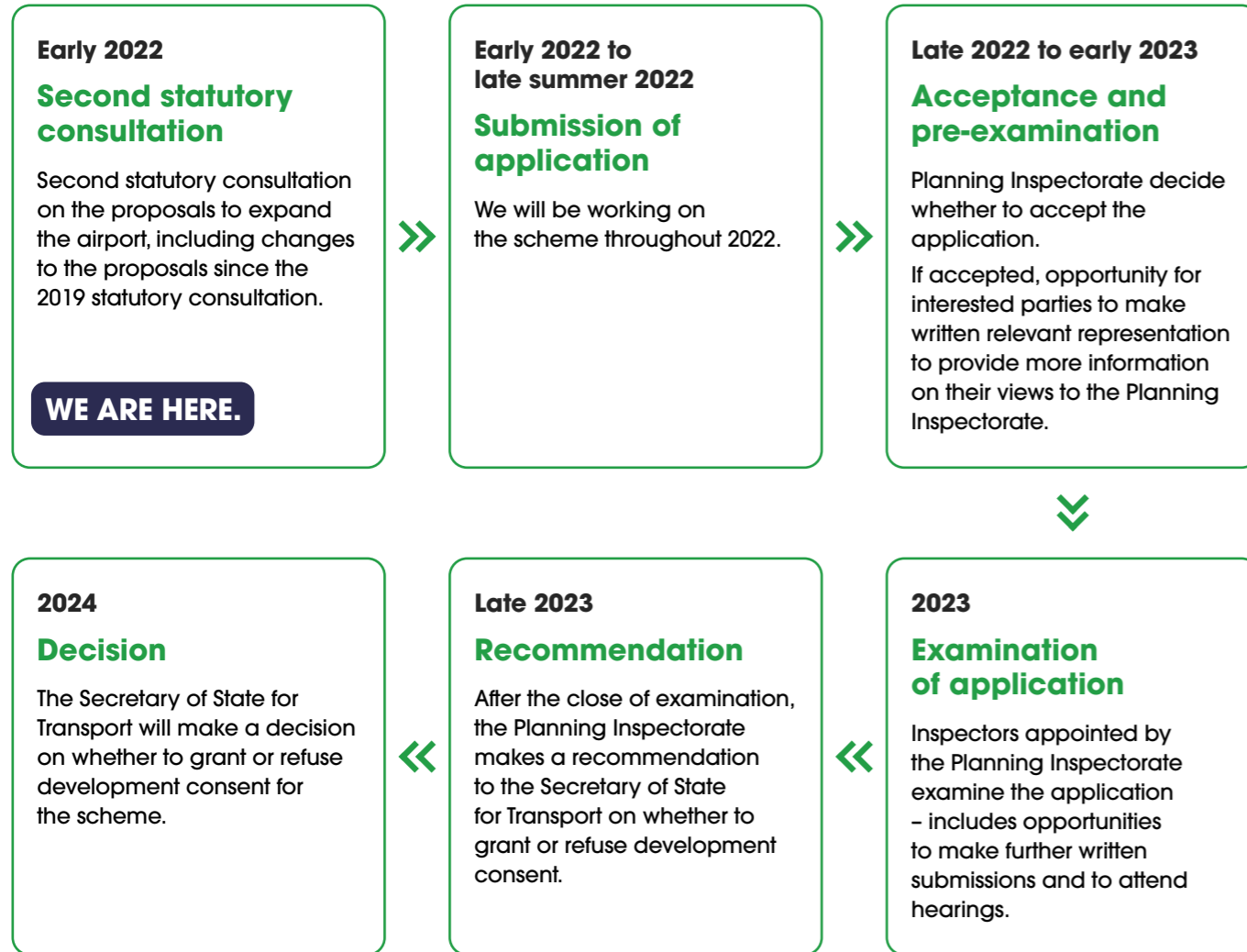
- Luton Rising (a trading name of London Luton Airport Limited)
- Project consultants
- The Planning Inspectorate
- Department for Transport

## GDPR and privacy

We are committed to protecting personal information. Any information provided will be used in line with relevant laws concerning the protection of personal data, including the General Data Protection Regulation (GDPR), which came into effect on 25 May 2018.

Under the terms of the GDPR, you have certain rights over how your personal data is retained and used by us. For more information, see our full data privacy statement at [\[redacted\]](#)

## Timeline



## Get in touch

You can sign up for future updates about the scheme on our website:



If you have any questions about the proposals or consultation, or if you would like to request printed copies of consultation materials or a USB drive, you can reach us in the following ways.

Email: [futureluton@lutonrising.org.uk](mailto:futureluton@lutonrising.org.uk)

Leave us a voicemail: **0800 538 5203**

Freepost (no stamp required): **FREEPOST FUTURE LUTON 2022**



# 10 Glossary

| Term   | Definition  |
|--|---|
| <b>Air Quality Management Area</b>               | Local councils in the UK monitor air quality in their areas and may designate certain places identified as having concerns with air quality as Air Quality Management Areas, with plans for improving the air quality. Luton has a number of these to help address the impacts of road traffic.   |
| <b>Aircraft apron</b>                            | The area of the airport where aircraft are parked, refuelled, loaded and unloaded, and boarded by passengers.   |
| <b>Aircraft stand</b>                            | The place where aircraft are parked.  |
| <b>Airfield platform</b>                         | Earthworks required to raise the existing ground levels to allow the proposed apron area and terminal piers to be constructed.  |
| <b>Airport Access Road (AAR)</b>                 | Formerly referred to as Century Park Access Road during our previous consultation, this will provide access to the east of the existing airport, in particular to the proposed Terminal 2, where the main airport expansion is proposed to take place.  |
| <b>Airport Carbon Accreditation scheme</b>       | This is the global carbon management programme for airports and independently assesses and recognises the efforts of airports to manage and reduce their carbon emissions.  |
| <b>Airports National Policy Statement (ANPS)</b> | The government's policy on the framework for expansion of airports. The 'policy' only has 'effect' in relation to the delivery of a Northwest Runway at Heathrow but also includes important and relevant considerations applicable to our proposed application for development consent.  |
| <b>Airside</b>                                   | The area of the airport that is within its passport and security checks.  |
| <b>Area of Outstanding Natural Beauty (AONB)</b> | Land which has been designated for protection and conservation due to its significant landscape value.  |
| <b>Autumn 2019 Statutory Consultation</b>        | The first statutory consultation on our proposals to expand the airport was held in the autumn of 2019. As a formal statutory consultation, it was subject to the requirements of the Planning Act 2008. 3,501 people responded to the consultation, including those who signed two petitions. A number of important points were raised and we carried out a review of the scheme in response to these points and made some key changes to our proposals. These changes are being consulted on as part of our second statutory consultation currently taking place. |
| <b>Aviation Policy Framework (APF)</b>           | This framework was published in March 2013 and contains relevant policy covering expansion at airports other than Heathrow. It sets out the strategy for supporting economic growth and other benefits through the aviation sector, and for managing the environmental impacts of aviation development in the UK.   |

| Term                                  | Definition   |
|---------------------------------------|--|
| <b>Bartlett Square</b>                | A proposed 2.5 acres of commercial development off Kimpton Road, next to Luton Airport Parkway station. The proposed commercial development will include 240,000 square feet of office space, 170-room hotel, complementary retail, and multi-storey car parking.  |
| <b>Biodiversity net gain</b>          | An approach which aims to leave the natural environment in a measurably better state than it was before.   |
| <b>BREEAM</b>                         | The world's longest established method of assessing, rating and certifying the sustainability of buildings.  |
| <b>Business aviation</b>              | The use of aircraft by companies and corporations to transport people or goods for business purposes.  |
| <b>Carbon footprint</b>               | The total amount of greenhouse gases which are emitted into the atmosphere by an individual, organisation, process, product or event, in this case the construction and operation of the airport.  |
| <b>Civil Aviation Authority (CAA)</b> | The statutory body in the UK that oversees and regulates all aspects of civil aviation.  |
| <b>Community First</b>                | In our last statutory consultation in 2019 we set out how we wanted to go further than simply mitigating the negative effects of expansion and proposed a new fund which we called FIRST. The aim of this fund was to share the benefits of airport growth by distributing funds amongst neighbouring local authorities for them to use for projects related to either: Community, Environment, or Access.<br><br>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'. |
| <b>Decibel (dB)</b>                   | A unit used to measure the intensity of sound. Audible sounds range from 0 dB to 140 dB.   |
| <b>Department for Transport (DfT)</b> | The government department responsible for the transport network in the UK, including airports and civil aviation. It will ultimately be the Secretary of State of this department who will make the decision on the application to expand the airport.   |

| Term   | Definition  |
|--|---|
| <b>Development Consent Order (DCO)</b>       | As we're planning to expand the airport's capacity by more than 10 mppa, the scheme is classed as a Nationally Significant Infrastructure Project (NSIP). This means we are required to apply to the government for permission to expand the airport, rather than the local planning authority. A Development Consent Order is the means of obtaining permission for developments categorised as an NSIP. |
| <b>Digital first</b>                         | We have taken a digital first approach to this consultation by reducing the volume of paper being used and reducing the number of face-to-face events we are holding, to decrease unnecessary travel. Our virtual consultation room allows you view the proposals and all the consultation materials, submit questions to the project team, and complete the consultation response form online.           |
| <b>Direct jobs</b>                           | Employment supported by organisations directly involved in the provision of air transport services on-site at the airport.  |
| <b>Document inspection venues (DIVs)</b>     | Hard copies of consultation documents will be available to view and read throughout the consultation period at multiple venues in the local areas around the airport. These can be visited at any time within their opening hours listed on page 154.   |
| <b>Earthworks</b>                            | Engineering works to move and excavate earth.   |
| <b>Eaton Green landfill</b>                  | A former landfill waste site which was operational between 1937 and 1978.   |
| <b>Engine Run-Up Bay</b>                     | An area of the airport allocated for aircraft to perform engine run-up checks.  |
| <b>Environmental Impact Assessment (EIA)</b> | The law requires large development projects to carry out an assessment of the likely significant effects they will have on the environment, allowing suitable mitigation measures to be proposed and informing those likely to be affected and decision-makers on the full impact.  |
| <b>Green Belt</b>                            | Areas around towns, cities and built-up areas, where the aim is to prevent urban expansion by keeping the land permanently undeveloped unless the proposed development is for 'exceptional circumstances'.  |
| <b>Green Controlled Growth (GCG)</b>         | GCG is our new, environmentally-focused approach to managing growth at the airport. It will introduce binding limits for the airport's noise, carbon, air quality and surface access impacts. The airport's growth and operation will be managed through these environmental limits, and growth will only be allowed where it can be shown to be delivered within these limits.                           |
| <b>Greenhouse gas</b>                        | Greenhouse gases are those, like carbon dioxide, methane, and nitrous oxide, which contribute to trapping heat in the Earth's atmosphere and cause global warming and climate change.   |

| Term   | Definition  |
|--|---|
| <b>Gross domestic product (GDP)</b>                    | The total value of goods produced and services provided in a country during one year.   |
| <b>Indirect jobs</b>                                   | Employment supported in the supply chain.   |
| <b>Induced jobs</b>                                    | Employment supported by the expenditure of the wages and salaries earned in the direct and indirect impacts.  |
| <b>Jet Zero</b>  | The government's proposed approach and principles to reach net zero aviation by 2050. This is due to be published in early 2022.  |
| <b>L<sub>Aeq, 16h</sub></b>                            | The average equivalent continuous sound pressure level over a 16-hour period, in this case taken to be 07:00 to 23:00, accounting for the daily average of aircraft movements during a 92-day summer period from 19 June to 15 September.   |
| <b>L<sub>Aeq, 8h</sub></b>                             | The average equivalent continuous sound pressure level over an 8-hour period, in this case taken to be 23:00 to 07:00 accounting for the daily average of aircraft movements during a 92-day summer period from 19 June to 15 September.  |
| <b>Landside</b>  | The area open to the general public without security checks, including the check-in and ticketing desks and terminal entrance. Once passengers have passed through security, they are in the airside part of the airport.   |
| <b>Local plan</b>                                      | A local plan sets out local planning policies and identifies how land is used, determining what will be built where. They are drawn up by local councils in consultation with the public.   |
| <b>London Luton Airport Enterprise Zone</b>            | Enterprise Zones are designated areas across England that provide government support to businesses who locate there as part of the government's wider industrial strategy to enable local economic growth. Luton Borough Council secured Enterprise Zone status for the area immediately to the east, north and west of the airport's existing terminal in 2015. Bartlett Square and New Century Park will be two major mixed-use developments within the London Luton Airport Enterprise Zone. |
| <b>London Luton Airport Operations Limited (LLAOL)</b> | The company that manages and operates the airport on a concessionary basis until 2032.  |
| <b>Lowest Observed Adverse Effect Level (LOAEL)</b>    | The level of noise exposure above which adverse effects on health and quality of life can be detected.  |

| Term  | Definition   |
|---|--|
| <b>Luton 2040 Vision</b>                                    | The Luton 2040 Vision has the primary priority of eradicating poverty locally, and aims to bring inclusive economic and employment growth to support improved life chances, prosperity, health and wellbeing for all residents.  |
| <b>Luton DART (Direct Air-Rail Transit)</b>                 | Luton DART will be a new fully automated transport system, approximately 2km in length, to move passengers between Luton Airport Parkway station and the airport. It will provide fast, frequent, and reliable transfers to the existing terminal and it is proposed to be extended to the new Terminal 2, making the airport more accessible by public transport. |
| <b>Luton Rising</b>   | The new trading name for London Luton Airport Limited, the owners of London Luton Airport. This new name is intended to reflect that we are not just an airport, but part of, and builders of, a community.  |
| <b>Million passengers per annum (mppa)</b>                  | The number of single-trip air passengers passing through the airport each year.  |
| <b>National Air Traffic Service (NATS)</b>                  | The main air traffic control provider in the UK. Air traffic controllers working for NATS provide en-route flight information and air traffic services to 13 UK airports, including London Luton Airport.  |
| <b>National Planning Policy Framework (NPPF)</b>            | This is the document that sets out the government's planning policies for England and how they are expected to be applied by local councils when they write local planning policies and decide planning applications.  |
| <b>Nationally Significant Infrastructure Project (NSIP)</b> | Nationally Significant Infrastructure Projects, or NSIPs, are large-scale developments relating to energy, transport, water or waste and are defined by the Planning Act 2008. NSIPs are granted development consent by the relevant Secretary of State rather than through the planning process administered by local planning authorities.                       |
| <b>Net zero</b>   | The balance between the amount of greenhouse gas produced by human activity and the amount removed from the atmosphere. Net zero is reached when the amount removed is equal to or more than the amount added to the atmosphere.   |
| <b>New Century Park</b>                                     | Planning permission was granted for New Century Park in 2021. It sits to the north east of the airport, and is proposed to include hotels, office space, industrial and manufacturing space, and improved facilities in the northern section of Wigmore Valley Park.   |
| <b>Noise Envelope</b>                                       | A framework of legally binding and enforceable limits and controls to manage air noise.  |

| Term   | Definition  |
|--|---|
| <b>Oxford-Cambridge Arc</b>                                | A globally significant area between Oxford, Milton Keynes and Cambridge. It is formed of five ceremonial counties: Oxfordshire, Bedfordshire, Buckinghamshire, Northamptonshire and Cambridgeshire. The Arc supports over two million jobs, adds over £110 billion to the economy every year and houses one of the fastest growing economies in England.  |
| <b>Planning Inspectorate (PINS)</b>                        | The Planning Inspectorate is an executive agency of government, which examines and makes recommendations to government ministers making decisions on Nationally Significant Infrastructure Projects.  |
| <b>Preliminary Environmental Information Report (PEIR)</b> | The purpose of the PEIR is to provide preliminary information on the likely significant environmental effects of the development to allow people to make an informed response to our consultation.  |
| <b>Project Curium</b>                                      | Planning permission was granted in 2014 for works to be carried out to increase the airport's capacity from 12 mppa to 18 mppa. This is known as Project Curium and London Luton Airport Operations Limited is responsible for this project. It includes improvements to passenger facilities in the terminal and aircraft stands, improvements to car parking in the central terminal area and works to aircraft taxiways. |
| <b>Public rights of way</b>                                | Refers to paths on which the public have a legally protected right of way, including footpaths and bridleways.  |
| <b>Rainwater harvesting</b>                                | A more sustainable water use practice, this involves the collection and storage of rainwater for later use, rather than allowing it to run off.   |
| <b>Real living wage</b>                                    | A voluntary hourly rate of pay set independently and updated annually by the Living Wage Foundation, which is intended to ensure all staff earn a wage that meets the real cost of living and covers everyday needs.  |
| <b>Romano-British</b>                                      | This refers to the period of time, and the culture that emerged, when Britain was under the rule of the Roman Empire.   |
| <b>Significant Observed Adverse Effect Level (SOAEL)</b>   | The level of noise exposure above which significant adverse effects on health and quality of life occur.  |
| <b>Statement of Community Consultation (SoCC)</b>          | The SoCC is only required for statutory consultations and explains how we're consulting people who live in the area around the airport. We consulted with local authorities on a draft of the SoCC so that we could take their feedback on board before publishing it.  |
| <b>Statutory Consultation</b>                              | Before submitting an application for development consent, applicants have a statutory duty to carry out a consultation on their proposals. Applicants are required to demonstrate how they have had regard to all responses to their statutory consultations – so this will apply to both the Autumn 2019 consultation and the current consultation.  |

| Term                               | Definition  |
|------------------------------------|---|
| Summer 2018 Consultation           | This was our first, non-statutory consultation, and so not subject to the requirements of the Planning Act 2008. This consultation introduced people to the options for expansion and gathered initial feedback to inform the evolution of our plans and designs. It is not necessary for an applicant to demonstrate the regard had to responses to non-statutory consultation but we will still explain to PINS how comments received at this stage helped inform our scheme. |
| Surface access                     | This refers to all the journeys that passengers take to get to and from the airport other than by flying, be that by car, coach, public transport, bike or on foot.   |
| Surface Movement Radar             | Surface Movement Radar detects and tracks the movement of vehicles and aircraft on the surface of the airport.  |
| Sustainable aviation fuel (SAF)    | A 'clean' substitute for the conventional aviation fuels which are produced from fossil fuels. SAFs are produced using sustainable resources and can be blended with conventional aviation fuel to reduce the amount of fossil fuels used.  |
| Sustainable drainage system (SuDS) | Water drainage solutions that provide an alternative to the direct routing of water through pipes and sewers to nearby watercourses. They mimic natural drainage systems with the aim of reducing flooding, improving water quality, and enhancing biodiversity and the environment.  |
| Sustainable transport              | Any form of transport which has a low impact on the environment, such as walking, cycling, public transport and electric vehicles.  |
| Taxiing                            | When aircraft are moving along the ground, this is called taxiing or to taxi.   |
| Taxiway                            | The path for aircraft to move between the apron, where passengers board and exit the aircraft, and the runway where they take-off and land.   |
| Three Counties                     | The airport's neighbouring counties – Bedfordshire, Buckinghamshire and Hertfordshire.  |
| Virtual consultation room          | Our online virtual consultation room is open throughout the consultation period, and can be accessed at <a href="http://www.lutonrising.org.uk">www.lutonrising.org.uk</a> . This will give you the opportunity to read about our proposals, download copies of the consultation materials, submit questions to the team, and complete the consultation response form online.   |
| Visual screening                   | The proposals will use vegetation and plants to screen and reduce the visual impact of the expanded airport.  |



# Get in touch

If you have any questions about the scheme or the consultation or would like to request printed or digital copies of consultation documents, please get in touch with us using the details below:

Email: [futureluton@lutonrising.org.uk](mailto:futureluton@lutonrising.org.uk)

Leave us a voicemail: **0800 538 5203**

# Respond to the consultation

You can respond to the consultation in the following ways:

Respond online at: 

Email your response to: [2022consultation@lutonrising.org.uk](mailto:2022consultation@lutonrising.org.uk)

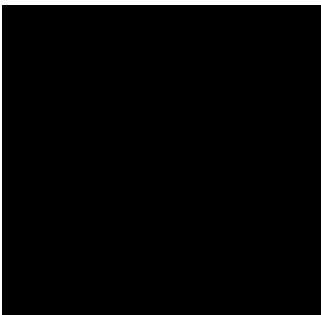
Post us your response (no stamp required) to: **FREEPOST FUTURE LUTON 2022**

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**Our airport.  
Our community.  
Our planet.**

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