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Your Ref: None  
Our Ref: LLALL/FutureLuton1/2019  
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Future Luton LLAL Consultation,  
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Dear Sir or Madam,

**Re: Dacorum Borough Council's response to the Future Luton Consultation, 'Making Best Use of Our Runway', October 2019**

I am writing on behalf of Dacorum Borough Council in response to the 'Future Luton' consultation, which began in October 2019.

Thank you first of all, for the opportunity to comment upon your final proposals as part of the Development Consent Order (DCO) process before you submit your application to Government next year.

Our key comments in response to this stage of 'Future Luton' consultation are as follows:

**General:**

1. We are reassured by the fact that Government will be the decision-maker for LLAL's expansion proposals this time.
2. We acknowledge that the recent growth in passenger numbers has outstripped that previously envisaged by LLAL, hence the need to consider expansion, however we remain concerned that expansion is being considered whilst current noise issues are still unresolved.
3. We acknowledge that the emerging proposals for growth of the airport put forward by LLAL, are being developed in line with Government aviation policy.
4. We note and support the principle of focussing on providing the necessary airport development to enable growth to the north of the runway, largely within current 'envelope' of the airport. We have no objection per se, to the relocation of Wigmore Park into North Hertfordshire.
5. As a matter of practicality, we support the logic of developing a second terminal, to enable passenger growth, allowing that growth to be phased and delivered in a way which minimises disruption to existing airport operations during construction.
6. We are mindful of what the impacts of the emerging expansion proposals could be for Dacorum Borough. We note that some further assessments may be required as the application progresses and we would strongly welcome the opportunity to be involved in their continued development as they emerge.

**The Economy and Local Employment:**

1. We acknowledge the economic and employment benefits of having an international airport nearby. In addition to the direct and indirect jobs which derive from the airport's operation, the variety of airport-related jobs available is broad and we welcome a wide variety of highly skilled jobs such as engineering etc., which airport activity and business brings to the area.
2. We acknowledge and support the fact that further development at the airport is highly likely to generate additional local employment and business for the Borough and will continue to be an important factor in encouraging businesses with international trade links to locate to the area.
3. It is fundamentally important however, that LLAL provides greater detail of the specific local advantages of the airport beyond Luton itself, when developing its detailed economic impact assessment to accompany the DCO proposals. This will aid local communities to better understand and balance the benefits and impacts of growth at the airport.

### **Noise Issues:**

1. We are pleased to note that LLAL's consultation documentation acknowledges that aircraft noise is one of the key issues it needs to deal with, if it is to obtain approval for expansion through the DCO process.
2. We ask LLAL to note that in Dacorum Borough, current flightpaths from the airport, have a significant impact upon the villages of Markyate and Flamstead in terms of aircraft noise. Eastern Hemel Hempstead and Tring are also significantly affected by noise. It is clear that doubling passenger throughput at the airport, essentially means a doubling of flights and a potentially significant increase in noise disturbance under flightpaths and holding areas, unless effective mitigation measures can be put in place, or significant investment in new and less noisy aircraft by the airlines operating from the airport. This remains a significant concern to Dacorum Borough Council and its residents and we would wish to see clear noise mitigation measures agreed in association with any permitted growth of the airport which are fully enforceable by an independent body.
3. We particularly support the consideration of noise mitigation measures, such as those indicated by LLAL, which would:
  - a. Maintain the current limit on night-time flights;
  - b. Provide firm requirements for airlines to adopt quieter aircraft;
  - c. Apply the principles of the International Civil Aviation Organisation's Balanced Approach to Aircraft Noise Management and;
  - d. Extend the coverage of the current Noise Insulation Scheme into the most affected parts of Dacorum Borough.
4. The modelling study predicts that the noise contours for day and night flights will place Dacorum residents within the Lowest Observed Adverse Affect Level (LOAEL) for both day and night. There is a reduction in the noise contours compared with the baseline, which the model has assumed arises from airlines upgrading aircraft over time. However the degree of fleet renewal is not described in transparent detail. When read alongside the noise management plan, 3.2.5 this notes that introducing new aircraft types can be fraught with delays. It would be useful for the modelling study to define the assumptions in fleet replacement, against current real world rate of replacement of aircraft, i.e. model uncertainty.
5. In defining criteria for observed effect levels, these are based on average levels for day (16 hour) and night (8 hour). The study does not consider max events (from overpass). Section 3.3.4 of the management plan acknowledges that average levels are not consistent with people's perception of aircraft noise as a number of discrete, noticeable events. At night in particular, maximum event levels are used to describe

likely potential for sleep interference but little justification for their inclusion in the study. When revising the LOAEL from aircraft the survey of noise attitudes has found that despite aircraft becoming quieter, annoyance has increased with lower average levels due to busier skies. Noting that passenger numbers are set to almost double it assumes twice as many flights overhead. Although this may equate to a 2-3 dB difference in exposure (2029 DN vs 2039 DS), this does not consider the full picture where there is distraction from twice as many aircraft passing overhead, i.e. discrete, noticeable events that distract and interfere. It is also not apparent through the PEIR that noise surveys were conducted with audio recordings that would help with the listener perception of the degree to which overpasses currently intrude, and how potential the period of respite between flights would halve.

6. Airports should devise their noise management plans (NMP) reflecting feedback from residents. The nature of complaints and how they impact is given limited discussion within the PEIR but could inform additional criteria for assessing significance. Furthermore, there is a disparity in that the NMP discusses night flights between 23:00 – 06:00, but modelling is based on a night period of 23:00 – 07:00. The NMP implies no increase in night flights, but modelling shows that under the 2039 DS scenario compared to 2029 DN, noise contours increase. This suggests an increase in night flights. This disparity may arise because of what is defined as night for modelling purposes (23:00 – 07:00) and night for the airport (23:00 – 06:00). These periods should align however for consistency and this apparent disparity should be addressed and explained.
7. If the hour between 06:00 – 07:00 is still considered night, and a period when people would reasonably expect to have undisturbed sleep, if there is a significant upturn in departures it appears that there may be a greater impact potential that is not being reported, especially based on maximum noise events. Guidance published by the Institute of Environmental Management (IEMA) present a similar analysis as opposed to a simple average over a long-term, which may result in impacts being more significant than presented.
8. Within the NMP there is concern with measures that can be implemented, rather than those which are to be investigated and for which there is limited evidence. There is a noticeable gap between 2022 – 2035 based on equivalency of aircraft. The NMP does not specify if objectives for fleet modernisation can be mandated or will be voluntary. This again goes basis of the modelling assumptions which have been made and which should be clarified so that we may properly assess the significance of impacts.

### **Transport and Travel:**

1. We note that LLAL's consultation documents suggest that at present, about 32% of passengers arrive or depart from the airport by public transport (rail or bus/coach), whilst the vast majority still journey to the airport by car (either private car or taxi). We therefore welcome LLAL's intention is to encourage further use of public transport and the investment it is making in the new Luton DART light rail service to help increase passenger journeys by public transport in future. However, we remain concerned that with the growth in passenger numbers envisaged, and despite that investment, there will still be a significant increase in traffic on roads in the locality, including those within Dacorum Borough. We therefore wish to ensure that the emerging Transport Plan to accompany the DCO proposals takes full account of the potential impact of airport expansion on our local road network and would wish to be involved in the continued development of that assessment, and/or any group which is formed to test the ability to maximise public and sustainable travel to the airport.
2. We would also ask LLAL to note our particular concerns in respect of the impact of further airport growth on traffic generation along the stretch of the M1 south of

junction 10/10a and request that both the Transport and Environmental Impact Assessment closely consider both the traffic and air quality implications of airport growth in that locality.

**Other Issues:**

1. In terms of airline safety, whilst acknowledging that Luton Airport currently has an excellent safety record, we would strongly urge LLAL to review the recommendations of all safety audits associated with airlines operating from the airport and airport operations as they arise, to help ensure that recommendations are acted upon swiftly and that any growth can be accommodated to the highest ongoing safety airline standards.
2. Finally, the Council notes that the extent of community benefits which derive to Luton Borough residents as a result of the airport are significant in both the commercial returns and Community Partnership Funding made available to the Luton community. This is to be welcomed in many respects, but the impacts of the airport are not confined to Luton Borough. Unfortunately, at present, only a very small part of LLAL's Community Funding Programme, about 0.35%, is made available through the 'Near Neighbour Fund', to provide grants to support community groups outside of Luton. This appears inequitable, particularly when some neighbouring communities are substantially affected by noise and environmental impacts of the airport. In this context, Dacorum Borough Council welcomes recently proposed improvements to the Community Funding Programme and would wish to see LLAL give further consideration to its development which better reflects the impacts of the airport on neighbouring communities, rather than just Luton.

I thank you once again for the opportunity to provide input into LLAL's emerging growth proposals and hope my Council's views are helpful to you as you work towards the DCO process. We would be pleased to be closely involved in any working groups and the continued development of further detailed assessments as they emerge

If you require any further clarity, please do not hesitate to call James Doe, my Assistant Director for Planning, Development and Regeneration.

Thank you for your consideration.

Yours sincerely,

A handwritten signature in brown ink that reads "James Doe". The signature is written in a cursive style with a small flourish at the end.

James Doe, on behalf of **Cllr Graham Sutton, Portfolio Holder for Planning and Infrastructure**