

NORTH HERTFORDSHIRE DISTRICT COUNCIL

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23 December 2019

London Luton Airport Ltd

Our Ref: LtnApt/Stat Consultation
Oct-Dec2019

By Email:
Futureluton@llal.org.uk

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Dear Sir,

Future LuToN Making best use of our runway London Luton Airport Limited

Public consultation – 16 October to 16 December 2019

Thank you for the opportunity to comment during the extended consultation period until 24th December for your expansion proposals.

This North Hertfordshire response is separate and in addition to the collective response of the four host authorities of Central Bedfordshire, Luton, North Hertfordshire and Hertfordshire County councils.

Whilst we acknowledge that there may be some economic benefits that would come with the growth of London Luton Airport any benefits do need to be balanced against the environmental impact any expansion would have on the neighbouring district areas.

Climate Change:

In May 2019, North Hertfordshire District Council declared a Climate Emergency. The Emergency noted the findings of the Intergovernmental Panel on Climate Change (IPCC) of October 2018.

The summary of the IPCC's report painted a sobering picture of the potentially adverse impacts of allowing global mean surface temperature to rise by 2⁰C compared with pre-industrial levels. Such impacts include; - more extreme weather, sea level rises and ocean acidification, with detrimental effects on wildlife, crops, water availability and human health.

North Hertfordshire District Council, Council Offices, Gernon Road, Letchworth Garden City, Hertfordshire, SG6 3JF

David Scholes
Chief Executive

www.north-herts.gov.uk



In line with this report, the Committee on Climate Change (CCC) has recommended a new emissions target for the UK, which is net-zero greenhouse emissions by 2050. This also includes the reductions in emissions from aviation, the CCC's present planning assumption is that UK aviation emissions in 2050 should be around their 2005 level. Key to reducing emissions in UK aviation will be the steps taken to limit growth in demand as the CCC stated: *in the absence of a true-zero-carbon plane, demand cannot continue to grow unfettered over the long-term*. In September 2019 the CCC wrote to the Secretary of State for Transport advising that key to achieving net-zero emissions by 2050 was to limit demand growth to at most 25% above current levels, with potential to reduce emissions further with lower levels of demand.

The Department of Transport has stated that the implications of Parliaments (May 2019) declared environment and climate emergency and the CCC's recommended policy approach to aviation will be taken into account in further developing its aviation policy through the Aviation 2050 process. Given the current DCO timeframe, new aviation policy should be in place with demand limits before a decision on this DCO is made. Therefore, NHDC is strongly of the view that LLAL should wait and fully consider the implications of the governments new Aviation Policy before progressing further.

Consultation Evidence Base:

As can be seen for the joint response by the host authorities the current evidence base for the consultation is deficient in some areas and clearly further engagement and monitoring is required in areas such as noise (including the potential for a ban on night flights and reasons why this is not being considered), surface access (the impacts on the network for all modes, and the potential mitigations required, are currently not satisfactorily evidenced, see further point below), air quality (to include the impact of road and air traffic), employment and skills strategy (all of which require more detailed assessments), and bringing forward a comprehensive monitoring, mitigation and compensation strategy which are of key importance to North Hertfordshire as well as the purpose and management of the relocated park.

We wish to be very clear that the park should have no detrimental impact upon our residents through loss of agricultural land. Nor should the park have any impact at any time on the Council budget, for example through on-going maintenance and operating costs, and congestion on our rural roads resulting from visitors. Therefore we expect that LLAL or any subsidiary will be fully responsible for all the costs now, and in the future with regard all aspects relating to the park. We would also wish LLAL to be clear on the purpose and benefits of the park rather than just stating it is a relocation project to enable

the airport and Century Park to expand. We would expect the assessment of reasonable alternatives to at least test a scenario of the development without the expansion of the park into North Hertfordshire in order to justify its relocation. We would also expect to see specific analysis as to how the scheme in terms of its development/design/mitigation will minimise the impact on Green Belt aims.

On the FIRST compensation scheme the Council would wish to see more detail on other compensation elements that could be included, such as dynamic landscaping payments to be agreed later with surrounding land owners, and air quality mitigation (which can include financial payments for monitoring, planting and even traffic restrictions for major projects). NHDC would want to be signatories to any S106 and have oversight over control of how the money is spent in our District. We would welcome further discussion with LLAL on this point.

In addition to the point raised regarding surface access the Council is particularly concerned at the lack of modelling regarding the potential impact of traffic on the rural roads through rat-running to the east of the airport within North Hertfordshire and the suggested road improvements in Hitchin along the A505 and A602. These suggested improvements are likely to increase and bring the traffic closer to residential properties and possibly lead to the decline in air quality standards. The works proposed are along one of the routes the traffic to the airport is likely to take and are in two Local Air Quality Management Areas, and could impact on health of the local community and the location of our air quality monitoring station. The Council is equally concerned regarding the traffic impacts along the A505 corridor as it passes through Letchworth linking the airport further eastwards and northwards towards Central Bedfordshire and South Cambridgeshire, and would expect to see the A505 corridor included in the modelling.

In terms of construction impacts, the Council would not wish to see construction traffic using the NHDC area and would expect noise and vibration to be minimised as much as possible as the nearest property is only 25 metres away.

Given these factors, North Hertfordshire is strongly of the view that there needs to be at the very least a further period of consultation once the evidence base is complete for everyone affected by the project before the formal application to the DCO is lodged.

Yours faithfully

Cllr Paul Clark
Executive Member for Planning & Transport