



Future LuToN

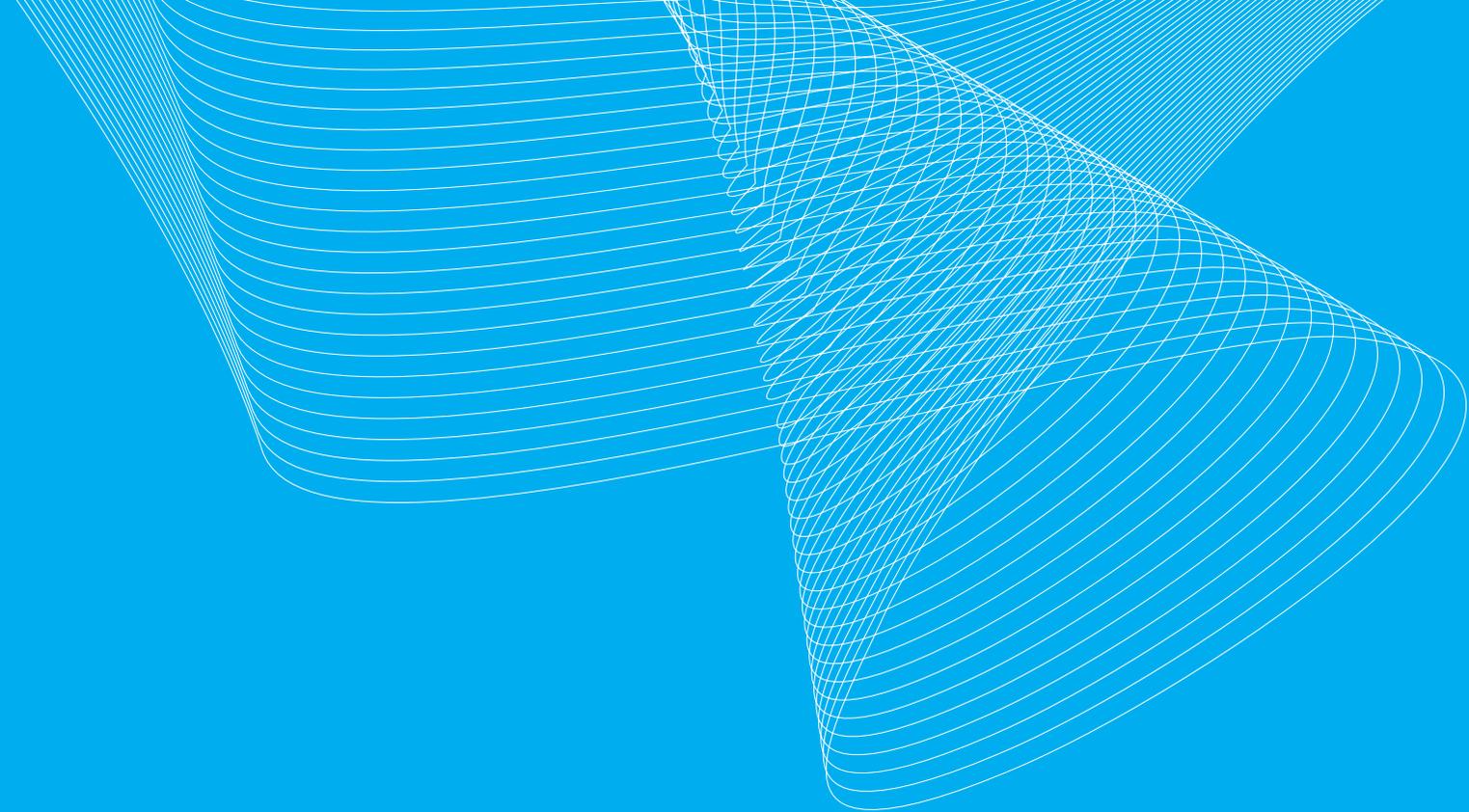
MAKING BEST USE OF OUR RUNWAY

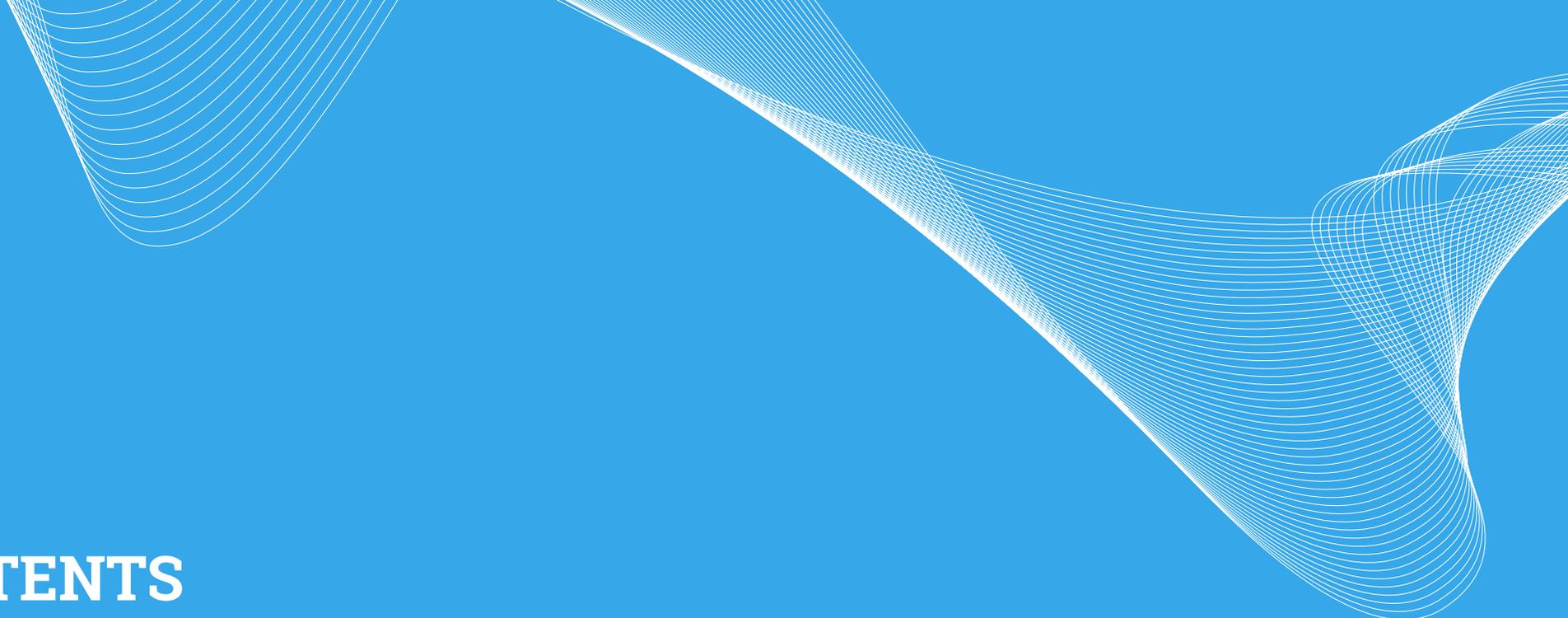
Non-Statutory Consultation Feedback Report

February 2019



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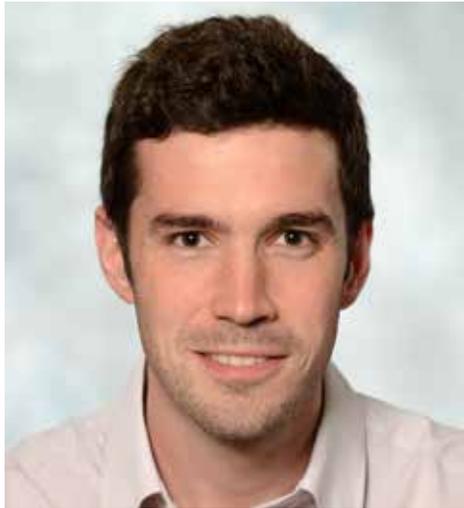
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FOREWORD FROM THE CHAIR OF LONDON LUTON AIRPORT LTD (LLAL)



Cllr Andy Malcolm
Chair of LLAL

This is our report on the ten-week consultation we held in summer 2018 about our options for making the best use of the existing runway for future sustainable growth of London Luton Airport (LTN). We said at that time that we would come back to you, and this report does that.

The report sets out who responded to our consultation, what the feedback was, and how we have considered the comments as we continue to work up a more detailed proposal. It also allows us to explain how we will move forward

in the light of the responses, with a preferred option which we will develop and further consult on in our statutory consultation, planned for later this year.

We are proud of the progress LTN has made to establish itself as the fastest-growing major UK airport over the last five years. At its present rate of growth, it is expected to reach its current permitted capacity of 18 million passengers per year during 2020. Meanwhile, demand for aviation across the UK continues to surpass previous expectations, with latest Department for Transport projections showing an unmet national demand of some 60 million passengers per year by 2050, even with proposed increases in capacity elsewhere in the London aviation system, such as a third runway at Heathrow. We at LLAL, Luton Council's airport company, see it as our responsibility to take LTN's success further, and deliver maximum benefit to the local and sub-regional economies, whilst seeking to minimise and mitigate the environmental impacts.

Already, LTN supports many thousands of jobs across Bedfordshire, Buckinghamshire and Hertfordshire, and over the last five years, we have provided more than £50m for charities, community and voluntary organisations in Luton and beyond in communities

impacted by airport operations. We believe that expanding LTN by building a new terminal and facilities and improving transport access has the potential to unlock a wealth of benefits and opportunities for local communities, across the sub-region, and nationally.

I was present at a number of last summer's community consultation events and the interest and passion demonstrated by those in attendance was clear. It was great to hear so many conversations about our proposals.

Our consultation outlined at a strategic level our approach and the airport's potential capacity to handle up to 36-38 million passengers per annum (mppa) using its existing single runway. We wanted to engage the public on the options before us as well as identify issues of importance to local communities. We also received valuable information to help us understand the potential environmental impacts and how these might be managed and mitigated.

We acknowledged at the outset of our consultation that a number of constraints, including airside constraints (the need for aircraft stands, taxiways and other infrastructure), landside constraints (the size and

number of terminals, access to the airport, noise, air quality and the impact on the built and natural environment) and airspace would have to be considered and assessed further during the development of our scheme. The feedback we received from the consultation was a key part of this process.

As a result of our assessments following consultation we have concluded that, at the present time, the most appropriate strategy for the Development Consent Order (DCO) is to seek permission to increase the airport capacity to a target of 32 mppa. We retain the long-term aspiration, as outlined in our December 2017 Vision, of making best use of our existing runway and reaching 36-38 mppa by 2050.

We are committed to our responsibilities to balance the potential benefits of expansion while actively managing the impacts, and we look forward to continuing this full and open conversation, listening to your views, and working with you to shape the future of London Luton Airport.





01

INTRODUCTION

THIS REPORT

We are London Luton Airport Limited (LLAL), the owners of London Luton Airport (LTN). Our company is in turn wholly owned by Luton Borough Council. LTN is operated by London Luton Airport Operations Limited (LLAOL) on a concession until 2031.

Our consultation

In summer 2018, we at LLAL held an early-stage, non-statutory consultation on our strategic proposals to expand LTN by making best use of the existing runway. The principal objective was to seek feedback from the public, businesses, public bodies and other organisations and interest groups, so that we could consider this feedback in our decision-making and in developing a better scheme for both the airport and its local communities.

As part of the consultation, we aimed to:

- Explain to the immediate and wider communities the benefits of expanding the airport using our existing runway;
- Seek views on the options that we have examined, explain our emerging preferences and why other options were not preferred, and outline the work that was still to be done;
- Seek early feedback and local knowledge that will allow us to further develop our proposals and strategies, such as the surface access, noise and air quality strategies;
- Supplement the ongoing technical engagement that is taking place with key stakeholders, such as the Environment Agency, airlines, Highways England, Natural England, Luton Borough Council and other local authorities;
- Test the scope of the work we have carried out to date, and explain what we will be doing in the future.

The feedback we received has helped us identify the best strategic option, which will be developed further into a proposed scheme that will be subject to further consultation. It also helped us to understand the most important issues for respondents, and we can now build these into our design and development process.

This report documents our response to the non-statutory consultation. It is structured as follows:

- **Chapter 1** introduces the consultation process, the options appraisal process which underpinned it, and the wider DCO process of which the non-statutory consultation forms part
- **Chapter 2** explains the background to consultation, including our vision for expansion and the assessment of options
- **Chapter 3** explains what we consulted on, how we consulted, and who responded

- **Chapter 4** reports on the consultation feedback we received
- **Chapter 5** sets out our response to the feedback, organised according to the key themes which emerged
- **Chapter 6** explains how we have revisited and updated our options appraisal work following consultation, taking into account the responses we received
- **Chapter 7** explains which option we will take forward into the next stage of the project

ASSESSING THE OPTIONS

Assessing the options – our “sifting” process

We have used a structured process to sift through the potential options for LTN’s expansion, which we have called the “Sift” process. We took this approach so that from a long list of potential options for the layout and configuration of the expanded airport, a preferred option could be identified.

Our team of leading technical advisers has helped us to understand the potential options for expanding LTN based on its particular constraints. The team has undertaken significant amounts of technical work, including studies on existing conditions, feasibility, and what new infrastructure the airport would need, to meet an increase in commercial passenger numbers with due consideration to requirements for general aviation and cargo operations.

The Sift process involved three stages. We have summarised the process below.

- At **Sift 1** we identified and assessed seven options for providing facilities to support the 240,000 annual aircraft movements required to handle up to 36-38 mppa. These options were then appraised against a set of high-level, qualitative criteria, chosen to meet key strategic objectives for the project. This process helped eliminate three options at an early stage.
- At **Sift 2** we took four options forward for further development. At this stage our short-listed options from the first stage of the sift process were developed further and considered in more detail by our technical specialists, including further appraisal against a set of sift criteria. It was the outcome of the Sift 1 and Sift 2 work that formed the core basis of the non-statutory consultation in summer 2018, to understand the views of the public and other stakeholders on our options appraisal and the emerging preferred option, before continuing with our options selection process. This is explained in further detail in chapter 2 of this report.

- **Sift 3** was the next stage of options appraisal work. We revisited our assessment of options, taking account of the feedback received during the consultation and our ongoing analysis of the options for expansion. Further detail on the outcome of Sift 3 can be read in chapter 6 of this report.

You can read further about the options sifting process in our reports: *London Luton Airport Expansion Project, Sift Reports 1, 2 and 3*.

The Development Consent Order process

The permitted capacity of LTN is currently 18 mppa. As our project is seeking consent for airport-related development that would expand the permitted capacity of LTN by over 10 mppa, it is a type of development, and of a scale, that meets the thresholds to be considered a Nationally Significant Infrastructure Project (NSIP) for the purposes of the Planning Act 2008.

As such, we must apply to the Secretary of State for Transport for a Development Consent Order (DCO) to authorise the proposed development. DCO applications are examined by the Planning Inspectorate, and decided by the Secretary of State for Transport (not Luton Borough Council).

Pre-application consultation is a key part of the DCO process, and the consultation we held was the first of two consultations we are planning.

The second consultation we will hold will be a detailed statutory consultation under the Planning Act 2008. This will be a consultation about the scheme we intend to apply for, having undertaken further work and having taken account of the responses we received during the summer 2018 consultation.

SUMMARY OF OUR PROGRESS

Summary of our progress

These two pages show a table that outlines the progress we have made to date, where we are now, and our future timetable in relation to the DCO process.

Date	Time
2018	Sift 1 - Initial identification of high level options
	At this stage, we identified and considered a long list of high-level options against a set of qualitative criteria, chosen to meet key strategic objectives for the scheme. This resulted in a short-list of options for further consideration.
2018	Sift 2 - Developing strategic options
	At this stage our short-listed options from the first stage of the sift process were developed further and considered in more detail by our technical specialists, including further appraisal.
2018	Summer 2018 consultation (non-statutory)
	Initial round of public consultation on the strategic options for making best use of the existing runway in the period up to 2050.
2018/2019	Consideration of consultation feedback, Sift 3 and development of proposals
	We have considered and reviewed all the feedback provided in the continued development of our options, and used this information for the purposes of Sift 3. From this, we have been able to identify a preferred option for LTN which will form the basis of the statutory DCO consultation. We have now completed this stage.
2019	Ongoing engagement and development of proposals
	Project team to continue dialogue with key stakeholders, to inform detailed development of the preferred scheme.

SUMMARY OF OUR PROGRESS

Date	Time
Autumn 2019	Statutory consultation
	We will consult again, on the option proposed to be taken forward to a DCO application, supported by the more detailed technical and environmental assessments.
Late 2019 / 2020	Further engagement, feedback review and finalising our proposals
	Consideration of all comments provided during consultation, leading to any final design changes to our scheme. Preparation of our DCO application, including an Environmental Statement.
Mid 2020	Submission of DCO application to the Planning Inspectorate
2020 / 2021	Examination of DCO application
	Following submission of the application, there is an opportunity to make representations about it to the Planning Inspectorate, who will handle the examination of the application. This includes an opportunity to make written submissions and attend hearings.
Mid 2021	Recommendation
	Following the closure of the examination, the Planning Inspectorate makes a recommendation to the Secretary of State for Transport.
Late 2021	Decision
	The decision will be taken by the Secretary of State for Transport.



An abstract graphic consisting of numerous thin, white, curved lines that sweep across the page from the bottom left towards the top right, creating a sense of motion and depth. The lines are densely packed in some areas and more sparse in others, creating a mesh-like effect.

02

BACKGROUND TO CONSULTATION
– OUR VISION & IDENTIFICATION
OF OPTIONS

OUR VISION & IDENTIFICATION OF OPTIONS

In December 2017, we published our 'Vision for Sustainable Growth 2020-2050' (the Vision). In line with government policy, the Vision outlines our intention to make best use of the existing runway at LTN to provide the maximum benefit to the local and sub-regional economy; to deliver good levels of service; and to actively manage environmental impacts at the local and wider levels in line with our wider commitment to responsible and sustainable development. The Vision document is available on our website at <https://www.llal.org.uk/vision2050.html>.

Our identification and assessment of options

To explore the options for making best use of the runway, we undertook a structured process we called 'sifting', so that from a long list of potential options for the layout and configuration of the expanded airport, a preferred option could emerge.

Prior to the non-statutory consultation we completed two stages of sifting – Sift 1 and Sift 2 – where options to make the best use of the runway were appraised against a set of criteria. This formed the basis of the consultation proposals. The sift process carried out in advance of

consultation is summarised below. For more information, please see our non-statutory consultation document published in June 2018, and the accompanying Sift 1 and Sift 2 reports, at <https://futureluton.llal.org.uk/>.

Sift 1

At Sift 1 we identified and assessed seven options for providing facilities to support the 240,000 annual aircraft movements required to handle up to 36-38 mppa. These options were then appraised against a set of high-level, qualitative criteria, chosen to meet key strategic objectives for the project. Below is a table outlining our assessment of the seven options under Sift 1.

The outcome of Sift 1 was that we identified four options known as 1a, 1b, 1c and 2 to be taken forward for further development into Sift 2. We discontinued options 3a, 3b and 3c, which were: building a second runway, realigning the runway and extending the runway, as they performed poorly on a number of grounds including government policy, environmental impact, financial viability and requiring a large amount of land not in LLAL's ownership.

Sift 2

At this stage our short-listed options from the first stage of the sift process were developed further and considered in more detail by our technical specialists.

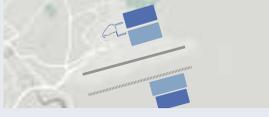
In seeking to develop these options, assumptions were made in respect of the likely buildings, infrastructure and potential mitigation (e.g. public open space) needed to support the airport when operating up to 36-38 mppa. We anticipated that the proposals would include the following facilities:

- Terminal facilities with boarding piers
- Additional aircraft stands
- Additional taxiways
- Vehicle forecourt and multi-storey car parking adjacent to the terminal
- Surface parking suitable for longer stays including replacement where the existing facilities are disturbed
- Bus station, taxi ranks and Luton Direct Air-Rail Transit (DART) station in the forecourt area
- Associated support buildings
- Road and infrastructure provision and adjustments

- Relocated engine run-up and fire training facilities
- Improvement to fuel storage facilities
- Improvement or replacement of existing and planned public open space and amenities

For Sift 2, illustrative design development was undertaken for each option. The illustrations and details of the four options are set out on the following pages.

SIFT 1

Ranking	Option	Key reasons for appraisal ranking	
<p style="text-align: center;">Most preferred</p> <div style="text-align: center;">  </div> <p style="text-align: center;">Least preferred</p>	Option 1a – two terminals to the north of the runway		<ul style="list-style-type: none"> • Generally performed well in terms of supporting emerging Government policy for aviation, increasing airside and landside capacity and in delivering economic and social benefits • Assessment against the other strategic criteria was more mixed with options 1a and 1c performing better overall at this first sift stage
	Option 1c – a single terminal to the north of the runway, located to the east of the site		
	Option 1b – a single terminal to the north of the runway, located to the west of the site		
	Option 2 – second terminal to the south of the runway		<ul style="list-style-type: none"> • Performed well in terms of supporting emerging Government policy for aviation, increasing airside and landside capacity and in delivering economic and social benefits • In other areas performed less well than options 1a, 1b and 1c, e.g. potential impact on the green belt and setting of existing heritage assets, namely Someries Castle and Luton Hoo
	Option 3b – extended runway		<ul style="list-style-type: none"> • Assessed as inconsistent with Government policy for aviation (which supports making best use of existing runways) and national planning policy e.g. green belt
	Option 3a – realigned runway		<ul style="list-style-type: none"> • Performed poorly on deliverability and financial viability as would require a large amount of land outside of LLAL ownership, and in the case of a second runway option would deliver capacity before demand exists
	Option 3c – second runway		<ul style="list-style-type: none"> • Potential impact on the setting of existing heritage assets, namely Someries Castle and Luton Hoo

OPTION 1A

Illustration of Option 1a

Here is an illustration showing what option 1a could look like: two terminals to the north of the runway, retaining the existing terminal and a new terminal on part of the existing Wigmore Valley Park, which could be reprovided further to the east.



OPTION 1B

Illustration of Option 1b

Here is an illustration showing what option 1b could look like: a single new terminal option to the north of the runway on the long-stay car park and part of Wigmore Valley Park, phased over time to incorporate or replace the existing terminal. This terminal could be located as far west as possible and expand eastwards as required. As with option 1a, Wigmore Valley Park could be reprovided further to the east.



OPTION 1C

Illustration of Option 1c

Here is an illustration showing what option 1c could look like: a single new large terminal option to the north of the runway on Wigmore Valley Park.

This terminal could expand westwards as required. As with options 1a and 1b, Wigmore Valley Park could be reprovided further to the east.



OPTION 2

Illustration of Option 2

Here is an illustration showing what option 2 could look like: a two-terminal option, retaining the existing terminal with a new terminal to the south of the runway. In this option, we expect Wigmore Valley Park could significantly remain where it is proposed to be located under the planning application for New Century Park.



SIFT 2: OUR ASSESSMENT OF THE OPTIONS

To appraise these options the criteria identified at Sift 1 were refined, and 28 sub-criteria were developed, as follows:

Strategic objective	Sift category	Sift criteria no.	Sift criteria
O1: Compliance with Government aviation policy	Strategy fit	S1	Consistent with making best use of the existing runway
O2: To identify a scheme that is likely to be capable of being consented and secured through a DCO		S2	In broad conformity with national and local town planning policies and capable of attracting the consents required
O3: To provide additional capacity and connectivity in line with the assessment of need		S3	Increase capacity both airside and landside to achieve target increase up to 36-38 mppa
O4: To maximise the potential economic benefits to the regional, sub-regional and local economies	Economic	S4	Deliver economic benefits nationally and regionally
		S5	Increase job opportunities for the people of Luton and the surrounding areas
O5: To maintain and where possible improve the quality of life for Luton's residents and the wider population	Social	S6	To promote quality of life and minimise adverse impacts on communities
O6: To minimise environmental impacts and, where practicable, to actively mitigate and manage any potential environmental effects	Sustainability and environment	S7	Noise
		S8	Air quality
		S9	Natural habitats and biodiversity
		S10	Carbon emissions
		S11	Water resources
		S12	Flood risk
		S13	Cultural heritage
		S14	Landscape and visual impact and environmental land use
S15	Climate change		

SIFT 2: OUR ASSESSMENT OF THE OPTIONS

Strategic objective	Sift category	Sift criteria no.	Sift criteria
O7: To maximise the number of passengers and workforce arriving at the airport on public transport	Surface access and highways	S16	Public transport modal share
O8: To minimise new-build highway requirements		S17	Requirement for additional highway infrastructure
O9: To minimise impact on the wider highway network		S18	Impact on wider highway network
O10: To be technically viable, taking account of the needs of airport users, operators and phasing	Deliverability	S19	Deliverable within the context of the current concession to 2031
		S20	Attractive to future concessionaires
		S21	Feasibility of landfill, earthworks and ground conditions
		S22	Additional land required beyond current LLAL land holdings
O11: To enhance LTN's system efficiency and resilience	Operational viability	S23	Operational effectiveness
		S24	System resilience
		S25	Attractiveness to airline operators
		S26	Safeguarding for expansion
		S27	Safeguarding existing levels of MRO, business, aviation and cargo activity
O12: To be affordable including any public expenditure that may be required and taking account of the needs of airport users and operators (value for money)	Cost and benefits	S28	Estimated cost benefit

Each option was then assessed against each of the criteria, taking into account their performance against the relevant sub-criteria.

Emerging preferred option

As part of Sift 2 we also identified which option was our emerging preferred option at that time, and why.

We explained that our emerging preferred option, subject to the results of the consultation and further design development, was option 1a. This was a two-terminal solution on the north side of the existing runway. In Sift 2 option 1a performed better against the majority of the sift criteria than the other options. We explained that a two-terminal configuration on the north side of the runway was, on the evidence available at the time, the most natural solution to future airport growth as it allows the development of new infrastructure to be phased and delivered in a way which minimises disruption to the operation of the airport during construction.

We noted that the way in which the development would integrate with the existing airport operation was particularly important in this context. The existing terminal and its associated stands are likely to continue to be utilised for at least 15 years before significant refurbishment, taking into account the recent redevelopment works to accommodate up to 18 mppa in the terminal at LTN.



03

THE CONSULTATION PROCESS

OUR CONSULTATION

Our summer 2018 consultation ran for ten weeks, beginning on Monday 25 June 2018 and ending on Friday 31 August 2018. Throughout this period, all consultation materials were available online as well as at local libraries and council offices. We invited members of the public, stakeholder groups, and local organisations to engage with the proposals, and submit their comments and answer questions on a feedback form. We organised 20 public consultation events across the region.

What we consulted on

Our consultation on making best use of the existing runway at London Luton Airport sought views on:

- the potential benefits of expanding the airport
- the options to expand the airport, including:
 - the strategy of making best use of the existing runway rather than pursuing an extended, realigned or second runway

- the options for making best use of the existing runway, including our proposal to focus development to the north of the runway and our emerging preference of a two terminal solution (option 1a)
- the key impacts of expansion and how they could be managed and mitigated, including in particular:
 - earthworks
 - public open space
 - noise
 - surface access
 - air quality
 - landscape and visual
 - heritage
 - biodiversity
- any other comments on the expansion proposals and our approach to consultation.

The consultation materials

The consultation materials comprised:

- Luton Airport Expansion Project Future LuToN: Consultation
- Luton Airport Expansion Project Consultation Summary
- Luton Airport Expansion Project Sift 1 Report (draft dated June 2018)
- Luton Airport Expansion Project Sift 2 Report (draft dated June 2018)
- Luton Airport Expansion Project Draft Sustainability Strategy
- Consultation Feedback Form

The materials can be viewed at <https://futureluton.lal.org.uk/>. A copy of the Feedback Form is included in this report at Appendix 1. It included a combination of questions that asked respondents whether they agreed or disagreed with our proposals, and questions that asked respondents to rank issues in order of importance. It also included text boxes to allow respondents to share in more detail their thoughts on the proposals.

Notifications

We implemented the following measures to promote and advertise our consultation and the event programme.

Posters

Large posters which detailed the events and the consultation were distributed to local authorities and organisations ahead of the consultation events. The posters offered the same detail as the advert and details about how to get involved.

During the first week of the event programme, in response to feedback from attendees, additional posters were placed in public spaces, including on parish council noticeboards in affected areas.

OUR CONSULTATION

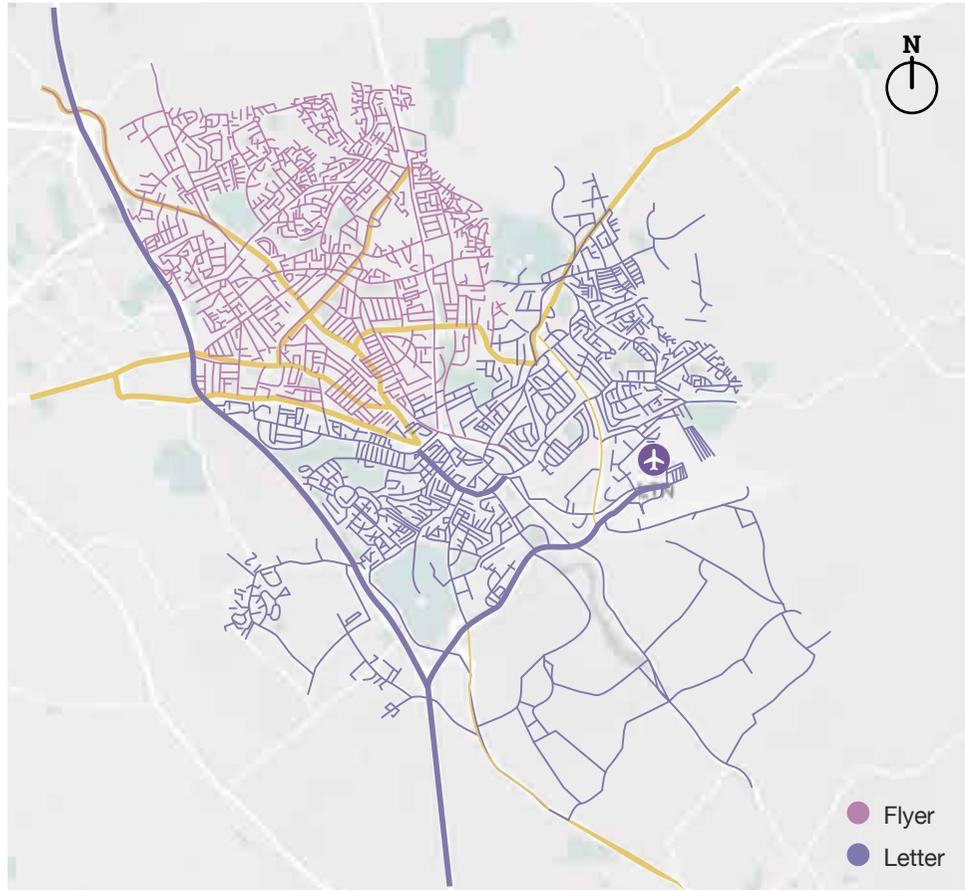


Image of scope that flyer and newsletter with details of consultation were sent to

Direct mail

We communicated the information about the consultation, event programme, and how to get involved to nearby residents in two ways.

A double-sided A5 flyer was hand-delivered to 39,029 addresses. This area of delivery is identified in the pink area in the map below. In addition, 39,783 letters were sent via Royal Mail to the addresses identified in blue on the map.

We also sent over 600 emails to stakeholders including local and regional community groups identified as having an interest in the airport and its development, such as environmental and community groups local to the airport.

Local media coverage

We placed adverts promoting the non-statutory consultation events in a number of local and regional newspapers, including on their websites where possible, during the 10-week consultation period. These newspapers were:

- Bedford Times and Citizen
- Bucks Free Press
- Bucks Herald
- Dunstable Today
- Hemel Hempstead Gazette
- Herts Advertiser
- Hitchin Comet
- Leighton Buzzard Observer
- Letchworth Comet
- Luton Herald and Post
- Luton News
- Milton Keynes Citizen
- Stevenage Comet
- St Albans and Harpenden Review
- Welwyn and Hatfield Times

The adverts detailed the timetable and location of events and contact details.

OUR CONSULTATION

Ad van

We also placed an advert on an ‘ad van.’ This ad van spent seven days during the first week of the consultation touring the locations listed below. The locations were based on areas where there had been high interest in previous consultations about development at the airport.

Date	Location
Wednesday 27th June	Luton
Thursday 28th June	St Albans / Hemel Hempstead
Friday 29th June	Leighton Buzzard
Saturday 30th June	Stevenage
Sunday 1st July	Dunstable
Monday 2nd July	Harpenden / Welwyn
Tuesday 3rd July	Luton

Document inspection venues

We placed consultation materials at a number of document inspection venues. These venues held copies of our documents over the consultation period so that members of the public could view them. These venues included libraries and council offices across the region, which are listed in the table below.

Venue	Address
Luton Borough Council	Luton Council, Town Hall, George Street, Luton LU1 2BQ
Central Bedfordshire Council	Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford SG17 5TQ
North Hertfordshire District Council	North Hertfordshire District Council, Council Offices, Gernon Road, Letchworth Garden City SG6 3JF
Hertfordshire County Council	Hertfordshire County Council, County Hall, Pegs Lane, Hertford SG13 8DQ
Luton Central Library	Luton Central Library, St George’s Square, Luton LU1 2NG
St Albans Library	St Albans Library, The Maltings, St Albans AL1 3JQ
Stevenage Library	Stevenage Library, Southgate, Stevenage SG1 1HD
Dunstable Library	Dunstable Library, Vernon Place, Dunstable LU5 4HA
Hitchin Library	Hitchin Library, Paynes Park, Hitchin SG5 1EW
Stopsley Library	Stopsley Library, 598 Hitchin Road, Luton LU2 7UN
Leagrave Library	Leagrave Library, Marsh Road, Luton LU3 2NL
Harpenden Library	Harpenden Library, 27 High Street, Harpenden AL5 2RU
Welwyn Library	Welwyn Library, Civic Centre, Prospect Place, Welwyn AL6 9ER
Hemel Hempstead Library	Hemel Hempstead Library, The Forum, Marlowes, Hemel Hempstead HP1 1DN

OUR CONSULTATION

Events

We initially organised 17 public consultation events over a four-week period, across the region.

Once we launched the consultation and advertised the four-week event programme, three extra consultation events were added to the programme, including an event specifically aimed at young people. Two of these events (in Pitstone and Tring) were organised in response to requests from district councillors to hold events in their areas following the publication of the consultation timetable.

These consultation events allowed members of the public to view and engage with the proposals, and meet and ask questions of the technical team.

The table opposite lists the events that were held over the four-week period (starting on Monday 9 July) within the ten-week consultation period, and the number of attendees.

Information on the project/proposals was displayed on consultation boards for the public to read and review. Consultation materials were available to take away in paper form, and were also available online.

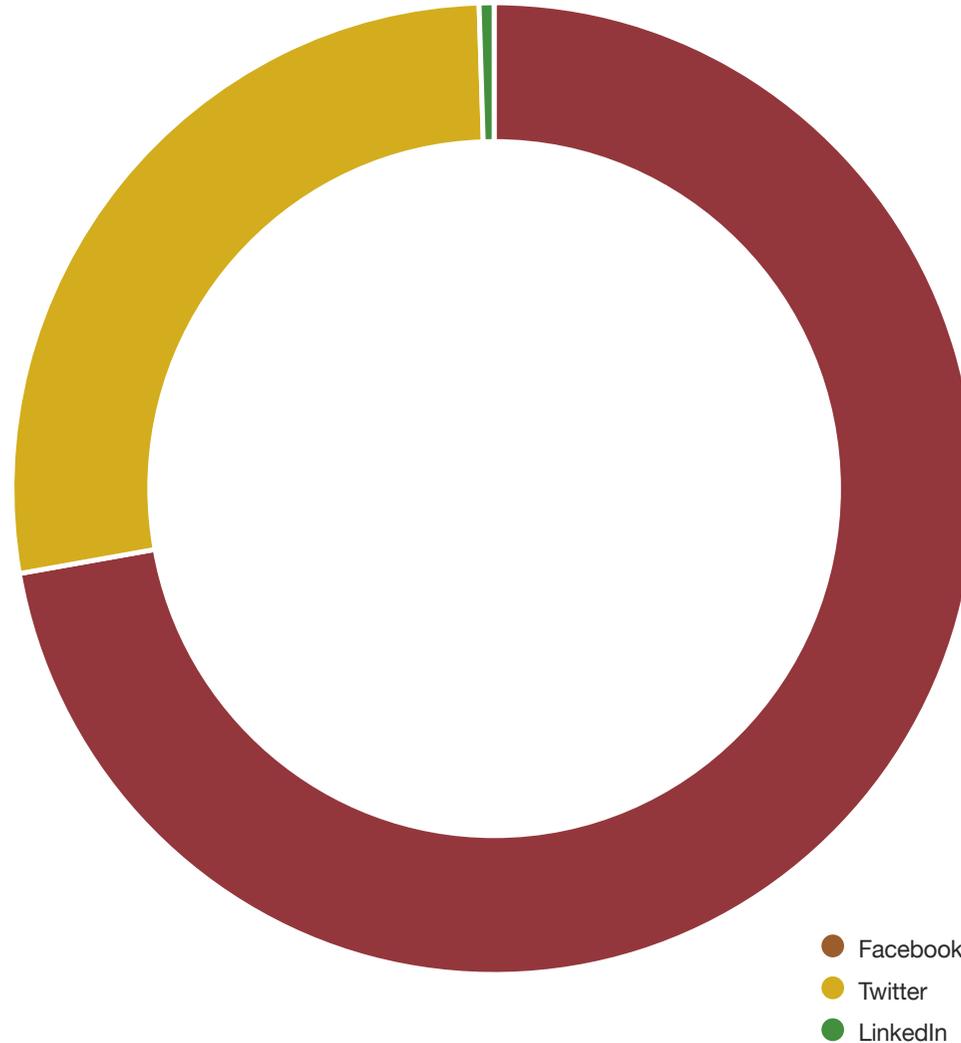
Number	Event	Date/time	No. of Attendees
1	University of Bedfordshire, Luton Campus, Vicarage St, Luton LU1 3JU	Monday 9 July, 1300-2000	103
2	Oaklands College, The Campus Welwyn Garden City, AL8 6AH	Tuesday 10 July, 1400-2000	31
3	Eaton Bray Village Hall, Church Lane, Eaton Bray Dunstable, Bedfordshire, LU6 2DJ	Wednesday 11 July, 1400-2000	25
4	Jubilee Centre, Catherine Street, St Albans Hertfordshire AL3 5BU	Friday 13 July, 1400-2000	111
5	Hitchin Town Hall, Brand Street, SG5 1HX	Monday 16 July, 1400-2000	78
6	The Old Town Hall, High St, Hemel Hempstead, HP1 3AE	Tuesday 17 July, 1400-2000	39
7	Southdown Room, Harpenden Public Halls, Southdown Road, AL5 1PD	Wednesday 18 July, 1400-2000	225
8	Raynham Community Centre, 66 Eaton Green Road, Luton LU2 9JE	Saturday 21 July, 1330-1600	171
9	Ellen Terry Room, 2nd Floor, Stevenage Arts and Leisure Centre, Lytton Way SG1 1LZ	Monday 23 July, 1400-2000	66
10	Mead Hall, East Ln, Wheathampstead, St Albans AL4 8BP	Wednesday 25 July, 1400-2000	84
11	The Incuba, 1 Brewers Hill Rd, Dunstable LU6 1AA	Thursday 26 July, 1400-2000	20
12	Breachwood Green Village Hall, Chapel Road, SG4 8NX	Friday 27 July, 1400-2000	92
13	Flamstead Village Hall, Church Road, AL3 8BN	Saturday 28 July, 1300-1630	57
14	Stockwood Discovery Centre, London Road, LU1 7HA	Monday 30 July, 1400-2000	241
15	Pitstone Memorial Hall, Vicarage Rd, Pitstone, Leighton Buzzard LU7 9EY	Tuesday 31 July, 1600-2000	58
16	Caddington Sports and Social Club LU1 4HH	Wednesday 1 August, 1400-2000	202
17	Whitwell New Fellowship Hall, Bendish Lane, SG4 8HT	Thursday 2 August, 1400-2000	52
18	Linslade Community Hall, Waterloo Road, Leighton Buzzard, LU7 2NR	Saturday 4 August, 1200-1600	11
19	Nora Grace Hall, Faversham Close, Tring HP23 5BA	Wednesday 8 August, 1600-2000	50
20	Young people's workshop facilitated through the National Citizen Service summer programme	Thursday 16 August, 1000-1230	45

OUR CONSULTATION

Website

A website was designed for the consultation. The website address is: www.futureluton.llal.org.uk. Members of the public and other interested parties were able to read or download all the project documentation, complete an electronic feedback form, and find out ways to engage with the consultation process. The website will continue to be used by the team to issue updates and for our future statutory consultation.

The website was well used and was promoted by the project team via social media, with Facebook being the most viewed method. The below shows the proportion of the unique page views based on social media channels.



Unique page views based on social media channel

OUR CONSULTATION







04

THE FEEDBACK

RESPONSES RECEIVED

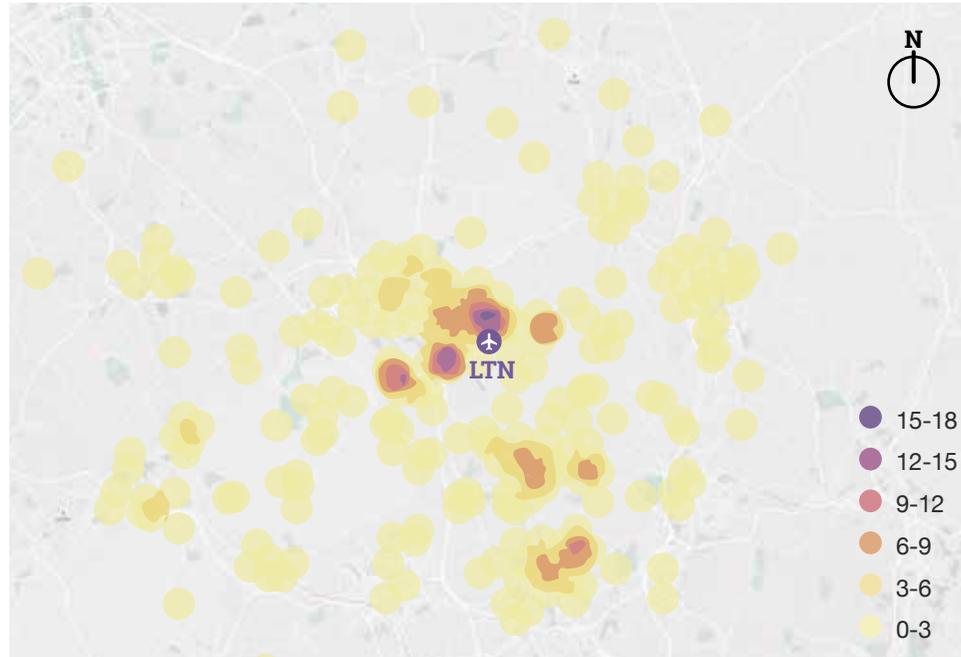
We received feedback from members of the public and other interested parties in a number of ways, including completed feedback forms, emails and letters. In total, we received 892 responses to the consultation:

- 340 paper feedback forms (completed at consultation events or sent back to the team via freepost)
- 499 online feedback forms
- 53 letters/emails

The majority of the feedback received was from individual members of the public. We also received feedback from a number of organisations, including town and parish councils, and campaign groups. These are listed at Appendix 2.

Location

The majority of respondents, both through feedback forms and by letters/emails, provided us with their addresses. As such, we were able to analyse and identify clusters of where respondents were from.



Heat map showing areas of where respondents were from

As outlined we received a range of feedback to the consultation from both online and written feedback forms and also from individual letters and emails. All consultation responses were considered carefully and analysed using a systematic process described below.

We grouped the responses we received into two data sets:

- The first data set consisted of the responses in the feedback forms. The feedback forms consisted of a mix of closed and open questions. The closed questions were subjected to statistical analysis to provide quantitative data about the nature of the responses received. The open questions allowed for “free text” responses, and for these a coding system was developed in order to identify the themes being raised. A code was attached to each issue raised in each individual response.
- The second data set was made up from the letters and emails received from the consultees. These respondents did not complete the feedback form, but provided separate written responses. Given the inherent difficulties and risks of trying to analyse and interpret these responses against the specific closed questions

ANALYSIS OF RESPONSES

in the feedback form, a separate coding system was developed to identify the themes being raised. Again, a code was attached to each issue raised in each individual response.

Both data sets were shared with the specialists in our technical team to ensure that regard was had to each comment that related to their specialism, and so that key themes could be identified and reported.

Reporting of responses

The remaining sections of this chapter set out the feedback received, structured according to the questions presented in the feedback form.

Where statistical data is presented, it should be noted that these are drawn from responses submitted on the feedback form. While analysing the feedback forms, we found that not all the closed questions on the feedback forms that asked respondents to rank impacts from most to least important were completed as asked. Our analysis of the four ranking questions shows three outcomes of the answers provided; these comprise where the respondent:

1 answered the question and ranked the priorities as asked; or

2 ranked some priorities but not all; or
3 did not rank the priorities as asked, for example, selected 'most important' for all priorities.

For the answers to the ranking questions, we calculated results separately for those completed as asked, and those completed in a different way, and both were considered when analysing the answers to the ranking questions. No answer has been ignored or discounted when carrying out the analysis.

On the free-text responses to consultation, unsurprisingly there was much commonality between the themes emerging from open questions in the feedback forms, and from the "unstructured" letter / email responses. Therefore the sections which outline the free-text comments received on a particular topic are drawn from both the feedback form response and the letter / email response datasets.

Whilst the reporting of responses necessarily takes the form of a summary of responses, reflecting the key themes emerging, it should be emphasised that all responses were read, reviewed and considered by the project team.

Questions 1-2 – respondent type and relationship to London Luton Airport

Question 1a of the feedback form was designed to help the team understand from the outset in what capacity the respondent was completing the form:

Are you responding...?

As an individual

On behalf of an organisation or group

In total, 826 respondents answered this question.

Of these, 791 answered 'as an individual' and 32 answered 'on behalf of an organisation or group.' Although two options were provided as potential answers that respondents could answer, three respondents selected that they were responding as an individual and on behalf of an organisation or group.

Question 1b asked respondents to expand on their chosen response to question 1a:

If you are responding on behalf of an organisation or group...? Which organisation/ group do you represent? In what capacity are you responding?

In total, 37 respondents answered question 1b. A full list of groups and organisations which responded to the consultation (which comprises both feedback form and letter / email respondents) is provided in Appendix 2.

Question 2

Question 2a asked respondents to tell us their relationship with the airport, and two options were provided:

Please tell us if you... (tick all that apply)

Work at London Luton Airport

Have used London Luton Airport in the last two years

In total, 519 respondents answered question 2a.

Of the 519 respondents, 515 in total answered 'Have used London Luton Airport in the last two years.' The remaining four were split: two respondents answered 'work at London Luton Airport' and two individuals selected both responses – they had used the airport in the last two years and also work at the airport.

QUESTION 2B

Question 2b asked respondents:

Please tell us if you are currently affected by the operations of London Luton Airport.

In total, 680 respondents answered this question. 45 respondents stated that they are not impacted by the operations at the airport, with 635 respondents outlining that they are impacted by the operations in some way.

Affected	635
Not affected	45

We analysed the free text answers to question 2b and have outlined in the table the top ten themes that appeared.

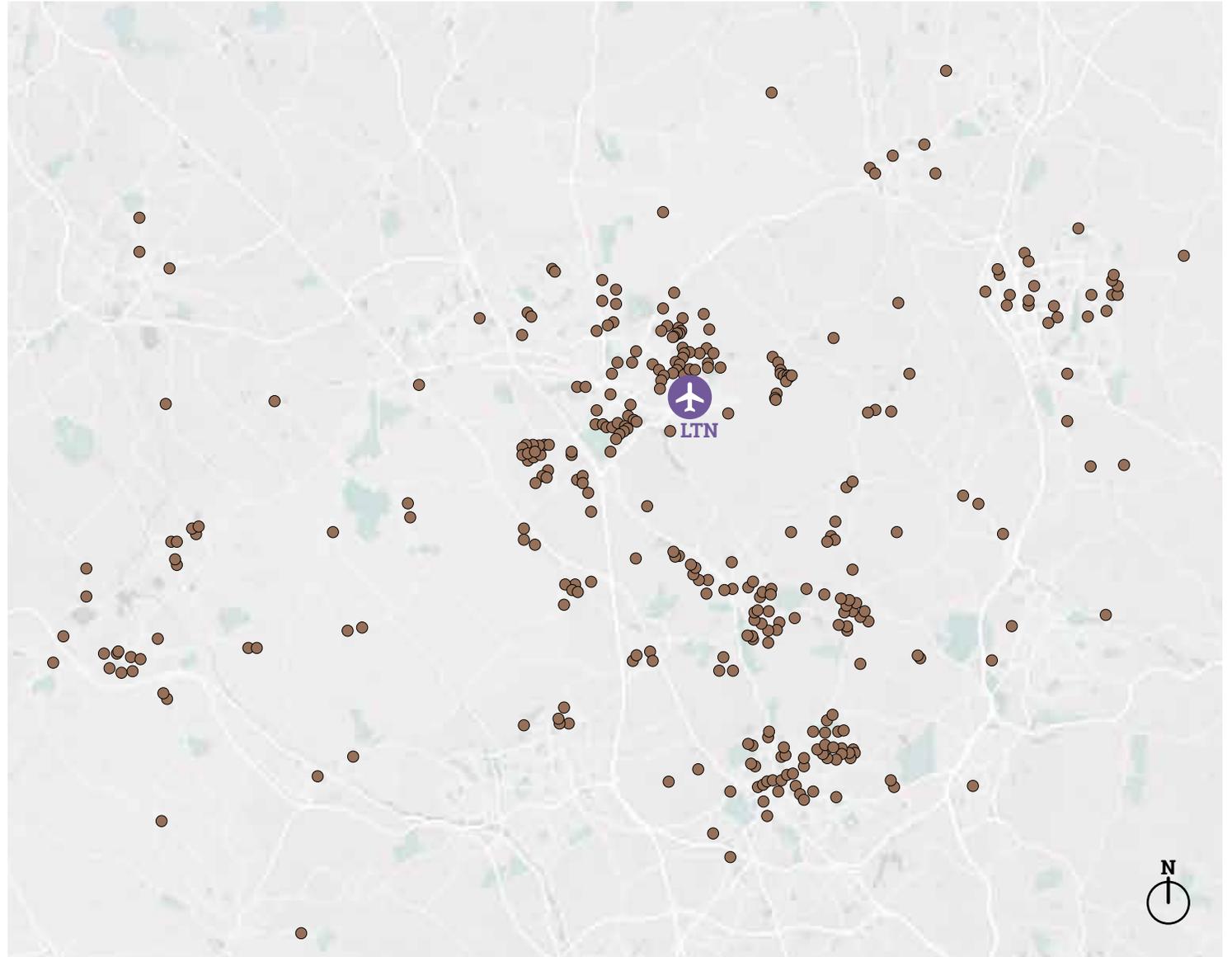
Theme	Theme expanded on	Percentage of those that answered the question
Noise	Concerns about existing flightpaths	72%
Congestion	Concerns about traffic congestion in local roads	14%
Noise	Concerns about night-flights	13%
Air quality	Concerns about pollution	12%
Parking	Noting issues about airport users parking in the wrong place (e.g. residential roads)	11%
Noise	Concerns about future flightpaths	2%
Congestion	Concerns about future congestion in local roads	2%
Congestion	Noting issues with existing traffic congestion around the airport	2%
Operations	Suggesting airport operating improvements	2%
Public transport	Rail (concerns with capacity and networks)	2%

Table showing top ten themes to question 2b

The main themes arising in relation to the ways respondents are currently affected by London Luton Airport, drawn from both the feedback forms and from responses by letter and email, can be seen in the table. In summary, the effects of the airport on respondents predominantly related to their proximity with the existing flightpaths (including noise impacts). Consultees also took the opportunity to raise concerns about the airport including issues relating to local parking provision and surface access impacts.

QUESTION 2B

This map shows the general locations of those who stated that they are impacted by noise to question 2b.



QUESTION 3A

The benefits of expansion

Question 3 of the feedback form focused on the benefits of the expansion proposals. Respondents were referred to chapter 3 of the consultation document, where we outlined the benefits that we believe will arise locally, regionally, and nationally as a result of our proposals to expand London Luton Airport.

Question 3a asked:

To allow us to understand your priorities with regard to the potential benefits of the expansion proposal, how important are the following to you? Please rank the following in order from 1 to 7, where 1 is the least important and 7 is the most important to you. Please tick one box per row and one box per column.

Ability to attract new jobs and economic growth into the area

Ability to support key local services through Luton Council

Ability to support important charitable and voluntary organisation services through the LLAL Community Fund in areas impacted by airport operations

Locally-convenient air travel to a greater range of destinations

Ability to support growth of the UK economy

Ability to contribute to meeting the increasing national demand for air travel

Ability to maintain competitive charges for airlines and customers

In summary, respondents considered that the ability to attract new jobs and economic growth into the local area was the most important priority, followed by the contribution to the growth of the UK economy as a whole. Locally-convenient air travel to a greater range of destinations was also seen as a priority. The ability to maintain competitive charges for airlines and customers and the ability to meet increasing national demand for air travel were considered by respondents to be the least important priority.

In total, 702 respondents answered this question. The below table captures the average order of preference, whether or not the question was answered as asked

Priority	Order of ranking (7 = most important, 1 = least important)
Ability to attract new jobs and economic growth into the area	7
Ability to support growth of the UK economy	6
Locally-convenient air travel to a greater range of destinations	5
Ability to maintain competitive charges for airlines and customers	4
Ability to support important charitable and voluntary organisation services through the LLAL Community Fund in areas impacted by airport operations	3
Ability to support key local services through Luton Council	2
Ability to contribute to meeting the increasing national demand for air travel	1

Of those who completed the feedback form as asked, the results were as follows

Priority	Order of ranking (7 = most important, 1 = least important)
Ability to attract new jobs and economic growth into the area	7
Locally-convenient air travel to a greater range of destinations	6
Ability to support growth of the UK economy	5
Ability to support important charitable and voluntary organisation services through the LLAL Community Fund in areas impacted by airport operations	4
Ability to support key local services through Luton Council	3
Ability to maintain competitive charges for airlines and customers	2
Ability to contribute to meeting the increasing national demand for air travel	1

QUESTION 3B

The second part of question 3 - question 3b - asked respondents:

Are there any other benefits you think we should be prioritising from the expansion of London Luton Airport?

In total, 494 feedback form respondents answered this question.

We analysed the free text answers to question 3b and have outlined in the table below the top ten themes that were provided.

Combining this with responses received by letter and email, the themes arising from the “free text” consultation responses as regard to the prioritisation of benefits were:

- A number of respondents, including some neighbouring local authorities, were supportive of the economic benefits arising from the proposed expansion and saw this as being the main benefit of growth.
- There were some queries about the economic benefits arising from the development and in particular the benefits to areas outside of Luton. There were also queries relating to the number of jobs supported by the airport and its growth and, as a result, the economic benefits arising from the development.

- Some respondents commented on the potential for the additional employment generated by the airport to result in further increased demand for housing within the local area.
- There were also queries about the UK’s tourism deficit and whether it is right to expand LTN to allow more UK residents to travel abroad.
- Some respondents suggested that the ‘polluter pays’ principle should be imposed on passengers using the airport and that this would impact on the demand levels and on the extent of economic benefits to be realised by the development. Others raised the social costs arising from increase air traffic using LTN. These were principally related to the social impact of noise.

As is evident from the table, a number of respondents took the opportunity in this free text response box to make comments about matters which did not directly relate to the prioritisation of benefits, such as concerns about noise, and opposition to expansion. These themes are addressed later in this chapter.

Theme	Theme expanded on	Percentage of those that answered the question
Noise	Concern about existing flightpaths	17%
Option preference	No expansion	16%
Air quality	Concerns about pollution	9%
Noise	Concerns about future flightpaths	7%
Congestion	Concern about traffic congestion in local roads	5%
Benefits	Concerns about unfair distribution of benefits	5%
Consultation process	Concerns about the questionnaire	5%
Noise	Concerns about night-flights	5%
Congestion	Concerns about future congestion in local roads	4%
Operations	Suggesting airport operating improvements	4%

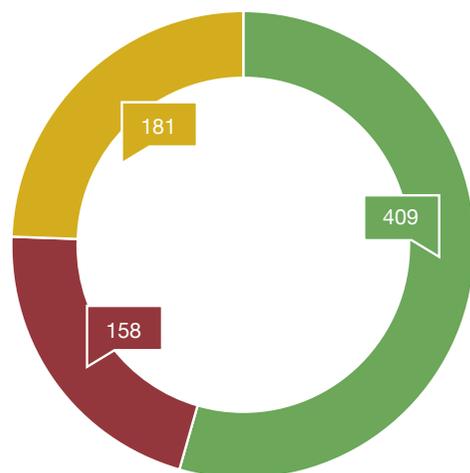
Table showing top ten themes to question 3b

QUESTION 4A

Considering the options to expand the airport

Question 4a asked:

Do you agree that our expansion strategy to make best use of the existing runway is more appropriate than pursuing an extended, realigned or second runway?



● Agree ● Disagree ● Don't know

In total, 748 respondents answered this question on the feedback form.

Part of question 4a asked respondents to 'tell us more about the reasons for their answer' and the responses are analysed below.

In total, 409 respondents agreed that "our expansion strategy to make best use of the existing runway is more appropriate than pursuing an extended, realigned or second runway".

In total, 257 of those that answered 'agree' chose to expand on their answer.

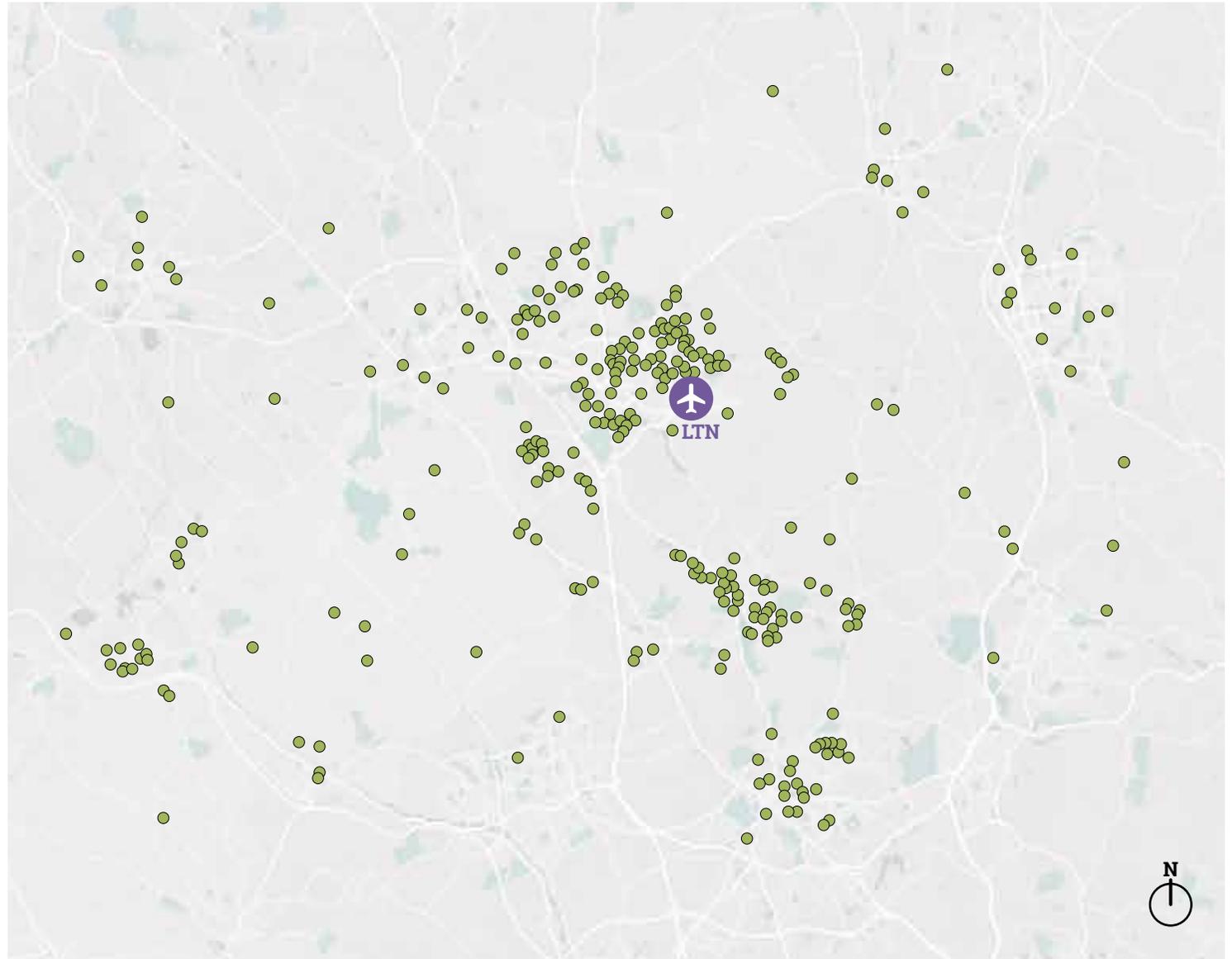
We analysed the free text answers to question 4a and have outlined in the table the top ten themes.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	Support for option 1a (double terminal solution)	25%
Option preference	No second runway	25%
Option preference	No expansion	16%
Enabling works	Understanding of the shorter time needed to carry out the work	14%
Land	Availability of land	9%
Finance	Acknowledgement of the business case/reasons for the project	9%
Finance	Understanding of the economic reasons for the project	7%
Noise	Concerns about existing flightpaths	7%
Option preference	Support expansion	7%
Noise	Concerns about night-flights	3%

Table showing top ten themes to those that agreed to question 4a

QUESTION 4A

This map shows the general locations of those that agreed to question 4a.



QUESTION 4A

Those that disagreed

In total, 158 of those that answered question 4a said that they disagreed with us that “our expansion strategy to make best use of the existing runway is more appropriate than pursuing an extended, realigned or second runway”.

In total, 141 of those that answered ‘disagree’ chose to expand on their answer.

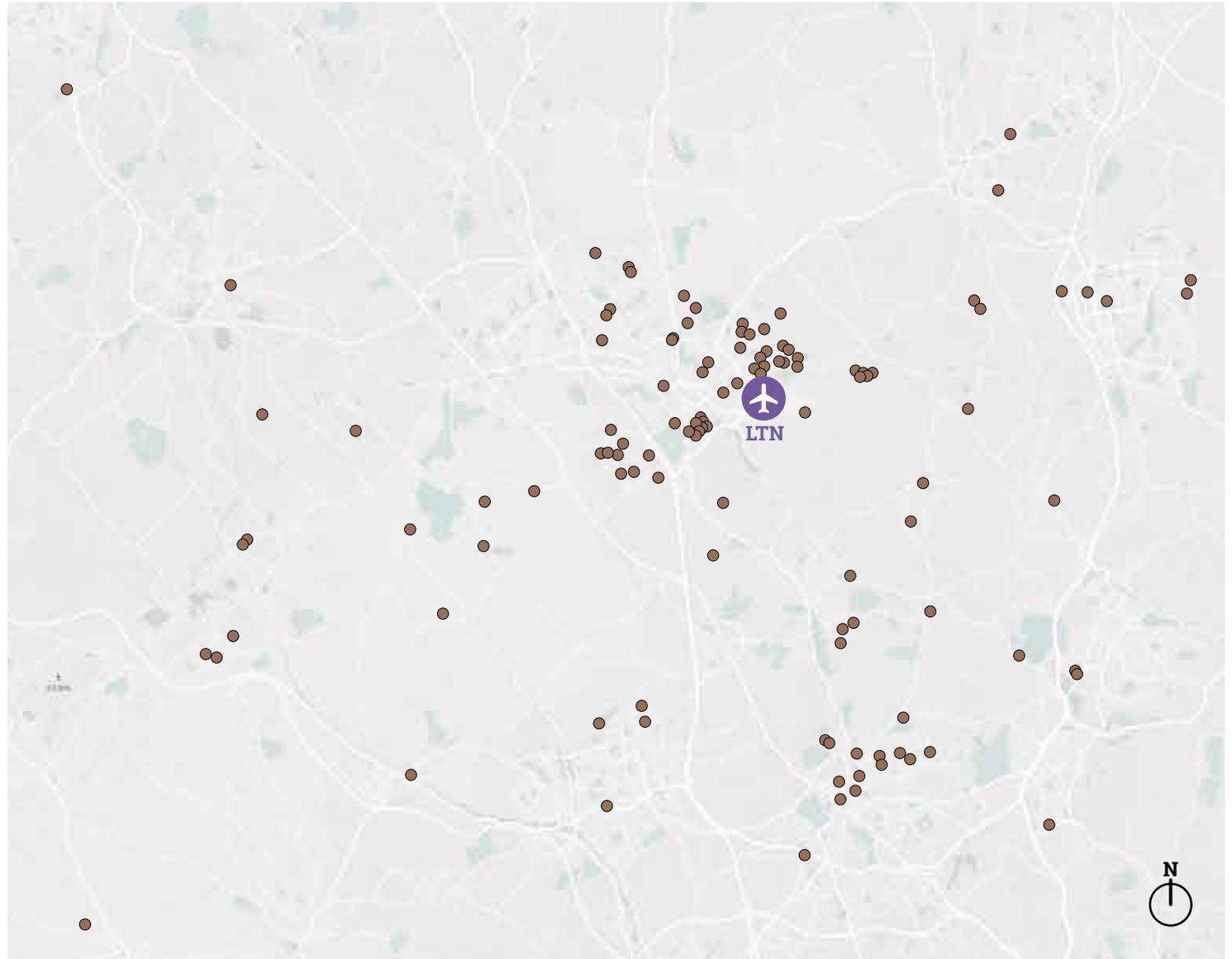
We analysed the free text answers to question 4a and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	25%
Option preference	Support to realign runway	23%
Option preference	Prefer a second runway	16%
Noise	Concerns about existing flightpaths	14%
Option preference	Support for an extended runway	11%
Noise	Concerns about future flightpaths	6%
Air quality	Concerns about pollution	5%
Benefits	Unfair distribution of benefits	4%
Noise	Concerns about night-flights	4%
Congestion	Concerns about traffic congestion in local roads	3%

Table showing top ten themes to those that disagreed to question 4a

QUESTION 4A

This map shows the general locations of those that disagreed to question 4a.



QUESTION 4A

Those that 'don't know'

In total, 181 of those that answered question 4a said that they didn't know whether to agree or disagree with us that "our expansion strategy to make best use of the existing runway is more appropriate than pursuing an extended, realigned or second runway".

In total, 114 of those that answered 'don't know' chose to expand on their answer.

We analysed the free text answers to this and have outlined in the table the top ten themes.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	45%
Noise	Concerns about existing flightpaths	10%
Noise	Concerns about future flightpaths	7%
Air quality	Concerns about pollution	6%
Consultation process	Concerns about the questionnaire	5%
Option preference	Support to realign runway	4%
Infrastructure	Need for better infrastructure (roads)	4%
Benefits	Unfair distribution of benefits	4%
Congestion	Concerns about traffic congestion in local roads	3%
Climate change	Need to reduce carbon emissions	3%

Table showing top ten themes to those that didn't know whether to agree or disagree with question 4a

The main themes arising in relation to question 4a, drawn from the tables above and response by letter and email, were as follows:

- For those respondents that agreed with our strategy, the main reason was support for option 1a. The reasons for this varied but included the environmental impact of the other options and ensuring land proposed in the other options could be used for future economic growth. This was

also the view that emerged from a number of the local authorities.

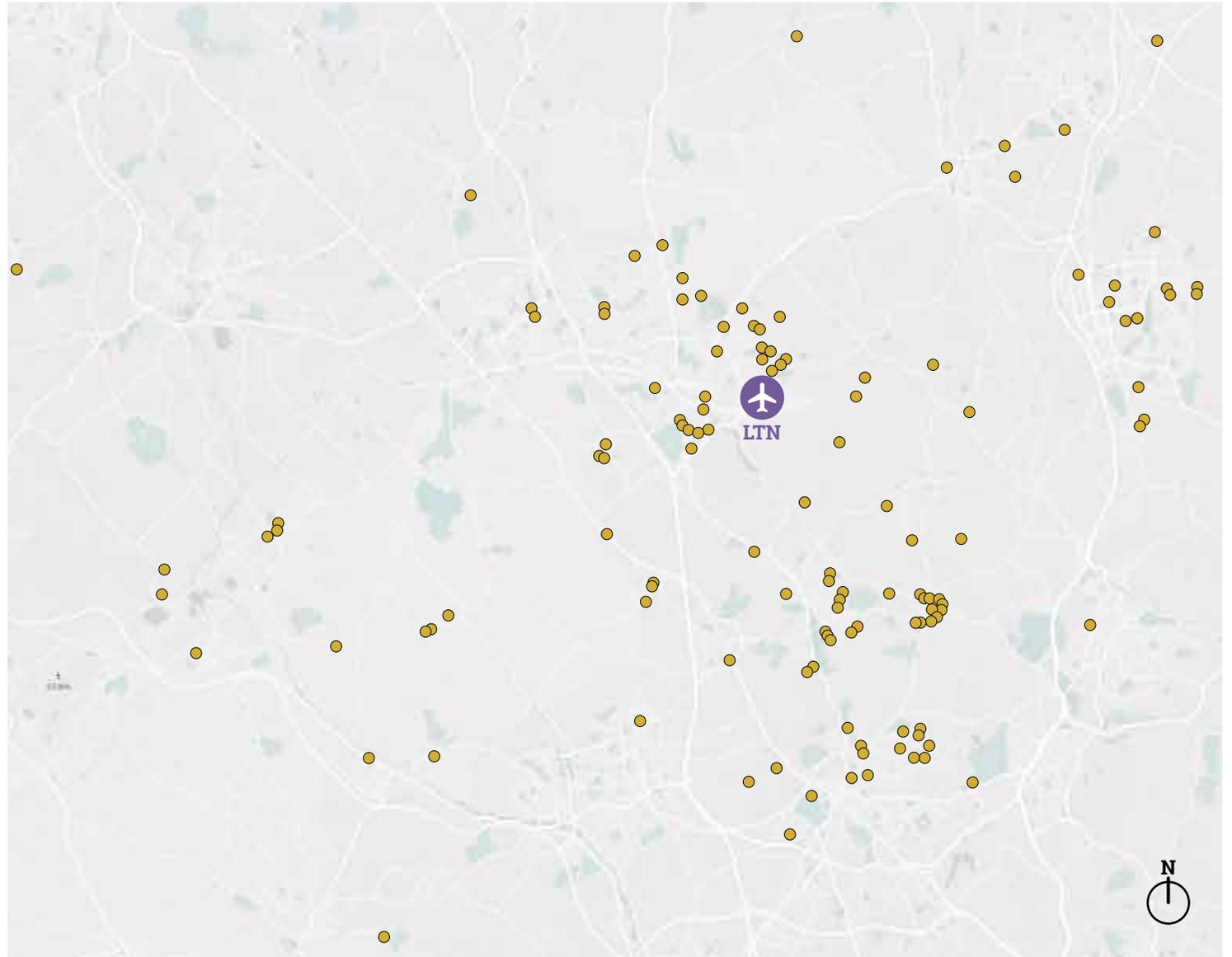
- Another main reason cited by those who agreed with our strategy was opposition to a second runway, with concerns expressed about the potential noise effects that would arise.
- For those that disagreed, or selected "don't know", in response to question 4a, the main reason given was that

there should be no expansion at LTN. A number of those who agreed with the proposal to make best of use of the existing runway instead of an extended, realigned or second runway, also took the opportunity to assert their overall preference for no expansion.

- By contrast, two key themes mentioned by those who disagreed with our proposed strategy was that they preferred a realigned runway or a second runway.
- Notwithstanding that the question did not directly ask for comments on the business case for the options, a number of respondents were keen to understand the business case for the expansion proposals generally.
- A number of the other themes mentioned in response to question 4a related to the impacts of expansion and these are expanded on later in this chapter. In addition, some consultees felt they were not provided with sufficient information to be able to answer the question.

QUESTION 4A

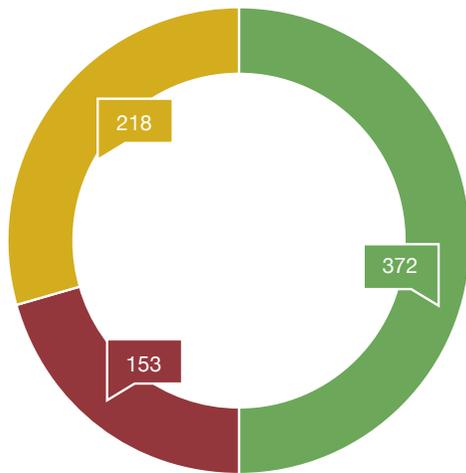
This map shows the general locations of those that didn't know whether to agree or disagree with question 4a



QUESTION 4B

Question 4b asked:

We think that development to the north side of the runway is the most appropriate solution for making best use of the existing runway at London Luton Airport. Our proposal is therefore to focus on options to the north of the runway and to discontinue the southern option at this stage. Do you agree? Please tick one box.



● Agree ● Disagree ● Don't know

In total, 743 respondents answered this question on the feedback form.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	Support for option 1a (double terminal solution)	18%
Option preference	No expansion	9%
Option preference	Support for an extended runway	5%
Option preference	No second runway	4%
Land	Issues with the ownership of the land and property	3%
Climate change	Need to reduce carbon emissions	2%
Congestion	Concerns about traffic congestion in local roads	2%
Landscape and visual	Wish to protect land south of runway	2%
Option preference	Support for option 1b (a single terminal complex to the west of the site)	2%
Option preference	Support for option 1c (a single terminal complex to the east of the site)	2%

Table showing top ten themes to those that agreed to question 4b

Those that agreed

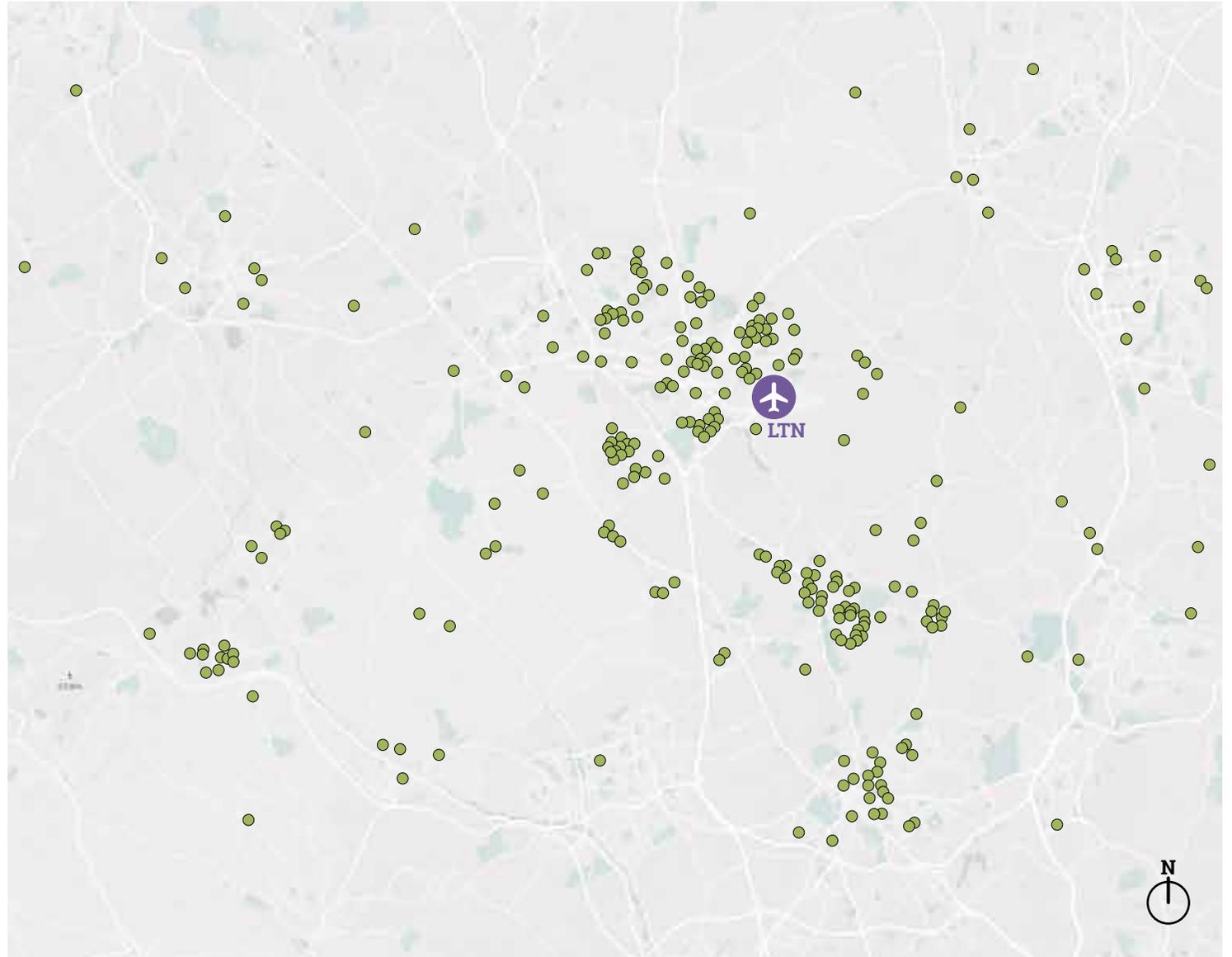
In total, 372 respondents agreed with our statement to focus our attention on the north of the runway and to discontinue considering the southern option. The remaining were mainly split between disagreeing and not knowing.

Of the 372 that agreed with us, 171 respondents chose to expand on their answer in question 4b.

We analysed the free text answers of those that agreed to question 4b and have outlined in the table the top ten themes that were provided.

QUESTION 4B

The following map shows the general locations of people that agreed with this question.



QUESTION 4B

Those that disagreed

In total, 153 disagreed with our statement to focus our attention on the north of the runway and to discontinue the southern option.

In total, 123 of those that answered 'disagree' chose to expand on their answer in question 4b.

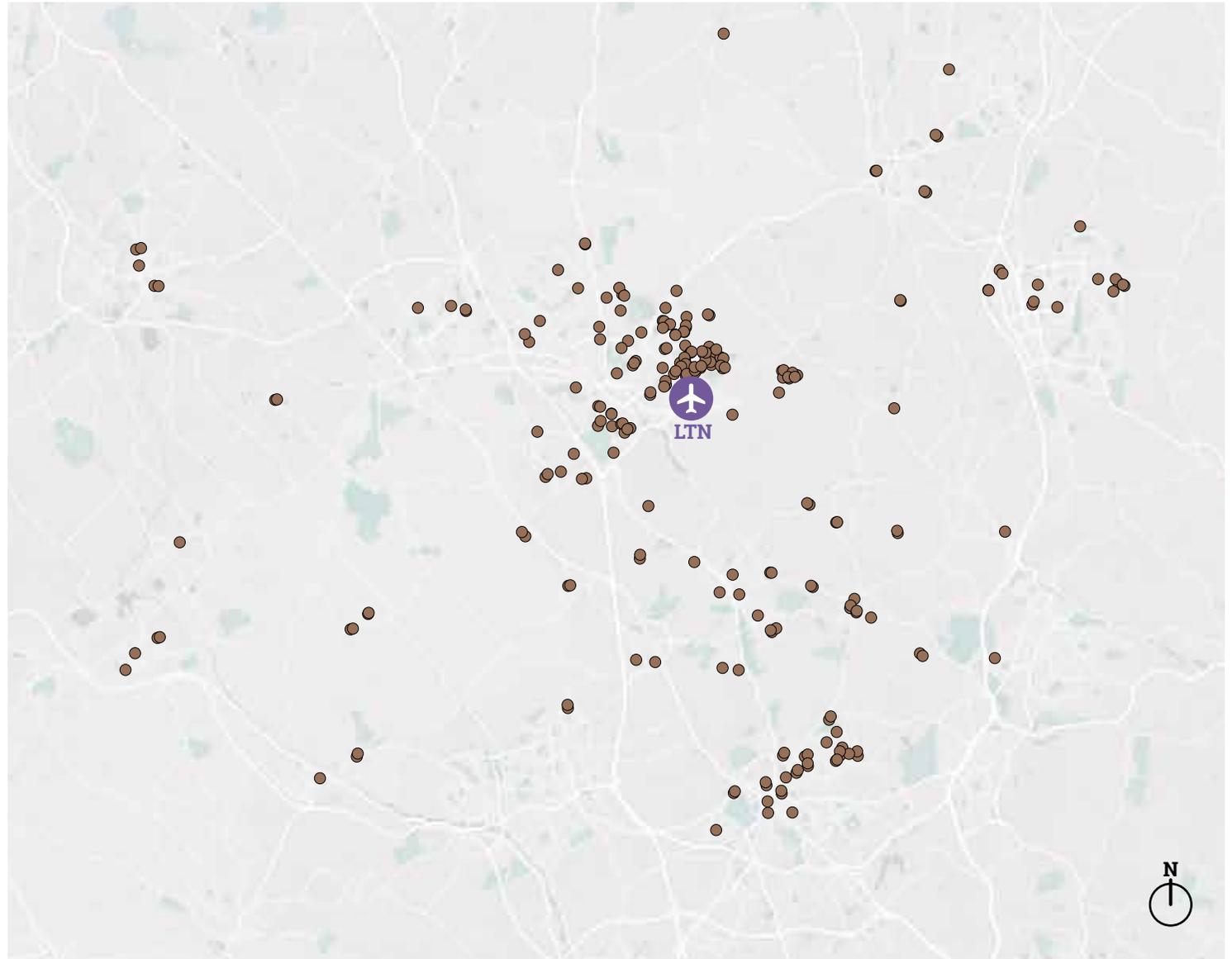
We analysed the free text answers to those that disagreed to question 4b and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	33%
Option preference	Support for option 2 (new terminal and apron capacity to the south of the runway)	13%
Wigmore Valley Park	Want to retain the park as it is	11%
Air quality	Concerns about pollution	3%
Congestion	Concerns about future congestion in local roads	2%
Consultation process	Concerns about the questionnaire	2%
Option preference	Support for option 1a (a double terminal solution)	2%
Option preference	Support to realign runway	2%
Option preference	Support for a second runway	2%
Option preference	Support for an extended runway	2%

Table showing top ten themes to those that disagreed to question 4b

QUESTION 4B

The following map shows the general locations of people that disagreed with this question.



QUESTION 4B

Those that 'don't know'

In total, 218 of those that answered question 4b said that they didn't know whether to agree or disagree with our statement to focus our attention on the north of the runway and to discontinue the southern option.

In total, 94 of those that answered chose to expand on their answer.

We analysed the free text answers to this and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	34%
Noise	Concerns about future flightpaths	6%
Consultation process	Concerns about the questionnaire	6%
Option preference	Support for option 1a (double terminal solution)	5%
Air quality	Concerns about pollution	3%
Congestion	Concerns about traffic congestion in local roads	2%
Climate change	Need to reduce carbon emissions	2%
Wigmore Valley Park	Want to retain the park as it is	2%
Option preference	Support for option 2 (new terminal and apron capacity to the south of the runway)	2%
Option preference	Support to realign runway	2%

Table showing top ten themes to those that didn't know whether to agree or disagree to question 4b

The main themes arising in relation question 4b, drawn from both the feedback forms and from responses by letter and email, are shown in the tables above. In summary:

- As shown in the responses to question 4a, overall a significant number of respondents agreed that the main focus should be on the northern options.

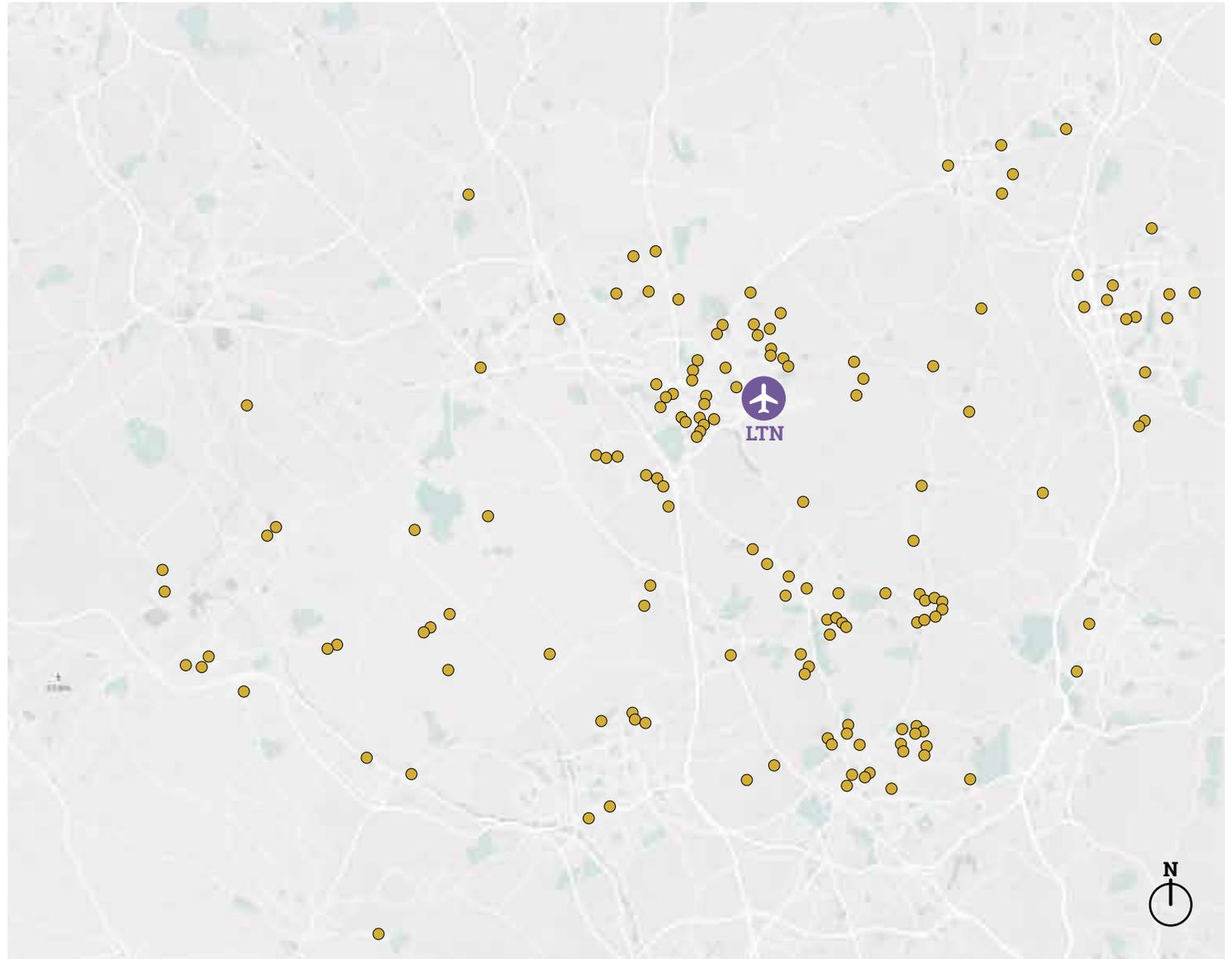
- For those who agreed with our conclusions, many responses referred to the available land, the environmental impact, impacts on passengers and the surface access impacts as influencing their decision.
- A minority of the responses that disagreed with the discontinuation of considering the southern option indicated that their reason for doing

so was being against expansion at LTN, rather than directly commenting on the options or appraising them.

- In addition to those opposed to any expansion, some consultees disagreed with our emerging preference of the northern option and the discontinuation of considering of the southern option. Reasons included that it would bring development closer to the main neighbouring development, and encourages additional traffic, whereas development to the south would have less impact on the residential areas of Wigmore and would avoid impacts on Wigmore Valley Park.

QUESTION 4B

The following map shows the general locations of those that didn't know whether to agree or disagree to question 4b.

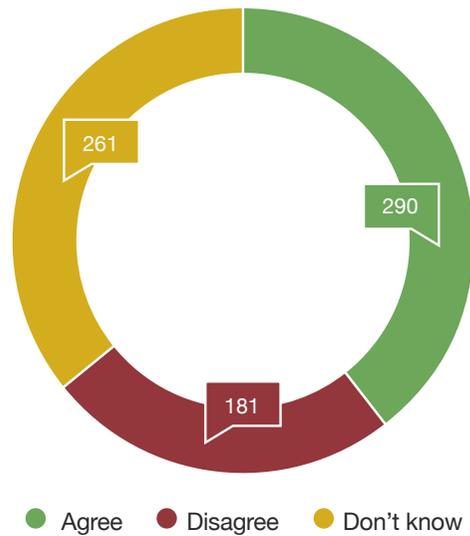


QUESTION 4C

Question 4c asked:

If development is taken forward to the north side of the runway, we think a two-terminal solution is the most appropriate solution. Do you agree?

In total, 732 respondents answered question 4c of the feedback form.



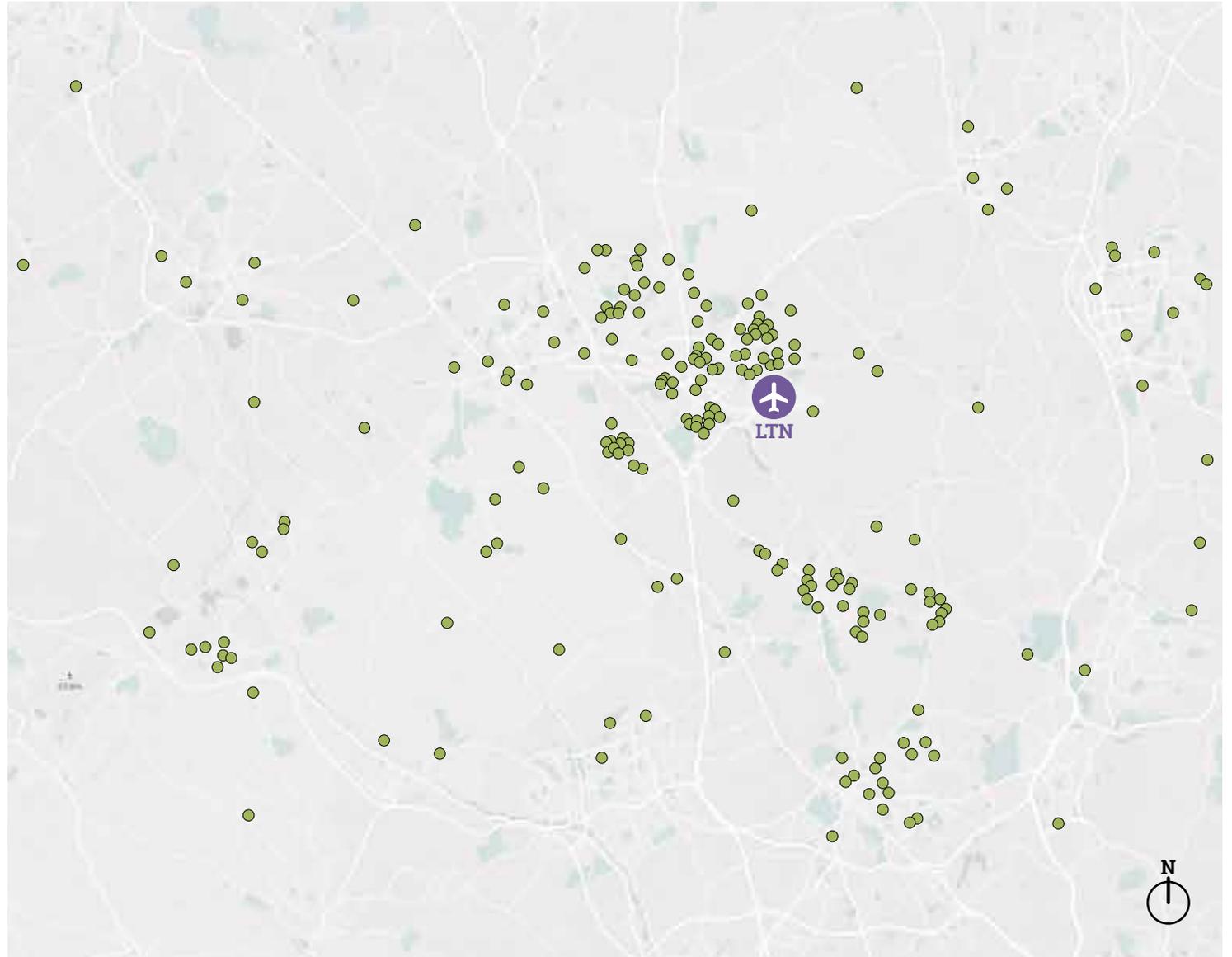
Theme	Theme expanded on	Percentage of those that answered the question
Option preference	Support for option 1a (double terminal solution)	19%
Option preference	No support option 2 (new terminal and apron capacity to the south of the runway)	4%
Option preference	No expansion	3%
Option preference	Support expansion	3%
Operations	Suggestions to improve airport operations	3%
Public transport	Improve roads (concerns with road networks and need to improve to support the option)	2%
Congestion	Existing traffic congestion around the airport	2%
Construction nuisance	Need for a management plan	2%
Finance	Acknowledgement of the business case/reasons for the project	2%
Congestion	Concerns about future traffic congestion around the airport/need improvements	1%

Table showing top ten themes to those that agreed to question 4c

Of the 291 that agreed with the two-terminal option, 143 respondents chose to expand on their answer in question 4c. We analysed the free text answers of those that agreed to question 4c and have outlined in the table the top ten themes that were provided.

QUESTION 4C

The following map shows the locations of people that agreed with this question.



QUESTION 4C

Those that disagreed

In total, 181 respondents disagreed with our statement. Of these, 138 respondents chose to expand on their answer in question 4c. We analysed the free text answers of those that disagreed to question 4c and have outlined in the table the top ten themes.

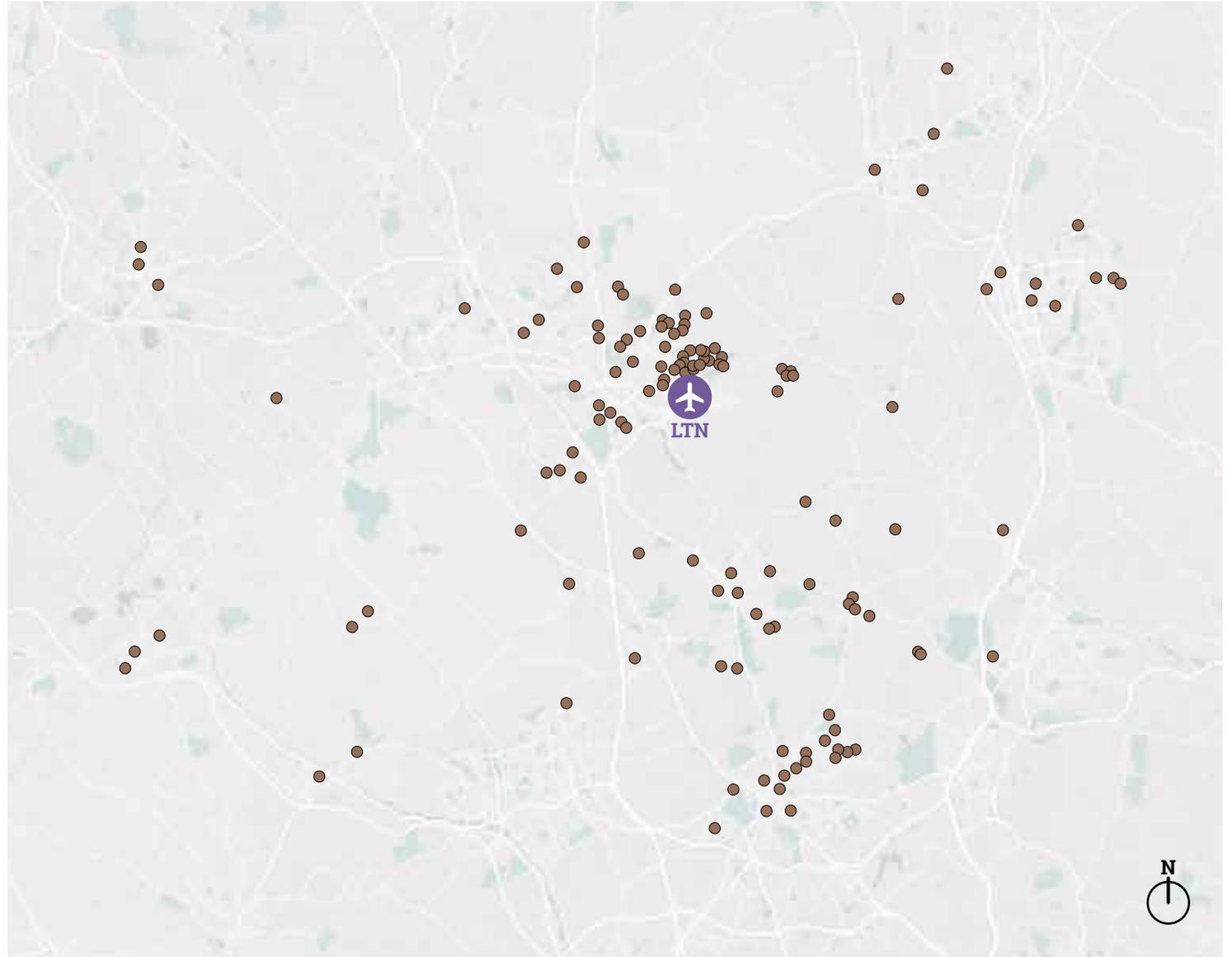
Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	38%
Congestion	Concerns about future congestion in local roads	6%
Air quality	Concerns about pollution	6%
Operations	Suggesting airport operating improvements	5%
Noise	Concerns about future flightpaths	4%
Option preference	Support for option 1b (single terminal complex to the west of the site)	4%
Option preference	Support for option 2 (a new terminal and apron capacity to the south of the runway)	4%
Noise	Concerns about existing flightpaths	4%
Wigmore Valley Park	Want to retain the park as it is	4%
Option preference	Support for option 1c (a single terminal complex to the east of the site)	2%

Table showing top ten themes to those that disagreed to question 4c

It was also said that none of the options presented for consultation looked at undertaking any enhancement/redevelopment to the existing airport terminal.

QUESTION 4C

The following map shows the general locations of people that disagreed with this question.



QUESTION 4C

Those that don't know

In total, 261 respondents said they didn't know in response to our statement. Of these, 89 respondents chose to expand on their answer in question 4c. We analysed the free text answers of those that agreed to question 4b and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	21%
Consultation process	Concerns about the questionnaire	9%
Noise	Concerns about future flightpaths	7%
Noise	Concerns about existing flightpaths	3%
Wigmore Valley Park	Want to retain the park as it is	3%
Option preference	Support for option 1a (double terminal solution)	3%
Air quality	Concerns about pollution	2%
Climate Change	Need to reduce carbon emissions	2%
Operations	Suggesting airport operating improvements	2%
Finance	Acknowledgement of the business case/reasons for the project	2%

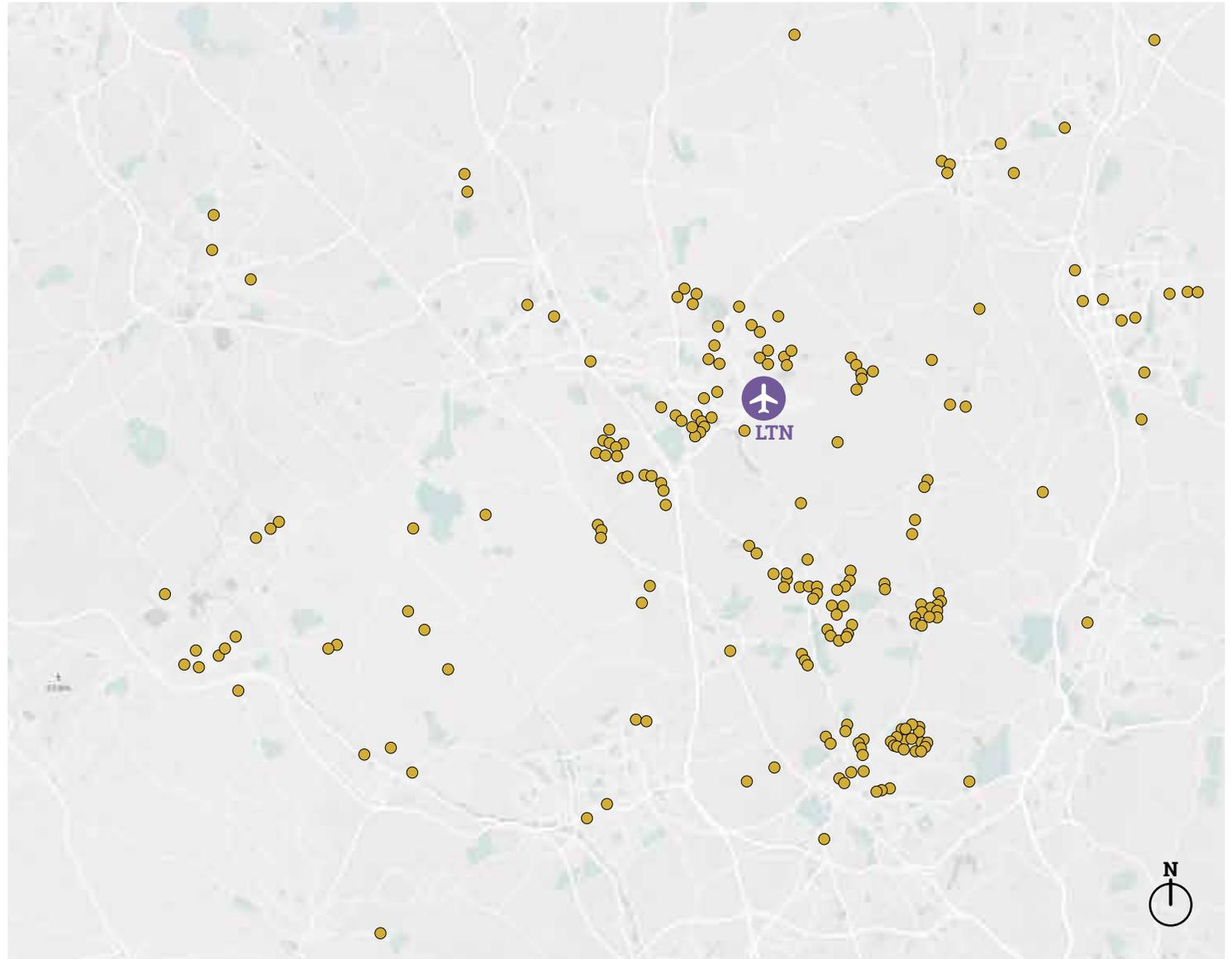
Table showing top ten themes to those that didn't know whether to agree or disagree to question 4c

The main themes arising in relation to this question, drawn from both the feedback forms and from responses by letter and email are shown in the tables above. In summary:

- In total, 291 respondents agreed with our statement that a two-terminal solution is the most appropriate solution if development is taken forward to the north side of the runway. Consultees referred to the passenger flows and reduced crowds for reasons in support of this option.
- Local authorities who preferred the two terminal option referenced an ambition to avoid congestion in the terminal buildings by separating them out, and referred to this option as more deliverable.
- For those that disagreed with our statement, explanations revolved around opposition to expansion and the surface access impacts associated with a two-terminal building.

QUESTION 4C

The following map shows the general location of those that didn't know whether to agree or disagree to question 4c.



QUESTION 5A

Question 5 – Managing the impacts

Question 5a asked:

We have identified the following key impacts which we consider to be particularly important in the context of expanding London Luton Airport. Please rank these in order from 1 to 10, where 1 is the least important and 10 is the most important to you: Please tick one box per row and one box per column.

For question 5a we asked respondents to tick one box per row and one box per column i.e. rank the key impacts in order 1 to 10. However some respondents did not complete this question as asked (e.g. they ranked all of the answers equally, or did not answer them all).

In total, 784 respondents answered this question in some way.

The below table captures the average order of preference, whether or not the question was answered as asked:

Priority	Ranking (1 = least important, 10 = most important)
Noise	10
Flightpaths	9
Air quality	8
Climate change	7
Surface access	6
Landscape and visual	5
Biodiversity	4
Enabling works (e.g. earthworks and replacement public open space)	3
Heritage	2
Land ownership and acquisition	1

Of those who completed the feedback form as asked the results were as follows:

Priority	Ranking (1 = least important, 10 = most important)
Noise	10
Flightpaths	9
Air quality	8
Surface access	7
Climate change	6
Biodiversity	5
Landscape and visual	4
Enabling works (e.g. earthworks and replacement public open space)	3
Heritage	2
Land ownership and acquisition	1

In either case it is evident that the most important issues for consultees were noise, flightpaths, air quality, surface access and climate change.

QUESTION 5B

Question 5b asked:

Please tell us if there are any other key impacts you think we need to consider.

In total, 461 respondents answered this question and outlined key impacts that we should consider. We analysed the free text answers to question 5b and have outlined in the table the top ten themes.

The main themes arising in relation to the impacts, drawn from both the feedback forms and from responses by letter and email, are shown in the table above. The most common response from consultees related to noise impacts concerns for those living under existing or future flightpaths, notwithstanding noise was one of the ranking choices in question 5a. There was also a concern about pollution from the expansion proposals, again repeating one of the ranking choices in question 5a.

Theme	Theme expanded on	Percentage of those that answered the question
Noise	Concern with existing flightpaths	15%
Noise	Concern with future flightpaths	13%
Air quality	Concerns about pollution	10%
Option preference	No expansion	10%
Congestion	Concerns about future congestion in local roads	9%
Noise	Concerns about night-flights	9%
Congestion	Concern about traffic congestion in local roads	8%
Climate Change	Need to reduce carbon emissions	4%
Public transport	Rail (concerns with capacity and networks)	3%
Parking	Parking in the wrong place (e.g. residential roads)	3%

Table showing top ten themes to question 5b

QUESTION 5C

Earthworks

Question 5c asked:

We propose to take earth from the site to avoid the significant extra traffic burden on the local area. Do you have any comments on this proposal?

In total, 494 respondents answered this question on the feedback form. We analysed the free text answers to question 5c and have outlined in the table the top ten themes that were provided.

The main themes arising in relation to the earthworks, drawn from both the feedback forms and from responses by letter and email, were as follows:

- On the whole, respondents were generally supportive of soil being sourced within the site area rather than material being imported via lorries to the site, which would result in traffic congestion. Despite this, there is a recurring theme that this approach is “the lesser of two evils” with large scale opposition to the additional highways impact caused by importing material by road.
- The majority of the comments from respondents had an appreciation of the major scale of earthworks required to support the creation

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	10%
Congestion	Concerns about traffic congestion in local roads	3%
Noise	Concerns about existing flightpaths	3%
Landscape and visual	Understanding of the arguments for the proposed approach of construction	3%
Wigmore Valley Park	Want to retain the park as it is	3%
Construction nuisance	Concerns about potential traffic levels/nuisance caused during construction	3%
Congestion	Concerns about future congestion in local roads	2%
Air quality	Concerns about pollution	2%
Landscape and visual	Concerns about loss of quality land	2%
Traffic modelling	Need for traffic modelling to take place	2%

Table showing top ten themes to question 5c

of the platform and therefore the significant impact on the existing character of the landscape resulting from the preferred proposals. As a consequence, a number of respondents sought clarity or further detail on the proposed earthworks solution, particularly the associated remediation and mitigation of Wigmore Valley Park. Many respondents highlighted information related to the earthworks which they felt was not clear or was perceived to be missing.

- Two local authorities expressed strong disappointment at not being consulted ahead of the consultation document release.
- The unknown impact on the existing topography caused by the enabling works was also a recurring theme and many of the responses identified a number of concerns which they considered should be addressed in the landform design. Recommendations from respondents included that due regard should be

paid to “the distinct landform features of the plateau and steep incised dry valleys”, “the prominence and height of the platform and built structures” and “the treatment of the platform edges in relation to the existing natural topography.”

- There were some specific concerns relating to landfill; such as building on landfill being perceived as dangerous, containing toxic waste or unexploded ordnances (UXO). It was also highlighted that there was no mention in the consultation document of the likelihood that much of the on-site material could be obtained from a former landfill site and as such there was no reference to the need to “consider measures to mitigate the environmental impact of its disturbance, its storage, its treatment, its transport, its re-use or its disposal”.
- Other justifications for supporting the proposals included references to it being “cheaper” to use excavated earth from within the airport boundary and a general perception that the proposal “made sense”.
- Whilst some of the respondents noted that many impacts of enabling works will have intrinsically shorter term implications, they also

QUESTION 5D

emphasised the need to consider construction impacts whilst assessing the proposal, notably in relation to noise and dust. A response from one local authority stated “there does not appear to be mention in the enabling works section of the need for any construction workers’ compounds, whilst issues such as night working and percussive piling will also need to be addressed fully”.

Public open space

Question 5d asked:

When designing and constructing a replacement public open space, how would you prioritise the following? Please rank in order from 1 to 8, where 1 is the least important and 8 is the most important to you.” The following were options to order:

1 Park facilities (e.g. café, toilets, parking areas etc.)

2 Park outlook

3 Natural habitats (e.g. flora and fauna)

4 Sports and recreational facilities (e.g. sports pitches, running / cycling routes, skate parks)

5 Quality of children’s play areas

6 Accessibility from the surrounding community

7 Surfaced and / or accessible paths (including for disabled users)

8 Connections to other rights of way

In total, 620 respondents answered question 5d on the feedback form.

Table captures the average order of preference, whether or not the question was answered as asked

Priority	Ranking (1 = least important, 8 = most important)
Natural habitats (e.g. flora and fauna)	8
Accessibility from the surrounding community	7
Park facilities (e.g. café, toilets, parking areas etc.)	6
Quality of children’s play areas	5
Sports and recreational facilities (e.g. sports pitches, running / cycling routes, skate parks)	4
Surfaced and / or accessible paths (including for disabled users)	3
Park outlook	2
Connections to other rights of way	1

Of those who completed the feedback form as asked the results were as follows

Priority	Ranking (1 = least important, 8 = most important)
Natural habitats (e.g. flora and fauna)	8
Park facilities (e.g. café, toilets, parking areas etc.)	7
Accessibility from the surrounding community	6
Sports and recreational facilities (e.g. sports pitches, running / cycling routes, skate parks)	5
Quality of children’s play areas	4
Park outlook	3
Surfaced and / or accessible paths (including for disabled users)	2
Connections to other rights of way	1

QUESTION 5E

Question 5e asked:

Do you have any other priorities that a replacement public open space should provide, or any other comments relating to our approach to providing replacement public open space?

In total, 323 respondents answered question 5e and outlined key priorities that we should consider. We analysed the free text answers to question 5e and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Wigmore Valley Park	Retaining the park as it is	20%
Option preference	No expansion	13%
Landscape and visual	Suggestions for landscape and visual improvements	7%
Wigmore Valley Park	Impact on park landscape	5%
Biodiversity	Support for a biodiversity strategy	4%
Noise	Concerns about future flightpaths	3%
Noise	Concerns about existing flightpaths	3%
Landscape and visual	Easy access to local space	3%
Wigmore Valley Park	Park not important	3%
Wigmore Valley Park	Concerns with impact on children's space	2%

Table showing top ten themes to question 5e

Combining the feedback form responses with those contained in letter and email responses, the main comments made by respondents on replacement public open space were as follows:

- There was sense that the loss of Wigmore Valley Park for development was essentially a 'done deal' and a view that LLAL had not really considered options to retain the existing area of parkland (i.e. containing expansion within the existing airport land or land outside of Wigmore Valley Park). There were suggestions that LLAL should omit the commercial element of the airport expansion project, to enable more of the existing parkland to be saved.
- Concerns were raised that the proposals would result in a loss of valued biodiversity and tree cover and that a replacement area of parkland may take years to establish and compensate for such loss. There were concerns that the community may be without parkland for a period and nervousness about how long users would be without public open space.

QUESTION 5E

- Concerns were made about the quality of parkland that could be delivered in agricultural land in North Hertfordshire and a scepticism that LLAL would deliver a replacement area of public open space that was commensurate in size or quality to what would be lost. There were concerns that replacement parkland would be further away from the community it serves, and that the consultation information did not appear to give adequate importance to the replacement of parkland and a view accordingly that it should be more of a key priority for LLAL.
- A sense that relocating the park into agricultural land in North Hertfordshire would still result in a net loss of undeveloped land and green infrastructure. There was a related concern that the replacement parkland may introduce inappropriate development into the Green Belt.
- A small number of respondents questioned why LLAL were giving so much importance in their consultation documentation to the replacement parkland and a few queried whether replacement parkland was required at all. A few also questioned why we would replace the parkland within North Hertfordshire and suggested that replacement parkland should instead be re-provided within Luton Borough.
- Local authority respondents advised that the replacement parkland will fundamentally change the character of the existing agricultural land. The location, nature and function of the replacement parkland therefore requires a clear vision based on an understanding of local needs, and management and on-going maintenance arrangements need to be further developed. They also identified a need for the replacement park to relate to the proposed housing to the east of Luton and benefit the new community that will occupy this area.
- A local authority respondent also commented that the replacement park should relate to the conservation and enhancement of important strategic green infrastructure routes. It was also said that there is a need to consider the impact of visitors to the replacement park upon the surrounding roads.
- Various suggestions were made about the parkland design process and proposed layout of parkland, including that it should:
 - be inclusive for all users, with accessible routes and facilities for disabled children (i.e. accessible play equipment, seating and toilets);
 - connect to the wider footpath network and communities of North Hertfordshire, increase open access land and make better provision for dog walkers and those moving through the park (e.g. litter bins, benches, dog waste bins etc.);
 - make provision for plane spotting;
 - include waterbodies, lakes, fountains or even a lido;
 - expand the existing allotments;
 - include measures that encourage users, both young and old, to be more active (e.g. Multi Use Game Area, exercise machines, tennis courts, badminton courts, table-tennis tables, etc.);
 - include measures to address the security and safety issues present at the existing Wigmore Valley Park (i.e. access by unauthorised users etc.);
- include some facilities at its eastern end (e.g. small car park, toilets, picnic area etc.);
- be 'natural' in appearance, with opportunities included for users to explore nature and get a multi-sensory experience (e.g. forest walks, wildflower meadows, bee-keeping areas, water-bodies etc.);
- include mature vegetation, to provide shade and visual screening to the development.
- There were suggestions that LLAL should engage with local partners and user groups to help develop our proposals for the replacement parkland (e.g. school children, community groups, organisations etc.).

QUESTION 5F

Noise

Question 5f asked:

We recognise that expansion of London Luton Airport could bring associated noise impacts. How often are you currently affected by the following sources of airport-related noise?

In total, 804 respondents answered this question. The table shows the breakdown of the answers provided:

From this, it is clear that for the majority of respondents, the main noise impact arises from departing and arriving aircraft.

	Frequently	Occasionally	Not at all	Don't know
Noise from departing and arriving aircraft	565	156	79	4
Noise from aircraft on the ground	144	148	431	22
Noise from increased road traffic	169	194	321	59
Temporary noise during construction	78	116	419	122

Table shows the breakdown of the answers provided

QUESTION 5G

Question 5g focused on noise and was another ranking question. We asked:

We are considering a range of potential measures to mitigate noise impacts from future airport expansion – see pages 54 to 57 of the consultation document for more information about noise mitigation.

Please rank the following in order from 1 to 7, where 1 will bring the least benefit and 7 the most benefit to you.

- 1 Restricting aircraft movements at night from 23:30-05:59 hrs to the existing permitted limit***
- 2 Providing incentives for airlines to adopt quieter aircraft***
- 3 Optimising flightpaths to mitigate the impact of noise from arriving and departing aircraft***
- 4 Reviewing the Noise Insulation Scheme which provides compensation for homeowners and businesses***
- 5 Improving use of space, reducing taxi time and queuing to reduce ground noise***
- 6 Using acoustic barriers to reduce ground and surface access noise***
- 7 Managing noise and vibration impacts during construction***

In total, 757 respondents answered question 5g.

Table captures the average order of preference, whether or not the question was answered as asked

Priority	Ranking (1 = least important, 7 = most important)
Restricting aircraft movements at night from 23:30-05:59 hrs to the existing permitted limit	7
Optimising flightpaths to mitigate the impact of noise from arriving and departing aircraft	6
Providing incentives for airlines to adopt quieter aircraft	5
Reviewing the Noise Insulation Scheme	4
Using acoustic barriers to reduce ground and surface access noise	3
Improving use of space, reducing taxi time and queuing to reduce ground noise	2
Managing noise and vibration impacts during construction	1

Of those who completed the feedback form as asked, the results were as follows

Priority	Ranking (1 = least important, 7 = most important)
Restricting aircraft movements at night from 23:30-05:59 hrs to the existing permitted limit	7
Optimising flightpaths to mitigate the impact of noise from arriving and departing aircraft	6
Providing incentives for airlines to adopt quieter aircraft	5
Reviewing the Noise Insulation Scheme	4
Improving use of space, reducing taxi time and queuing to reduce ground noise	3
Using acoustic barriers to reduce ground and surface access noise	2
Managing noise and vibration impacts during construction	1

QUESTION 5H

Question 5h asked:

Do you have any comments or suggestions about the above measures that we are proposing in order to address noise impacts?

In total, 517 respondents answered this question.

We analysed the free text answers to question 5h and have outlined in the table the top ten themes.

Theme	Theme expanded on	Percentage of those that answered the question
Noise	Concerns about night-flights	26%
Noise	Concerns about existing flightpaths	24%
Noise	Concerns about future flightpaths	21%
Option preference	No expansion	13%
Noise	Need/support for quieter planes in the future	9%
Operations	Need more information on new flightpaths	5%
Noise	Double-glazing/triple glazing of properties	3%
Noise	Compensation	3%
Air quality	Concerns about pollution	3%
Consultation process	Concerns about the questionnaire	2%

Table showing top ten themes to question 5h

Combining the feedback form responses with those contained in letter and email responses, the issues emerging from consultation concerning noise were as follows:

- The dominant theme is that current levels of aircraft noise are considered unacceptable and have increased significantly over the recent past. A number of responses from a variety of locations stated that it is not possible to have a continuous conversation in the garden due to noise from overflying aircraft. It was noted that aircraft movements at night cause sleep disturbance and are a key concern, windows need to be opened for ventilation during hot periods so there is little protection from air noise offered by glazing.
- The comments about noise and flightpaths covered the general impact of overflying aircraft, including altitude. A number of respondents highlighted concentration of noise, including through the most recent changes due to RNAV routes (which has allowed a narrower flight path between St Albans and Harpenden), and noise distribution in the future. Some believed that aircraft should be directed towards urban areas where it was less noticeable compared to the ambient/background noise,

QUESTION 5H

whilst other respondents suggested aircraft should be directed over rural areas where there was a smaller population to be impacted. A number of respondents also highlighted the impact of airspace design on the Chilterns Area of Outstanding Natural Beauty (AONB) in particular where there is higher ground and aircraft are effectively at a lower altitude relative to the population.

- There was a wide range of locations from which people were concerned about noise and flightpaths, including St Albans, Harpenden, Welwyn Garden City, Knebworth, Tring, Stevenage, Berkhamsted and Leighton Buzzard, as well as rural villages. For example, it was noted that Breachwood Green is significantly affected by air noise. There were some concerns of flights deviating from the principal arrival path.
- A lack of respite routes was mentioned a number of times, as well as the constraints applied to airspace due to the proximity with other London airports (such as Heathrow's Bovingdon Stack), which results in aircraft departing from LTN being held at a lower altitude than

would otherwise be the case. Some consultees believed that expansion of other airports in London would add further to this interaction problem, and some were concerned that airspace simply could not handle all the forecast growth in London, so were sceptical that LTN could accommodate this level of activity.

- Night noise concerns were related to both one-off events and also the overall level of scheduled flying at night time, with flights by cargo aircraft in the early hours of the morning mentioned specifically.
- It was considered that aircraft lowering undercarriage early over Knebworth and Stevenage was unnecessary. The late landing gear trial over Stevenage was considered effective at reducing air noise, but it was said that compliance with this operational procedure has dropped off since the trial finished. It was suggested that this should be adopted as standard practice to minimise noise at both Stevenage and Knebworth.

- Some consultees expressed the view that the current LLAOL Noise Action Plan has not been successful at reducing the level of air noise and complaints have increased and that that current limits from planning conditions are not being enforced and have been exceeded. There were views that promises from previous expansions concerning noise have not been delivered, and that LLAL should take more responsibility for noise pollution. It was said that existing problems should be dealt with before any expansion should be considered. Related to this, there was a view that it is not acceptable for Luton Borough Council to be both the owner of LLAL and the overseer of noise pollution.
- One local authority requested that the DCO needs to address how many more people would be affected by air noise as a result of the expansion and that the implication of the new World Health Organisation (WHO) noise guidelines should be considered.

- Some specific issues raised by respondents to manage air noise were as follows:
 - there were a number of suggestions and comments on how noise and flightpaths should be considered and mitigated against within the process; greater controls over night noise were suggested, including: a complete ban on night flights, a reduction in night movements, a reduction in general aviation movements at night, and a ban on night flights during specific night periods to provide quiet periods, and banning cargo operations at night was suggested by several respondents;
 - setting maximum levels of movements over certain areas as part of the airspace redesign, or development of respite routes were suggested by some;
 - operationally, there were requests for steeper climbs and descents to increase aircraft altitude over communities, as well as later deployment of the undercarriages on landing (as per the recent LLAOL trial);

QUESTION 5H

- noise management through incentives to airlines for operating quieter aircraft or banning noisier aircraft (particularly at night) were key themes as part of noise mitigation policies which could be implemented by the airport, and it was commented that the uptake of new quieter aircraft should be quicker;
- there were views that the current system of fines is not strong enough so a fining system should be adopted that suitably punishes airlines for not following defined operational procedures;
- some local authorities supported the noise mitigation measures that were listed at the consultation and have requested to be part of the Noise Envelope Design Group (NEDG).
- Comments were received about noise impacts other than from air noise:
 - it was said that ground noise from engine warm ups, taxiing, engine testing at night affects nearby communities;
 - there were suggestions to stop/reduce airlines running engines during maintenance checks;
 - there was a view that noise impact from additional road traffic as a result of the expansion will reduce quality of life;
 - there were comments that nearby communities may be impacted due to noise and vibration generated from earthworks/construction activities.
- One local authority expressed concern over the lack of detail provided on baseline noise monitoring. Some local authorities requested a commitment to an agreed methodology for the assessment of noise that includes definition of baseline noise levels and predictions of future noise increases as a result of the proposed expansion.
- One local authority suggested they could facilitate baseline noise monitoring and they would also like to see a number of measures incorporated in the new LLAOL Noise Action Plan.

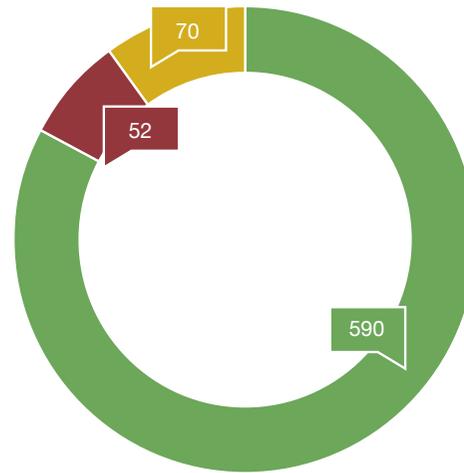
QUESTION 5I

Surface Access

Question 5i asked:

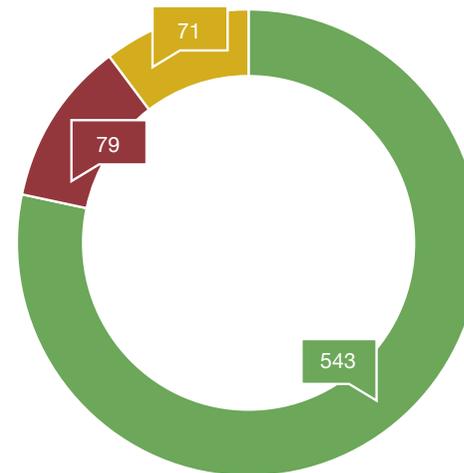
Pages 58 to 60 of the consultation document explain our surface access strategy. Do you agree with our key objectives to...? Please tick one box for each objective

1 Promote greater use of public and sustainable modes of transport than London Luton Airport currently achieves?



● Agree ● Disagree ● Don't know

2 Identify possible improvements to the existing highway network before assessing if any new roads might be needed?



● Agree ● Disagree ● Don't know

QUESTION 5J

Question 5j asked:

We will be assessing how we can provide access to an expanded London Luton Airport by all modes of transport, with a focus on rail, bus, walking and cycling. Are there any particular initiatives you would like to see implemented to support improved access to the airport by public/sustainable transport?

In total, 450 respondents answered question 5j. We analysed the free text answers to question 5j and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Public transport	Rail (concerns with capacity and networks)	26%
Public transport	Improvements of local buses and their routes	19%
Public transport	Cycling and walking routes	9%
Traffic Modelling	Traffic modelling in local areas	8%
Option preference	No expansion	7%
Public transport	Supportive of DART	7%
Congestion	Concerns about traffic congestion in local roads	6%
Parking	Need for improved parking at airport	6%
Congestion	Issues with traffic congestion on the motorway	4%
Congestion	Concerns about future congestion on local roads	4%

Table showing top ten themes to question 5j

QUESTION 5K

Question 5k asked:

We are assessing a number of locations on the highway network that may require improvement works to support an expanded London Luton Airport. Are there any particular locations you want to make sure we have considered as we develop our proposals?

In total, 405 respondents using the feedback form answered this question.

We analysed the free text answers to question 5k and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Congestion	Concerns about traffic congestion in local roads	28%
Congestion	Issues with traffic congestion on the motorway	14%
Traffic Modelling	Traffic modelling in local areas	12%
Congestion	Concerns about future congestion on local roads	8%
Infrastructure	Need for better infrastructure (roads)	7%
Congestion	Traffic congestion at Junction 10	6%
Option preference	No expansion	6%
Public transport	Rail (concerns with capacity and networks)	5%
Congestion	Concerns about future traffic congestion around the airport/need improvements	4%
Public transport	Improve roads (concerns with road networks and need to improve to support the option)	3%

Table showing top ten themes to question 5k

Combining these with the comments made in letter and email responses, the main issues raised in regard to surface access were as follows:

- There were concerns over the capacity of junctions on the M1, along roads in the vicinity of the airport, with some respondents identifying specific local roads and junctions in their area they were particularly concerned about in terms of traffic congestion including key A roads, Luton Road, the Hitchin area and East Luton. Some respondents considered

that new highway works would be required, including a by-pass for Hitchin, the A6 link to go all the way past Hitchin and an A505 link road.

- In terms of providing access to an expanded London Luton Airport by all modes of transport, with a focus on rail, bus, walking and cycling, some respondents have expressed their concerns that increased public transport mode share would not solve congestion issues. Related to this, a number of respondents noted that

expanding the airport would result in further issues with rail capacity.

- A number of respondents raised a general concern over poor public transport connection with local areas outside of Luton town centre. Comments were made about south of airport communities having low bus usage.
- Furthermore, a number of respondents raised a general concern of congestion on existing roads around the airport, along the M1 and in particular in the airport drop off zone (DOZ). In relation to the DOZ, some respondents have suggested that this should be made free for a short period of time.
- Some respondents noted the issue of rat running via country lanes to the east of the airport and commented that this problem would be exacerbated by the proposals. There were also concerns raised in relation to HGV traffic and the impact on local roads during the construction phase.
- Other issues raised in terms of surface access were concerns regarding high parking charges and dumped cars on nearby residential roads in particular along Hertfordshire roads east of the airport and along Percival Way, Luton.

QUESTION 5L

Air quality

Question 5l asked:

We outline the measures we are considering to manage the effects of expansion on air quality on pages 61 and 62 of the consultation document. Do you have any comments on these or any other air quality measures?

In total, 443 feedback form respondents answered question 5l.

We analysed the free text answers to question 5l and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Air quality	Concerns about pollution	53%
Climate Change	Need to reduce carbon emissions	10%
Air quality	Need for a management plan	9%
Option preference	No expansion	7%
Air quality	Concerns about increased traffic movements effect on pollution	7%
Noise	Concerns about existing flightpaths	4%
Noise	Quieter planes in the future	3%
Congestion	Concern with traffic congestion in local roads	3%
Air quality	Parks (need to improve air quality in parks)	2%
Consultation process	Concern with the questionnaire	2%

Table showing top ten themes to question 5l

Combining this with the responses received via letter and email, the main comments included:

- A number of respondents raised concerns about the potential impact of the expansion on air quality as a result of the increased road traffic and increased aircraft movements respectively leading to increased road vehicle and aircraft emissions.
- Some respondents noted the need to consider the impact at Air Quality Management Areas (AQMAs), including those at Hitchin and in Bedfordshire.
- In relation to air quality monitoring, it was noted that it must be adequate and a number of respondents made suggestions for locations for air pollution monitoring in the wider flightpath areas. A number of responses requested an introduction for binding targets or penalties if air-quality standards were not met.
- Comments were also made regarding lack of detail in the consultation materials in relation to the strategies and management plans for air quality.
- In terms of mitigation measures, respondents' comments included the following: tree planting, electric ground vehicles, fixed electric ground power to stop engine use.

QUESTION 5M

Landscape and visual

Question 5m asked:

We outline the measures we are considering to manage the landscape and visual effects of expansion on pages 63 and 64 of the consultation document. Do you have any comments on these or any other landscape and visual measures?

In total, 343 respondents answered question 5m on the feedback form.

We analysed the free text answers to question 5m and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	13%
Landscape and visual	Suggestions for landscape and visual improvements	10%
Biodiversity	Support for a biodiversity strategy	6%
Wigmore Valley Park	Want to retain the park as it is	6%
Landscape and visual	Concerns about loss of quality land	5%
Landscape and visual	Issues with light pollution	4%
Air quality	Concerns about pollution	3%
Wigmore Valley Park	Concerns about impact on park landscape	2%
Landscape and visual	Impact of construction on landscape	2%
Climate Change	Need to reduce carbon emissions	2%

Table showing top ten themes to question 5m

In addition, comments were received via letter and email. The key comments overall were as follows:

- A number of respondents expressed their concerns about the landscape and visual impact of the proposed airport expansion, noting that proposals would irreversibly damage a valued area of the landscape and would result in the loss of valued biodiversity and tree cover.
- Related to that were more general concerns that the development is likely to have significant adverse effects upon landscape character and visual amenity. One local authority stated that they are particularly concerned regarding the landscape impacts of the north-side development options, proposed earthworks, buildings and replacement parkland.
- It was also noted that due to the airport's prominent position within the landscape, views to the aviation platform and buildings may not be able to be screened effectively. A concern was also raised that proposed airport development may be more prominent in views experienced by users of the park, were the existing public open space re-provided into North Hertfordshire.

QUESTION 5M

Some respondents also noted that airport expansion may increase night-time effects of lighting.

- Concerns were also raised in relation to incursions into the Green Belt and the loss of accessible open countryside, and how LLAL would address the harm and demonstrate exceptional circumstances for any inappropriate development.
- There were a number of comments and concerns raised regarding the impact of the expansion proposals on the Chilterns AONB and the fact that it was not mentioned within consultation materials. Chilterns Conservation Board (CCB) advised that the project should assess the effects airport development on the landscape and visual amenity of the AONB and consider potential effects from over-flying aircraft; and light pollution. CCB also considered that the development would deprive much of the Chilterns AONB of the tranquillity which it should have as a nationally protected area.
- Some of the respondents expressed their concerns about the maturity of any mitigation planting and the time needed for effective screening to establish.

In terms of the landscape and visual impact assessment of the proposed expansion, some respondents, in particular local authorities, commented as follows:

- The assessment should consider the impact of noise and movement in relation to landscape, visual and audible tranquillity and the enjoyment of people using Public Rights of Way (including the Chiltern Way, Chilterns Cycleway and the North Chiltern Trail).
- The cumulative effects should consider any visual and landscape impacts on changes to the local highway network/sustainable transport measures to accommodate increased numbers of people travelling to the airport as well as cumulative effects of the proposed development, development at Century Park and the sites allocated for housing to the east of Luton.
- The landscape and visual assessment should include representative viewpoints from within the surrounding countryside and consider the sensitivity of views from Someries Castle and Luton Hoo. One authority also requested that views from Ivinghoe Beacon also be considered.

- It was also noted that the replacement park will fundamentally change the character of the existing agricultural land, and whether this is an appropriate change that requires assessment.

Respondents also made a number of comments regarding measures to manage the landscape and visual effects of expansion, noting the following:

- There was a comment that landscaping would be key to mitigating the effects of the development and getting buy-in from the surrounding community.
- We should seek to minimise our development ‘footprint’ to retain more of the countryside and maintain as much of the existing vegetation cover as possible.
- One local authority advised that there would be a requirement for off-site enhancement of landscape, green infrastructure and amenity linked to mitigation needs.
- There was a suggestion that Sustainable Drainage System (SuDS) attenuation features could be employed within the setting of the terminal and associated buildings to

create an attractive and interesting landscape setting.

- Other suggested mitigation measures included planting more trees and bushes surrounding the airport, minimising the height of proposed buildings, selecting materials that are less visually prominent, using high quality architecture to make features of buildings, using green roofs or green walls, creating bunds between the new park and the airport perimeter and working with the Luton Creative Forum to introduce public art.
- One of the respondents suggested that phasing of the proposals should allow landscape mitigation measures to mature prior to impacting affected areas.
- One of the local authorities noted that introducing structure planting (e.g. woodland shelterbelts as screens) and large attenuation areas could introduce conflict with birds (i.e. increase risk of bird strike).

Some respondents felt there to be insufficient detail at this stage to form a view on potential landscape or visual mitigation measures and the measures that were included in the consultation material lacked any detail.

QUESTION 5N

Heritage

Question 5n asked:

Heritage impacts are considered on pages 65 to 68 of the consultation document. Do you have any comments on our emerging strategy to preserve, understand and enhance public engagement with the historic environment?

In total, 313 respondents answered question 5n on the feedback form.

We analysed the free text answers to question 5n and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Heritage	Support for the preservation of heritage sites in local areas	21%
Option preference	No expansion	12%
Heritage	Support for plans to show the legacy of heritage sites	5%
Heritage	Review of heritage assets and support to preserve them	4%
Wigmore Valley Park	Want to retain the park as it is	3%
Landscape and visual	Suggestions for landscape and visual improvements	2%
Noise	Concern with existing flightpaths	2%
Biodiversity	Support for a biodiversity strategy	2%
Heritage	Accessibility of heritage sites	1%
Air quality	Concerns about pollution	1%

Table showing top ten themes to question 5n

QUESTION 5N

Combining this with the responses received via letter and email, the main issues raised regarding heritage were:

- Several respondents highlighted the importance of, and the need to preserve, cultural heritage. Designated heritage assets that respondents mentioned as being of specific importance were Someries Castle and Luton Hoo. Some respondents have specifically identified improved access to, and the preservation and interpretation of, Someries Castle.
- A few respondents highlighted the importance of the historic environment in general and that of the aviation history of London Luton Airport in particular and that it should be preserved and made more widely available through displays and/or a visitor centre. One respondent suggested that the heritage of the airport itself, as a Second World War RAF base, should also be considered.
- A number of respondents were concerned that priority would not be given to the conservation of the heritage assets. Several respondents referred to the destruction of historic buildings as being undesirable. One local authority specifically referenced strong concerns over visual impact of built forms/structures on the historic landscape character associated with Luton Hoo and Someries Castle.
- Others were concerned by the impact of noise and visual intrusion of flying planes on their experience of the heritage assets. A number of heritage assets in the wider environment that are already impacted by noise were identified as being sensitive to the results of expansion. These included St Albans, Welwyn Garden City, Hatfield House, Knebworth House, Flamstead village and church and Stockwood Park.
- Several respondents expressed negative views of the cultural heritage and the proposals in the consultation, commenting that heritage has already all been destroyed and doubting that any commitments entered into as part of the project would be met.
- One local authority noted they would like to see an acknowledgement that if internationally or nationally important heritage assets are identified these may be put forward for statutory protection by means of scheduling or listing.
- Some respondents suggested educating visitors about Luton and Bedfordshire heritage and tourism with displays and way pointing at the airport, directed at arriving visitors.

QUESTION 50

Biodiversity

Question 50 asked:

Biodiversity impacts are considered on pages 69 to 71 of the consultation document, including measures we are considering to minimise the impacts of our project on biodiversity, and opportunities we are seeking for enhancement. Do you have any comments on how we should minimise biodiversity impacts, and also where we should be looking to enhance the ecological environment?

In total, 323 respondents answered question 50 on the feedback form. We analysed the free text answers to question 50 and have outlined in the table the top ten themes.

Combining these with comments received via letter and email, the main themes included the following:

- Overall biodiversity was not a key concern for the majority of respondents, with issues such as noise, surface access and landscape impacts taking precedence. However, when asked what the most important considerations were in designing and constructing a replacement public open space (question 5d refers),

‘natural habitats (flora and fauna)’ was ranked the highest.

- Some respondents felt that the loss of habitat and wildlife by building on Wigmore Valley Park would be unacceptable – they said that expansion should be located on the adjacent farmland. Other comments were that rare and valued populations of bat, birds and orchids within the site would be severely impacted, as well as the loss of important mature trees and hedgerows;
- Some expressed a concern that a replacement area of parkland may take years to establish and compensate for such loss.
- A number of respondents were concerned that biodiversity pledges would be forgotten if expansion goes ahead and advocated the need for a serious regimen of inspection and penalties to make sure that no harm is done.
- It was suggested that LLAL should put a greater emphasis on the importance of biodiversity. More in-depth surveys and/or gathering of data from the wider area were proposed to establish the long-term impacts of the development, particularly in relation to birds.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	17%
Biodiversity	Support for a biodiversity strategy	16%
Wigmore Valley Park	Want to retain the park as it is	8%
Landscape and visual	Suggestions for landscape and visual improvements	6%
Climate Change	Need to reduce carbon emissions	4%
Air quality	Concerns about pollution	3%
Wigmore Valley Park	Concerns about the impact on park landscape	2%
Biodiversity	Local projects	2%
Air quality	Protection of wildlife from impact of pollution	2%
Air quality	Need for a management plan	2%

Table showing top ten themes to question 50

- It was also noted that natural environment could be an important buffer for noise and pollution from the airport – for example by virtue of providing more trees (including along roads) and public open spaces.

QUESTION 6

Other comments

Question 6 asked:

Do you have any further comments about our emerging proposals for the expansion of London Luton Airport or about this consultation?

In total, 578 respondents provided written responses to question 6 on the feedback. We analysed the free text answers to question 6 and have outlined in the table the top ten themes that were provided.

Theme	Theme expanded on	Percentage of those that answered the question
Option preference	No expansion	33%
Consultation process	Concern with the questionnaire	13%
Noise	Concern with existing flightpaths	11%
Noise	Concern with future flightpaths	8%
Air quality	Concerns about pollution	8%
Option preference	Support expansion	6%
Benefits	Concerns about unfair distribution of benefits	5%
Climate Change	Need to reduce carbon emissions	3%
Finance	Acknowledgement of the business case/reasons for the project	3%
Consultation process	Felt uninformed about the consultation	3%

Table showing top ten themes to question 6

Our analysis of these, alongside the “unstructured” consultation responses received via letter and email, enabled us to identify six further key issues, additional to those already commented on above.

Opposition to expansion

As outlined earlier in this chapter, a clear issue emerging from the consultation was that some respondents were opposed to expansion of the airport. They typically expressed this view in free-text responses. The reasons given for opposing expansion were generally connected with the environmental impacts of expansion, including noise. Consultees also raised concerns that the current infrastructure would not support further increase in airport capacity based on the current capacity issues with the existing road network.

QUESTION 6

Climate change

The main issues arising from the consultation in relation to climate change were:

- There were concerns regarding the impact of greenhouse gas (GHG) emissions resulting from the scheme on the climate, specifically the impact of increased emissions from flights on the climate and the impact this will have on the UK meeting its legally binding carbon reduction targets.
- The resilience of the scheme to climate change and the impact of the scheme on the resilience of the surrounding environment and community to cope with the impacts of climate change were also noted.
- Some respondents raised the issue regarding the loss of Wigmore Valley Park and the subsequent impact of increased temperatures in combination with increased noise preventing the local community from opening windows to ventilate buildings.
- Stakeholders commented that there was an absence of reference to climate change policy and legislation, including consideration of UK Carbon Budgets (set under the climate Change Act 2008).

Consultation and engagement

The main issues arising about the consultation itself were:

- Views were expressed that the questions were biased and that they assumed support, and did not provide sufficient allowance for the fact that some respondents were against the expansion.
- A number of the respondents were critical of the use of ranking questions in the non-statutory consultation questionnaire.
- Some respondents commented that insufficient information had been provided in the non-statutory consultation materials for them to form a view, and that the information provided was in places factually incorrect.
- Some respondents were of the view that more advertisement was needed for the public consultation events and that more consultation events were required.
- There were also some positive comments about the consultation, noting that it was professional.

On the question on engagement, generally respondents welcomed opportunities to engage in the future development of the airport, although a number of respondents expressed concerns about lack of engagement by the airport in the past.

Health

The consultation did not include specific questions or statements relating to health by which to draw a direct analysis. Therefore, this commentary has been drawn from responses that refer to issues relating to the determinants of health such as noise and air quality.

- Some respondents who were opposed to expansion of the airport citing detrimental effects on health, well-being, quality of life and mental health. This included impacts on Luton and the surrounding areas, villages and more rural parts of Hertfordshire and Bedfordshire. References were made by respondents on the “health hazards” and potential risks posed by the expansion to residents living under the flight path.

- Respondents described concerns about how traffic and associated air quality/pollution and noise would adversely affect their health and quality of life and some respondents commented on impacts on sleep due to night time flights, low flying planes and noise.
- Question 3b prompted the most responses on health, quality of life and wellbeing, with respondents raising various issues including: lack of benefits arising from expansion for those living near the airport and neighbouring areas, and highlighting the tension between the economic benefit and environmental impact of an airport.
- Impacts on green spaces and public open spaces such as Wigmore Valley Park were considered to affect health and wellbeing. This also included private spaces such as gardens in the areas most affected. Respondents raised the issue of impacts on families and children, particularly in relation to impacts on Wigmore Valley Park and other outdoor spaces and gardens.

QUESTION 6

Land and compensation

- A number of respondents raised the issue of compensation both in terms of impact on property value and also seeking compensation measures in respect of noise, air quality and pollution:
 - 36 respondents referred to the topic of compensation and insulation of properties
 - 16 of those were primarily concerned with the insulation of affected properties
 - 10 were concerned about compensation in the value of their property
 - 6 people expressed their dissatisfaction with current noise mitigation measures in terms of insulation and compensation.
- Suggestions were made for noise insulation mitigation measures/ schemes such as triple glazing, wall and roof insulation and air-conditioning (to help with the problem of noise during hot periods when the residents leave their windows open).

- Some respondents made requests to be relocated and others requested more information on compensation and the insulation scheme. One respondent suggested a reduction/ rebate of council tax as a means of compensation to the local community affected by the negative impacts of the proposed expansion.
- There was also a suggestion that the planned new housing in the flightpath area should be fully aware of plans well in advance so that developers can incorporate insulation as part of initial build.

Operations and passenger experience

- Some respondents expressed a preference for the development to the south of the existing runway because they saw the benefits in minimising disruption to the existing terminal operation. There were some concerns about disrupting ongoing operations at the existing terminal which already has a constrained and congested operation. Some respondents were in favour of two terminal north side solution for the same reason.

- In addition, some respondents commented that the level of service at the existing terminal was sub-standard in terms of levels of seating, queueing, bins provided etc. They also raised the issue of lack of boarding bridges. Others made similar requests that a new terminal provide a higher level of service.
- There were also concerns about the effects of current construction works adversely impacting the passenger experience at the airport.





05

OUR RESPONSE TO THE FEEDBACK

A decorative graphic consisting of multiple overlapping, curved white lines that create a sense of depth and movement, resembling a wireframe or a stylized wave. It is positioned at the bottom of the page, extending across the width.

RESPONSE TO KEY THEMES

Once the consultation response data sets were prepared, and the statistical information set out in chapter 4 was available, the multi-disciplinary team of technical specialists met to discuss the responses to the issues raised during the consultation.

We identified the following response themes (listed in alphabetical order).

- **Air quality**
- **Biodiversity**
- **Climate change**
- **Construction impacts**
- **Consultation and stakeholder engagement**
- **Earthworks**
- **Employment and economics**
- **Flightpaths**
- **Green Belt**
- **Health**
- **Heritage**
- **Land and compensation**
- **Landscape and visual**
- **Need and forecasts**
- **Noise**
- **Operations**
- **Opposition to the proposed expansion**
- **Option preference**
- **Replacement parkland**
- **Surface access**

In the following sections of this chapter we set out our responses to the issues raised, structured according to the above themes.

The non-statutory consultation feedback was also considered by the technical teams as part of Sift 3, the third stage of the option sifting process. The technical teams reviewed all of the responses alongside further technical work undertaken since Sift 2 and undertook a “back-check” of the Sift 1 and Sift 2 process to see if the appraisals should change in light of the feedback received and ongoing

technical work. Then, taking into account the consultation feedback and additional information which has become available since Sift 2, the expansion options (including an additional option - see chapter 6 for further details) were appraised to identify a preferred option.

Chapters 6 and 7 of this report explains the Sift 3 process in more detail, and report on the outcome, including our choice of option 1a as the preferred option, and our decision to target 32 mppa for our DCO application.

RESPONSE TO KEY THEMES

1 Air quality

Summary of issues raised	Our response
<p>Air quality was a key consideration in the response to the consultation. The main issues raised by respondents related to the potential impacts on air quality from the proposed expansion including increased aircraft emissions and also increased road traffic leading to increased road vehicle emissions.</p>	<p>Air quality considerations were one of the assessment criteria used in our three-stage options sifting process to identify a preferred expansion option. The feedback received confirmed that we had appropriately identified and considered matters relating to air quality in Sift 1 and Sift 2. The feedback was also taken into account in the Sift 3 appraisal.</p> <p>In terms of developing our preferred option, an air quality assessment will be undertaken as part of the statutory Environmental Impact Assessment (EIA) process. The air quality assessment will be included in an Environmental Statement (ES) which will form part of our DCO application. It will include modelling of the impacts of aircraft emissions on the ground at the airport, and during landing and take-off cycle operations at height. Road traffic data will also be used to investigate the future impacts of the expansion. The traffic data will consider the growth in the region in the future. The assessment will also look beyond these key sources of pollution and consider the emissions from combustion plant located at the airport and the airside support vehicles. The assessment will follow guidance from local and national government and the European Commission. It will also set out any mitigation that is required.</p>
<p>Several queries were raised by respondents regarding the air quality assessment study area, such as whether a respondent's particular area/location will be assessed</p>	<p>The air quality assessment study area is a 15km by 15km grid centred on the airport. This captures the most sensitive receptors and the receptors which will be most impacted by the proposed expansion. Traffic data will be used to assess the air quality for the roads that are predicted to be impacted by the scheme, which will include the access routes to the airport.</p>
<p>Comments were received from respondents regarding air quality monitoring such as:</p> <ul style="list-style-type: none"> • requests for monitoring at specific locations; • the view that there is not enough air quality monitoring or it is not far-reaching enough; and • the view that results of air quality monitoring are not transparent/readily available/published 	<p>Air quality monitoring is currently being undertaken by Luton Borough Council and LLAOL, and an additional survey is underway to inform the DCO application. These surveys provide good coverage around the airport, Luton and at Breachwood Green, which will be the most affected area. Central Bedfordshire Council and North Hertfordshire District Council also undertake their own monitoring which has also been collected to assess the baseline conditions.</p> <p>The coverage is good for the areas that will be most affected. The baseline assessment, which will involve verification using the available monitoring data air quality, will provide predictions of the concentrations at locations that have not been monitored.</p> <p>Currently, the pollutants being monitored include nitrogen dioxide (NO₂) and particulate matter (PM10 and PM2.5). Volatile organic compounds (VOCs) which are compounds related to fuel are also being monitored with passive tubes.</p> <p>A "supersite" is also in procurement for Wigmore Valley Park which will monitor:</p> <ul style="list-style-type: none"> • Nitrogen oxides (NO_x), nitrogen dioxide (NO₂) and nitrogen monoxide (NO); • Total suspended particulate matter (TSP) and fine particulate matter (PM10, PM2.5 and PM1); • Black carbon; • Sulphur dioxide (SO₂); • Carbon monoxide (CO); • Ozone (O₃); • and the VOCs benzene, naphthalene and toluene. <p>This will result in more pollutant species being monitored at LTN than at any other major UK airport. Carbon dioxide is not a direct concern with regards to human health and is not monitored in ambient air, however, CO₂ emissions will be considered in the Climate Change assessment. The monitoring undertaken by local authorities is published in annual reports. The results from the survey undertaken for the air quality assessment, by LLAOL and monitored at the supersite will be included in the DCO application documentation.</p>

RESPONSE TO KEY THEMES

1 Air quality (continued)

Summary of issues raised	Our response
Comments were received which query the impacts at AQMAs.	The air quality assessment that will be undertaken as part of the EIA will include an assessment of the impacts at AQMAs located in Luton, Dunstable and Hitchin.
Concerns were noted by respondents regarding the impacts of emissions from aircraft at height. These concerns were borne out of concern from being below a flight path. Comments were also received that “in flight” operational measures will reduce aircraft emissions.	Impacts from aircraft emissions are generally limited to altitudes up to 1,500ft (457m) above ground level. However, the assessment will include a sensitivity test to investigate the ground level impact from aircraft operations in the altitude range of 1,500-3,000ft (457-914m) above ground level. The impacts will be assessed across the assessment domain and will form part of the EIA air quality assessment The receptors closest to the airport will be the most affected by aircraft emissions.
Concerns were noted regarding the potential air quality impacts at ecological sites such as Wigmore Valley Park and the Chilterns AONB.	As part of the EIA air quality assessment the potential impacts of the proposed expansion on where the public spend time (for example, one hour dog-walking in Wigmore Valley Park) will be assessed for comparison with the relevant air quality objectives. The impacts of emissions at designated ecological sites will also be assessed. The ecological impact at an AONB will only be assessed if it is a designated ecological site.
Construction impact of earthworks and road traffic	An assessment of the construction impacts will be undertaken as part of the EIA. A construction dust assessment will be undertaken which will inform the Construction Environmental Management Plan (or similar document) to minimise the impacts.
Concerns were raised regarding the cumulative impacts on air quality of other proposed developments such as a proposed incinerator, other airports and regional growth.	The cumulative impacts from existing sources will be included in the air quality assessment. The cumulative impact from the proposed incinerator will be considered if it is consented or highly likely to exist in any of the scenario years modelled as part of the air quality assessment. The effect of regional growth will be assessed via the regional traffic model.
Air quality mitigation was raised by some respondents who asked for more details on how the proposed measures will be accomplished, how enforcement of mitigation measures and consequences would be undertaken and how objectives were to be achieved. Additional measures were also suggested.	We are in the process of considering and reviewing appropriate mitigation measures to seek to address potential adverse impacts of the expansion proposals. Any such measures will be assessed for their suitability and monitoring will continue in the future to allow an assessment of the effectiveness of the measures put in place.

RESPONSE TO KEY THEMES

2 Biodiversity

Summary of issues raised	Our response
<p>The main issues raised by respondents in relation to biodiversity were concerns about the potential loss of habitat and wildlife at Wigmore Valley Park, the methods by which survey and data regarding wildlife would be gathered, and how the expansion proposals would impact on future biodiversity.</p>	<p>Natural habitats and biodiversity was one of the assessment criteria considered in our three-stage options sifting process to identify a preferred expansion option. All the consultation responses received regarding natural habitats and biodiversity were reviewed by our technical team. The feedback received confirmed that we had appropriately identified and considered matters relating to biodiversity in Sift 1 and Sift 2. Accordingly there was no change required to the results of that analysis. The consultation feedback on biodiversity was also considered as part of the Sift 3 appraisal to identify a preferred option.</p> <p>Having had regard to concerns raised during the consultation about the impact of the proposals Wigmore Valley Park, we developed a new option 1d. This option accommodates expansion north of the existing runway whilst retaining Wigmore Valley Park. This option was appraised as part of Sift 3 alongside the existing Sift 2 options, but did not ultimately emerge as our preferred option (see further chapters 6 and 7).</p> <p>For the species surveys that have been and will be undertaken the methods have been agreed with local council ecologists from Luton Borough Council, Central Bedfordshire and Hertfordshire, as well as being agreed in principle with Natural England. Along with informing the option selection process the results of these surveys will also inform the EIA and will therefore identify suitable mitigation and enhancement measures to replace any habitats lost.</p> <p>In terms of developing our preferred option a biodiversity strategy will be prepared to identify habitat and species management measures to ensure long-term biodiversity gains and enhanced connectivity within the area. This will take on board the feedback from this consultation exercise and be prepared in consultation with local groups/organisations through ongoing stakeholder engagement meetings and will incorporate suggestions of habitat translocation, species re-introductions and school initiatives wherever possible.</p>

RESPONSE TO KEY THEMES

3 Climate change

Summary of issues raised	Our response
<p>The main issues raised by respondents regarding climate change were related to the potential increased climate change impacts of aviation, and to a lesser degree surface access journeys, on carbon emissions.</p>	<p>Climate change and carbon emission considerations were both criteria used in our three-stage options sifting process to identify a preferred expansion option.</p> <p>All the consultation responses received regarding climate change and carbon emissions were reviewed and considered by our technical team. The feedback received confirmed that we had appropriately identified and considered matters relating to climate change in Sift 1 and Sift 2. Accordingly, there was no change required to the results of that analysis. The consultation feedback on climate change and carbon emissions was also considered as part of the Sift 3 appraisal to identify a preferred option.</p> <p>We will be developing a Surface Access Travel Plan as part of the DCO application that will seek to encourage a shift to lower carbon travel to the airport. The travel plan will be developed to identify how, as part of the airport expansion, the necessary infrastructure will be implemented to encourage the use of public transport by passengers and staff rather than the use of private cars. A new mass passenger transit system is currently being built to provide a link between the existing railway station and the airport terminal and this will be extended as required. Discussions are in place with the train operating companies to increase the number of trains stopping at the airport.</p> <p>A Construction Environmental Management Plan (or similar document) will be developed to manage carbon emissions from construction activities.</p>
<p>Several respondents referenced the impact of increased emissions from flights on the climate and the impact this will have on the UK meeting its legally binding carbon reduction targets. Stakeholders commented that there was an absence of reference to climate change policy and legislation, as well as the consideration of UK Carbon Budgets (set under the Climate Change Act 2008).</p>	<p>The UK has made legally binding commitments to reduce carbon emissions through the Climate Change Act (2008). We understand the aviation sector has a key role to play if these are to be achieved. To understand the GHG impact of the proposed airport expansion, an assessment of GHG emissions resulting from construction and future operations will be undertaken as part of the EIA. Along with emissions arising directly from on-site airport operations, this assessment will also consider emissions from the surface access journeys made by passengers and staff. The assessment will identify opportunities to mitigate GHG emissions during construction and operation of the airport, for example potential low carbon energy generation and design, the provision of public transport and promotion of low carbon fuel vehicles and opportunities to reduce emissions from aircraft operation during the landing take-off cycle.</p> <p>The outputs from the GHG emissions assessment will be used to identify any impact the proposed expansion may have on the UK Government's ability to achieve its legally binding carbon reduction targets and identify key mitigation measures to reduce GHGs. It will also identify the contribution LTN will make to overall UK aviation sector emissions. When assessing the impact of the airport expansion, consideration will be given to the UK Government's new Aviation Strategy expected in 2019. The aviation industry is working to seek opportunities to reduce aviation emissions through the introduction of new aircraft technologies and lower carbon fuels.</p>

RESPONSE TO KEY THEMES

4 Consultation and stakeholder engagement

Summary of issues raised	Our response
<p>The main issues raised in relation to the consultation process were views that: the questions asked were biased; dislike of the ranking questions; that insufficient information had been provided in the booklets/brochures; that more advertisement was needed for the public consultation events; and that more consultation events were required.</p> <p>There were also some positive comments, such as the consultation was professionally run.</p>	<p>We have considered all the comments received on the consultation while we review our strategy and approach to drafting the documents for the next consultation exercise. Statutory consultation is planned to take place later this year and we are considering the inclusion of possibly more event venues (in light of the feedback regarding flightpaths) and more advertisements of the events ahead of the start of the statutory consultation. We will also be listing and including more document inspection venues.</p> <p>We signalled our plans expand the airport in our 2017 Vision document. The 2018 consultation was focussed on the options for doing so, and the impacts that should be taken into account when developing proposals. We designed the feedback form so that the public could provide comments and information that will assist us in developing our expansion proposals for LTN. The questionnaire also included space for further comments, to allow consultees to provide feedback that was not covered in the preceding questions. All of the feedback received has been carefully considered.</p> <p>We are reviewing the types of questions we will ask at the statutory consultation to ensure that all questions are clear to ensure that there is a consistent approach in recording answers on the questionnaire when responding to the questions raised.</p> <p>We have noted the requests for more detail. More detailed work will be undertaken ahead of the statutory consultation and this will form the basis of the statutory consultation documents.</p> <p>We are also reviewing the digital strategy to ensure that website-related concerns with the questionnaire are not repeated during statutory consultation.</p>
<p>We received numerous responses from organisations welcoming engagement and offering to take part in engagement in the future.</p>	<p>We recognise the legal requirements placed on promoters by the Planning Act 2008 to consult on their applications, as well as the practical need for a robust pre-application period of consultation and ongoing engagement, and have set up strategies to achieve this. We are looking at the requests of technical organisations to engage with us and will accommodate these as far as possible. Our statutory consultation is planned for later this year and will be another opportunity for engagement.</p>

5 Construction impacts

Summary of issues raised	Our response
<p>Responses were received from respondents raising concerns about the various possible impacts from construction activities that might arise as a result of the proposed expansion.</p>	<p>Construction impacts would be managed and controlled via a Construction Environment Management Plan (CEMP), or similar document. The purpose of a CEMP is to set a framework to control possible impacts arising from the construction of the scheme. The CEMP will cover environmental, public health and safety aspects of the scheme that may affect the interests of local residents, businesses, the general public and the surroundings in the vicinity of the scheme. The control measures set out in the CEMP will be based on the findings and mitigation measures set out in the Environmental Statement prepared following consultation with stakeholders. A CEMP (or similar document) commonly applies to all works authorised by the DCO and undertaken by the appointed Contractor(s). The Contractor(s) will also comply with all legislation relating to the construction activities.</p>

RESPONSE TO KEY THEMES

6 Earthworks

Summary of issues raised	Our response
<p>The majority of the comments from respondents had an appreciation of the major scale of earthworks required to support the creation of the platform and therefore the significant impact on the existing character of the landscape resulting from the preferred proposals. As a consequence, a number of respondents sought clarity or further detail on the proposed earthworks solution, particularly the associated remediation and mitigation of Wigmore Valley Park. That there was insufficient detail relating to the impact on the existing topography caused by the enabling works was a recurring theme and many of the responses identified a number of concerns which should be addressed in the landform design.</p>	<p>The feasibility of earthworks was one of the assessment criteria used in our three-stage options sifting process to identify a preferred expansion option.</p> <p>All the consultation responses received regarding earthworks were reviewed by our technical team. The feedback received confirmed that we had appropriately identified and considered matters relating to earthworks in Sift 1 and Sift 2. The consultation feedback on earthworks was also considered as part of the Sift 3 appraisal to identify a preferred option.</p>
<p>Respondents raised concerns regarding the proposed earthworks to be undertaken around the landfill site, it being perceived as dangerous.</p>	<p>The environmental impacts of working with landfill are typical considerations made by our technical team in the preparation and assessment of any earthworks proposals and led to our intention to minimise any use of, or disturbance to, the landfill site. In terms of developing our preferred option, detailed ground investigation has been undertaken to understand the nature of the waste.</p> <p>It should be highlighted that there are a number of embedded engineering solutions to minimising risk to human receptors when working adjacent to former landfill sites although these will be determined through detailed design at a later stage.</p>
<p>Some respondents highlighted the need to consider construction impacts whilst assessing the earthworks proposals, e.g. construction compounds, night-time working, percussive piling.</p>	<p>Although the consultation document made it clear that details of the construction phasing and building works will be considered during the next phase, and will be included in our next consultation, there is a clear opportunity to engage further with and receive feedback from stakeholders which we plan to undertake as our proposals develop.</p>

RESPONSE TO KEY THEMES

7 Employment and economics

Summary of issues raised	Our response
<p>Responses to the consultation queried the economic benefits and increased job opportunities arising from the proposed expansion.</p>	<p>The ability to deliver economic benefits nationally and regionally and increase job opportunities were assessment criteria used in our three-stage options sifting process to identify a preferred expansion option. All the consultation responses received regarding employment and economics were reviewed by our technical team. We concluded that the matters raised during consultation had already been appropriately considered in Sift 1 and Sift 2, and accordingly there was no change required to the results of that analysis. . The consultation feedback regarding employment and economics was also considered as part of the Sift 3 appraisal to identify a preferred option.</p>
<p>A number of respondents queried the estimate of 800 jobs per mppa created by the development citing that this level of employment generation had not been achieved by LTN in the past.</p>	<p>The estimate of an increase of 800 jobs per mppa was presented as an initial estimate of the employment impact within the three counties region and represented potential growth in total jobs supported by the airport within this area over the current levels of employment supported. This included direct on-site employment as well as an initial estimate of supply (indirect) and induced employment impacts. Some respondents appear to have assumed that the figure related to direct on-site employment only.</p> <p>More detailed assessment work is underway in relation to the economic benefits that would arise from the development and how these would be distributed over the local area. This work will be outlined in the next phase of consultation, planned for later this year.</p>
<p>Some respondents commented that the benefits arising from the growth of the airport are unevenly distributed.</p> <p>In particular, respondents' comments that most of the benefits as perceived as being realised in Luton whilst areas in Hertfordshire, in particular, suffered the disbenefits in terms of noise and traffic.</p> <p>Respondents suggested that more could be done to share the benefits arising from the proposals and several organisational respondents asked for further dialogue on the actions that could be taken to ensure that the benefits are spread over a wider area.</p>	<p>We have carefully considered these views and we are planning to put forward proposals for how the benefits of expansion can be spread over a wider area as part of the statutory consultation, planned for later this year.</p>

RESPONSE TO KEY THEMES

7 Employment and economics (continued)

Summary of issues raised	Our response
<p>Several respondents expressed concern regarding the impact of the growth of LTN on the tourism expenditure overseas, contributing to a balance of payments deficit.</p>	<p>The question of a tourism deficit is not normally addressed at the individual airport level as this is a national issue and limiting growth at LTN would not necessarily result in fewer UK residents travelling abroad. In any event, the ability to travel abroad is more often seen as a 'social good' and the Government does not have any policy which seeks to restrict overseas travel in order to improve the balance of payments.</p> <p>The effect of any tourism deficit is also not included within WebTAG (the recognised appraisal methodology). In any event, it is virtually impossible to identify the net economic impact as it is not possible to be certain how much of this income would be retained in the UK, i.e. it might simply be used to purchase imported goods in any event.</p> <p>More detailed assessment work is underway in relation to the economic benefits that would arise from the development. This work will take into account tourism effects as far as it is reasonable to do so.</p>
<p>Some respondents raised the impact of development on house prices, both positive in terms of pressure of demand on supply and negative in terms of the effect of the airport growing on property values in the areas affected by noise.</p>	<p>Quantifying the impact of development on house prices is very difficult. Experience would suggest that the impact of airport development on house prices can be both positive and negative in the long run.</p> <p>To the extent that there are demonstrable effects on house prices arising from the development these will be assessed in line with statutory provisions for compensation more generally.</p>
<p>Some respondents suggested that the 'polluter pays' principle should be imposed on passengers using the airport and that this would impact on the demand levels and on the extent of economic benefits to be realised by the development.</p>	<p>The costs of any required environmental mitigation, to be identified within the environmental assessment work, will be paid for by the airport operator and, hence, passed to airlines and their passengers. The assessment of the business case for the development has included an allowance for reasonable mitigation costs and this does not undermine the economic case for expansion. If consented, the development will be consistent with the polluter pays principle.</p>

RESPONSE TO KEY THEMES

8 Green Belt

Summary of issues raised	Our response
<p>Concerns were raised in letters received from stakeholders regarding the potential expansion into the green belt. Concerns related to potential incursion of development in the green belt, the loss of accessible open countryside, how LLAL would seek to address the harm as well as demonstrate exceptional circumstances for inappropriate development.</p>	<p>Our sift appraisals identified that the options capable of supporting 36-38 mppa could have a potential impact on the neighbouring Green Belt, notably to accommodate the earthworks and to host some comparatively minor associated development. The design development process had therefore sought, from the outset, to seek to minimise the impact of the airport expansion on designated Green Belt and land within North Hertfordshire,</p> <p>The sift criteria assessed the expansion options based on conformity with national and local town planning policies and the capability of attracting the consents required. As such options were assessed in relation to compliance with national planning policy, including policy regarding the Green Belt. Options which were in broad conformity with national policy and which limited the extent of any inappropriate development within the Green Belt (options 1a, 1b and 1c) scored more positively than those which required more significant development in the Green Belt (options 2, 3a, 3b and 3c).</p> <p>As reported in chapter 6 below, we have now decided to focus the DCO application on a target of 32 mppa. Accordingly the potential impacts on the Green Belt of options 1a, 1b and 1c are substantially reduced due to the reduced scale of the DCO proposal.</p>

9 Health

Summary of issues raised	Our response
<p>The main issues that respondents raised regarding health related to concerns for well-being resulting from noise and air quality impacts of the development proposals. In addition concerns were noted about the loss of public open space and the ability to attract new jobs to the area.</p>	<p>We have considered all the responses relating to health in detail. The sift appraisal incorporated consideration of access to employment and training opportunities, as well as impacts on residential amenity, which are also considered important factors in determining levels of health in the local communities. The appraisal also made the assumption that each option would be delivered in line with employment strategies to maximise the benefits and to ensure the benefits reach relevant groups.</p> <p>The Environmental Statement will include a chapter on health covering the impacts and effects on human and population health. Further responses from technical health and well-being experts will be considered as part of the assessment.</p> <p>The assessment will be an evidenced-based approach drawing from other topics within the Environmental Statement, for example, noise, air quality and transport assessments to ensure a comprehensive health assessment is undertaken as part of the process.</p>
<p>A specific response to the consultation was received from Public Health England, who requested that the health and community assessment considers including the human health effects of electromagnetic fields in its assessment</p>	<p>We welcome Public Health England's engagement in the proposals. The proposed airport expansion will not generate any electromagnetic fields to assess and therefore this will be scoped out from the assessment.</p>

RESPONSE TO KEY THEMES

9 Health (continued)

Summary of issues raised	Our response
<p>A small number of respondents made specific reference to the dumping of fuel by aircraft. Of the responses on the subject, some suggest that fuel dumping happens often and there is concern about the environmental and health impacts.</p>	<p>Fuel dumping from an aircraft is the practice of jettisoning fuel rapidly from special dump vents on the wings of the aircraft. Fuel dumping systems are only found on larger wide body aircraft that are designed with a maximum landing weight considerably less than its maximum take-off weight. For these aircraft, landing too heavy can cause structural damage to the aircraft. In these larger aircraft, fuel dumping is only carried out if aircraft have an emergency situation shortly after take-off and need to lower their weight rapidly before landing. These situations are coordinated with Air Traffic Control to minimise any dumping at a height whereby the fuel has not evaporated before landing on the ground.</p> <p>As the large majority of aircraft operating out of LTN are small commercial and business jets that do not have fuel jettison systems, it is believed that the reports of fuel dumping are being made mistakenly. LTN has some capability to cater for a small number of larger aircraft such as the Airbus A330 and Boeing 767 of the current types but, as LTN has a relatively short runway, these aircraft are unlikely to operate at or near their max take-off weight and as such would not need to dump fuel if they needed to land shortly after take-off.</p>

10 Heritage

Summary of issues raised	Our response
<p>The main issues raised by respondents highlighted the setting and preservation of heritage assets, such as Someries Castle and Luton Hoo, as important considerations in the selection of the preferred option. The comments indicated that priority should be given to the conservation of heritage assets, including against noise and visual intrusion of flying planes as well as any enhancement of heritage assets including provision of better access.</p>	<p>Heritage considerations were one of the assessment criteria used in our three-stage options sifting process to identify a preferred expansion option. All the consultation responses received regarding heritage were reviewed by our technical team. We concluded that the matters raised during consultation had been appropriately considered in Sift 1 and Sift 2, and so there was no change required to the results of that analysis. The consultation feedback on heritage was also considered as part of the Sift 3 appraisal to identify a preferred option.</p> <p>We recognise the importance of heritage conservation. Cultural heritage will be considered as part of the EIA process, and this will incorporate consideration of consultation responses. Detailed assessments of the impact of the proposal on the heritage assets and details on mitigation measures where they are necessary will be provided. LLAL will also identify enhancement opportunities.</p> <p>Once baseline noise data is available the potential impact on the setting of heritage assets across the wider area will be assessed, with particular focus on the assets and areas mentioned by the respondents.</p>

RESPONSE TO KEY THEMES

11 Land and compensation

Summary of issues raised	Our response
<p>The main issues raised under this theme concerned the insulation of the affected properties, and compensation in the value of properties affected by the proposals. Some people expressed their dissatisfaction with current available noise mitigation measures.</p>	<p>We have carefully considered respondents comments and concerns regarding compensation measures, including noise insulation.</p> <p>The airport operator, LLAOL, has in place a Noise Insulation Scheme as one of the measures involved in reducing noise for local communities. The scheme was implemented for non-residential noise sensitive buildings in 2013 and for residential buildings since 2014.</p> <p>Together with an Independent Noise analyst and London Luton Airport Consultative Committee Noise Insulation Sub-Committee, LLAOL offer insulation to eligible properties from a pot of £100,000 available each year. Depending on any existing insulation in the property, double glazing, secondary glazing and ventilation units can be provided.</p> <p>We are in the process of considering and reviewing appropriate compensation and mitigation measures to seek to address potential adverse impact of the expansion proposals. Further details will become available as the proposals progress. We plan to include this as part of our proposed statutory consultation later this year</p>

12 Landscape and visual

Summary of issues raised	Our response
<p>Respondents highlighted various concerns about landscape and visual impacts of the proposed expansion, including: significant loss of visual amenity in a valued landscape, with the expanded airport more prominent; loss of valued biodiversity and tree cover; and impacts on the Chilterns AONB.</p> <p>Consultees made proposals about the assessments that should be undertaken to understand landscape and visual impacts, and various suggestions in terms of measures to mitigate the impacts, such as maximising retained vegetation, on-site and off-site environmental enhancements, and designing the scheme to minimise intrusion.</p>	<p>Landscape and visual considerations were one of the assessment criteria used in our three-stage options sifting process to identify a preferred expansion option. The main issues that were raised in the consultation feedback had already been taken into account in Sift 1 and Sift 2, though some additional elements such as the tranquillity of the ANOB were added. This did not, however, affect the overall appraisal ratings. The consultation feedback on landscape and visual issues was also considered as part of the Sift 3 appraisal to identify a preferred option.</p> <p>Most of the proposals suggested in consultation responses are consistent with best practice and are accordingly planned to be needed to support the Landscape and Visual Impacts Assessment (LVIA) for our DCO application.</p> <p>The feedback suggests however that:</p> <ul style="list-style-type: none"> • The project may benefit from our involving, to a greater extent, local representatives in the planning of landscape and visual mitigation, landform and identification of long-term amenity enhancements both on and off-site; and • Consideration should be given to improving the arrival experience and mitigating the landscape and visual effects of the existing airport development, alongside effects resulting from the expansion proposals. <p>The feedback also recognises the importance of landscape management for mitigation and the need to ensure that long-term funding is put in place for managing landscape mitigation and enhancement measures both on and off-site.</p> <p>Further work will be undertaken as part of the LVIA to understand the landscape and visual effects of consequential developments (e.g. distant road junction improvements), once these are better understood.</p> <p>It will also be necessary to consider within the LVIA effects on more distant receptors (e.g. people walking, cycling, riding or volunteering in the Chilterns AONB) and include Ivinghoe Beacon as a viewpoint location.</p>

RESPONSE TO KEY THEMES

13 Need and forecasts

Summary of issues raised	Our response
There were concerns raised by some respondents that the airspace simply cannot accommodate the levels of movements required for the development.	<p>As discussed further under the “Noise” theme at 14 below, NATS has embarked on the Future Airspace Strategy Implementation (FASI) South exercise which is committed to ensuring that the airspace is adequate to support anticipated growth across all of London’s airports, including Heathrow’s third runway and anticipated growth at the other airports, including LTN.</p> <p>It is important to note the level of change in aircraft movements related to LTN required to be accommodated in any given hour. This is expected to increase from 37 to 50 in the peak hours.</p>
A number of respondents raised concerns about the safety of increasing the number of aircraft movements at LTN. Specific issues include the ability to achieve 50 movements per hour from a single runway without extending the runway. Concerns about the safety of some aircraft using LTN was also queried.	<p>Simulation modelling has been used to assess the capacity of LTN’s runway to handle 50 movements per hour. This shows that this level of hourly movements is achievable without undue delays and congestion so long as sufficient taxiway and apron infrastructure is provided. This is taken into account in the options for development being considered.</p> <p>The demand forecasts take into account the range of aircraft types that can operate both safely and with a commercial payload from LTN’s existing runway length.</p> <p>All airlines operating to the UK are required to adhere to international safety standards, currently determined by European Union Aviation Safety Agency (EASA).</p>
It was suggested that further capacity could be made available by displacing business aviation away from the airport and using that space for other activities so as to reduce overall development.	<p>We will consider the space currently used for other activities in our scheme design, although the space currently occupied by business aviation activities may not lend itself to constructive use for larger aircraft and wider passenger operations.</p> <p>Business aviation operations are of high value to the economy as a whole and this will be a factor in our consideration of the extent to which such operations should be accommodated in future</p>
A number of respondents expressed the view that the demand forecasts were over optimistic. Specific issues raised were in relation to the DfT’s national aviation forecasts, the impact of Brexit and the relationship between growth at LTN and the expansion planned at other London airports.	<p>The forecasts presented at the non-statutory consultation were based on the DfT’s October 2017 UK aviation forecasts. A number of respondents sought to compare the expected growth of LTN up to best use of its single runway, expected to be reached in the early 2040s, with the specific DfT forecasts for 2025. This is misleading as LTN would not be expected to reach full capacity until 15 or more years later.</p> <p>These and other respondents queried the need for expansion at LTN in the light of growth plans at other airports. Expected growth at both Heathrow (third runway), as supported in the Airports National Policy Statement (NPS), and Stansted (to 43 mppa) has been allowed for in the forecasts presented. The growth plans of other airports are necessarily less certain at this stage. DfT forecasts show all the London airports approaching their aircraft movement capacity over the period 2030-2040. LTN itself is shown as reaching capacity between 2020 and 2025 unless further expansion is allowed. This provides the context for the policy support for all airports being able to realise the best use of their existing runway capacity alongside the development of a third runway at Heathrow.</p> <p>Other respondents also highlighted the uncertain effects of Brexit on future air travel growth. This uncertainty is acknowledged. The demand forecasts will be updated, taking into account the effects of Brexit and any changes to the plans of other airports prior to our statutory consultation.</p>

RESPONSE TO KEY THEMES

13 Need and forecasts (continued)

Summary of issues raised	Our response
Some respondents saw growth at LTN as an opportunity to provide a wider range of air services and destinations available locally.	The demand projections for LTN indicate that, over the medium term, there will be sufficient demand to support a wider range of destinations being served, including the East Coast of the USA and the Middle East as well as a wider range of European destinations, including business cities. Newer generation aircraft such as the B787 and A350 have the capability of serving these more distant points from LTN's existing runway provided that terminal and apron infrastructure is upgraded.
It was highlighted that as the average aircraft size at LTN is smaller than some other airports, then more movements will be needed to handle the throughput.	It is correct that airports that have a larger component of long haul services have a greater use of larger aircraft. Long haul services and short haul services are not in the main substitutable, except where a passenger may use a short haul hub to connect to a long haul flight. In terms of comparable short haul operations, the fleet mix at LTN is comparable or even larger in aircraft size/passenger load terms on average than that seen at other airports for their short haul services. The implications of the future fleet mix will be fully assessed in the EIA and reported in the ES

14 Noise

Summary of issues raised	Our response
<p>Noise was a key issue raised during the consultation. Responses focused on: the impact of any increases in aircraft movements resulting in increased noise; flightpaths and flight times, notably night flights; the impact of future aircraft technology; and proposed noise insulation schemes. Comments were also received concerning road traffic noise and other noise generated by airport operations.</p> <p>Respondents also commented on current levels of noise, the LLAOL Noise Action Plan and current noise monitoring and the noise envelope, notwithstanding any expansion.</p>	<p>Noise considerations were one of the assessment criteria used in our three-stage options sifting process to identify a preferred expansion option. We concluded that matters raised during consultation had already been appropriately considered in Sift 1 and Sift 2, and so there was no change required to the results of that analysis. The consultation feedback on noise was also considered as part of the Sift 3 appraisal to identify a preferred option.</p> <p>In addition to consideration of the feedback for the sift process, the consultation feedback will help inform an assessment of potential noise and vibration impacts due to the proposed expansion of LTN, that will be carried out as part of the EIA.</p> <p>The following information (raised in the consultation) will be included in the noise and vibration assessment (in line with the Airports NPS):</p> <ul style="list-style-type: none"> • A description of the noise sources; • An assessment of the likely significant effect of predicted changes in the noise environment on any noise sensitive premises (including schools and hospitals) and noise sensitive areas (including National Parks and AONBs); • The characteristics of the existing noise environment, including noise from aircraft, using noise exposure maps, and from surface transport and ground operations associated with the project, the latter during both the construction and operational phases of the project; • A prediction on how the noise environment will change with the proposed project; and • Measures to be employed in mitigating the effects of noise. <p>The scope and methodology for assessing potential noise and vibration impacts will be defined in the EIA Scoping Report, which is expected to be published later in 2019. The main focus of the assessment will cover aircraft noise, as it is the most prominent source of noise associated with the project; however, the assessment will also address the potential noise and vibration impacts due to construction activities, ground noise impacts from aircraft taxiing and associated activities and the potential noise impacts due to changes in road traffic flows.</p>

RESPONSE TO KEY THEMES

14 Noise (continued)

Summary of issues raised	Our response
	<p>The results of a preliminary noise impact assessment will be set out in the Preliminary Environmental Impact Report (PEIR) which will be published later in 2019 as part of our statutory consultation exercise.</p> <p>Should any significant impacts be identified in this assessment, mitigation measures will be developed in order to avoid those effects in accordance with Government policy. Good acoustic design will be integrated into the proposed development wherever practicable to minimise ground noise emissions.</p> <p>A CEMP, or similar document, will be devised and adopted which will set out the measures that will be used during the construction phase to minimise noise and vibration emissions. This will include how best practicable means will be adopted to manage the potential noise and vibration impact. The plan would apply to both on-site works and HGV movements on the local road network.</p> <p>Should any significant adverse noise impacts due to changes in air noise be identified, measures will be defined for avoiding those significant adverse effects as required by Government policy. It is expected that such measures would follow the principles of the International Civil Aviation Organization's Balanced Approach to Aircraft Noise Management. The measures could include, but are not limited to:</p> <ul style="list-style-type: none"> • Using incentives for airlines to adopt quieter aircraft; • Adopting operational procedures that reduce the noise impact; • Exploring the provision of respite; and • The further development of a noise insulation scheme for noise sensitive premises. <p>In addition, we will actively engage with the process of redesigning the airspace around LTN so that this opportunity is taken to mitigate and minimise further the noise impact, where possible.</p> <p>From the consultation responses we recognise that for those who responded to the consultation, noise generated by aircraft movements at night is the main adverse noise impact. The consultation materials stated the ambition to retain the existing limit of 9,650 annual aircraft movements during the night quota period (23:30-06:00). Assuming it is possible to maintain this existing limit, without unduly disrupting the optimal operation of an expanded airport, other measures will be explored for mitigating and minimising the noise impact in the night quota period. This could include a ban on the use of noisier types of aircraft and/or having periods during the night when no aircraft movements would be scheduled to occur.</p> <p>LLAL has committed to put forward plans for a Noise Envelope. At present, there is some general uncertainty over exactly what should constitute a noise envelope. However, the Airports NPS the design of a noise envelope should be defined in consultation with local communities and relevant stakeholders. To that end, as previously mentioned in our non-statutory consultation document, we are planning to set up a Noise Envelope Design Group, comprising representatives of various stakeholders. It is anticipated that the group would have an independent chair.</p> <p>Throughout the assessment process, our focus will be on demonstrating that the following aims are met for the effective management and control of noise, within the context of Government policy on sustainable development:</p> <ul style="list-style-type: none"> • Avoid significant adverse impacts on health and quality of life from noise; • Mitigate and minimise adverse impacts on health and quality of life from noise; and • Where possible, contribute to improvements to health and quality of life.

RESPONSE TO KEY THEMES

14 Noise (continued)

Summary of issues raised	Our response
<p>Concerns were raised regarding airspace, flightpaths and subsequent noise.</p>	<p>We recognise that airspace and its impact on noise is a significant issue to be addressed. Work is ongoing to redesign the airspace over London, as part of which the aim is to remove the current constraints that each airport imposes on the others as well as to provide sufficient airspace capacity to accommodate future growth in air transport, including Heathrow's third runway. This programme is known as FASI South and the work is being led by National Air Traffic Services (NATS) under the supervision of the DfT and the Civil Aviation Authority (CAA). It is a collaborative process, involving all of the London airports. NATS is responsible for airspace redesign above 7,000ft and, in due course, each airport will need to promote its own airspace change programme for the routes below 7,000ft. It is expected that this process will create opportunities for many of the concerns about flightpaths to be addressed in the future.</p> <p>The actual process for airspace change will need to follow the process outlined in the CAA's Civil Aviation Publication 1616, which will include full consultation as well as the consideration of the environmental effects, including International Civil Aviation Organization (ICAO) and WHO guidance. Whilst the current operator may promote short term changes to flightpaths under this process, it is expected that the longer term changes to flightpaths consequential on the DCO would be subject to a separate process following the granting of the DCO. Further details of the process to be followed will be made clear as part of the statutory consultation.</p> <p>Many of the suggestions for changes to the flightpaths and operations are part of a wider Noise Action Plan that will be developed as part of our expansion plans. This will focus on commercial and operational factors which may mitigate against aircraft noise, and will consider issues around a perceived inadequacy of the current noise insulation scheme.</p> <p>Noise modelling, which will need to be undertaken as part of the EIA, will be a key feature of understanding the future impacts to allow airspace design and noise action planning to be developed to maximise the mitigation measures.</p>
<p>There were 15 mentions of helicopter flying in the consultation responses. There were varying levels of impact described by respondents, from occasional noise through to them being very frequent. This relates to noise generated by these aircraft. A suggestion was made to re-route helicopters over major roads such as the M1 rather than residential areas. A further suggestion was to ensure helicopters flew at a higher level.</p>	<p>We recognise that helicopters are individually noisy and need to be factored into the noise modelling. However, the number of helicopter movements to/from LTN is very small – around 600 a year. LLAL believes that a number of people in the area are experiencing issues with overflying helicopters which are not directly related to or under the control of LTN. Many helicopters follow landmarks such as major roads and railways as part of their navigation around the country and this may explain why respondents are experiencing disturbance from such operations.</p>
<p>There was a concern that any increase in movements during the day would need to be matched pro-rata by an increase in night movements. There were views that the 9,650 limit is a percentage of permitted day time flights and, therefore, could need to increase.</p>	<p>The current limit is an absolute number of flights and is accompanied by a noise quota, limiting the extent to which noisier aircraft can operate. The noise quota at LTN is less than at many other airports, such as Stansted, Birmingham or Manchester. These airports do not operate with noise curfews but we recognise that one has been offered by Heathrow should the 3rd runway be developed. We will give further consideration to this issue and it may be necessary to consider how the movement limit is deployed for best noise mitigation and economic gain.</p>

RESPONSE TO KEY THEMES

14 Noise (continued)

Summary of issues raised	Our response
<p>There were concerns that the proposals would bring larger aircraft with slower climb rates, thus imposing greater noise on communities over which they fly. There was also general concern that larger aircraft are noisier.</p> <p>There were some respondents who welcomed larger aircraft to allow a greater range of flying from the Airport.</p>	<p>There may be a mistaken perception about larger aircraft, which in reality can climb at equal or better rates than smaller aircraft. To the extent that our demand forecasts include a small element of flying by new generation larger aircraft such as the B787 or A350, the implications of their operations will be taken into account in the modelling of noise impacts to be carried out for the EIA.</p>
<p>Comments were made about private jets being noisy and these movements taking place in the early mornings and at night. There was also a suggestion that the majority of current aircraft movements were by such aircraft.</p>	<p>The impacts of business aviation will be included in any noise modelling and constraints or mitigations considered. This may also include consideration of periods of the day or night when limits may be applied to business aviation activity. It should be noted that private jets make up only around 20% of total aircraft movements.</p>
<p>In addition to the broader comments above regarding noise, cargo aircraft were identified as being particularly noisy due to their age. It was also highlighted that the times of these movements during the night often leads to residents being woken because they are single events when there are few other aircraft operations at these times.</p> <p>Solutions suggested ranged from outright bans of cargo aircraft at night through to greater restrictions on how noisy such aircraft can be.</p>	<p>The impacts of cargo flying will be included in any noise modelling and constraints or mitigations considered. This may also include consideration of periods of the day or night when limits may be applied to cargo flights.</p>
<p>The view held by some respondents was that any benefits arising from new technologies in aircraft will be offset by increases in the total number of movements.</p>	<p>We recognise that this concern has arisen because growth in the short term has outstripped the pace at which new generation aircraft have been introduced into the fleet at LTN. We will give further consideration to how to achieve greater certainty as to the rate of change in the future.</p> <p>Consideration of this will need to form part of the noise modelling work to inform the EIA. We will need to consider how future aircraft technologies may change further and how they may relate to LTN</p>

RESPONSE TO KEY THEMES

15 Operations and passenger experience

Summary of issues raised	Our response
<p>A number of respondents made comments on the existing quality of service and congestion experienced in the existing terminal. In relation to the operational effectiveness of the options considered, respondents commented on the potential for greater efficiency with a large single-terminal solution, although other respondents expressed a preference for two smaller terminals. There were some concerns that splitting traffic across the two terminals could result in passenger confusion when navigating the expanded airport.</p>	<p>Operational effectiveness was one of the assessment criteria used in our three-stage options sifting process to identify a preferred expansion option. All the consultation responses received regarding operational effectiveness were reviewed by our technical team and used to undertake a back-check of the Sift 1 and Sift 2 process to see if any of the assessments should change in light of the feedback.</p> <p>The consultation highlighted that a greater emphasis should be placed on the passenger experience sub-criterion when appraising each of the options. As a result, the appraisal conducted during Sift 2 was back-checked accordingly and the appraisals under this criterion adjusted. This adjustment did not lead to a change in the ranking of the options within the Sift 2 analysis. The consultation feedback on operational effectiveness was also considered as part of the Sift 3 appraisal to identify a preferred option.</p> <p>These comments reinforce the preference for a two terminal solution as any solution that aims to expand the existing terminal will undoubtedly have more of an impact on the operation of the existing terminal and wider airport than secondary terminal options. Any impact from construction on the existing operation would always aim to be minimised as far as possible whatever the format of an expansion is. However, by constructing a new terminal at a distance from the existing one, it will be much easier to mitigate any disruption.</p> <p>We have listened to the comments about the frustration and dissatisfaction about people's experience of using the existing terminal and airport facilities and will be sharing them with the airport operator. In expanding the capacity of the airport, it will be far easier to provide a higher level of service by building a new separate terminal. In doing so, we anticipate that the existing terminal will be subject to further refurbishment in the medium to long term with the aim of improving the levels of service for the passenger. This again will be easier to do after the new separate terminal has opened.</p> <p>In a new terminal, we will look to provide good levels of service throughout the passenger journey, both inbound and outbound. This would be evident in an improved amount of space per passenger in check-in, security, departures areas and boarding gates for outbound passengers and for inbound passengers in passport control, baggage reclaim and customs control. Appropriate levels of seating across the terminal will be provided, with acceptable ratios of general public seating and commercial seating in food and beverage outlets. Along with this, the requisite numbers of bins, toilets and electronic device charging areas will be provided.</p> <p>Further improvements to the airfield are also anticipated that will further enhance the passenger experience in terms of minimising the possibilities of delays.</p>

RESPONSE TO KEY THEMES

16 Opposed to expansion of the airport

Summary of issues raised	Our response
<p>Some respondents considered that LTN should not be expanding and disagreed with our proposals.</p>	<p>The importance to the UK economy of having sufficient airport capacity is made clear in the Airports NPS published in June 2018. Accompanying the NPS, the Government published: Beyond the horizon The future of UK aviation - Making best use of existing runways. This latter document sets out Government support for the principle of airports being able to make best use of their existing runways, subject to each case being considered on its merits in terms of the balance of benefits and impacts.</p> <p>We consider that there are substantial economic benefits from expanding LTN to make best use of its existing runway. These will be realised in terms of local employment, wider economic benefits by encouraging investment by others and in terms of benefits to consumers through being able to avail of a wider range of air services available from their local airport. We understand that some people are opposed to expansion, and have had regard to the responses received on this point and the reasons for that opposition, However, we remain of the view that expansion of the airport is the right strategy.</p> <p>It is recognised that the consultation did not contain a detailed assessment of the environmental impacts of the development. This work is underway and a full assessment of our preferred option, taking into account feedback from this consultation, will now be undertaken. A PEIR will be published as part of our statutory consultation next year and consultees will be able to comment on the information set out.</p> <p>Ultimately, the decision as to whether the development can proceed will be taken by the Secretary of State for Transport on a recommendation from the Planning Inspectorate, taking into account the balance between the benefits and impacts, including environmental impacts, of the development.</p>

RESPONSE TO KEY THEMES

17 Option preference

Summary of issues raised	Our response
<p>Whilst the majority of respondents who commented on the options for expansion favoured expansion on the north-side of the existing runway, some respondents expressed a preference for expansion on the south-side. Reasons given for expansion on the south-side included a desire to retain Wigmore Valley Park, the opportunity to design an efficient modern terminal with its own surface access, or a desire to safeguard expansion in the longer term.</p> <p>Feedback was also received on options to enhance the existing runway, including realignment, extension or building a second runway.</p>	<p>In terms of the feedback regarding a second runway, current Government Aviation Policy is not to support the construction of any new runways, other than at Heathrow, at airports serving the London area before at least 2030 and subject to a further review of policy in the light of the need for additional capacity at that time.</p> <p>Notwithstanding this, the current demand forecasts at LTN to the 2040s do not show sufficient demand to warrant a second runway within that timeframe so development would be premature and difficult to justify, particular given that any second runway would have to be located in the Green Belt.</p> <p>Realigning or repositioning of the runway was considered at Sift 1. Since government aviation policy encourages airports to make best use of their existing runways, it is clear that realigning or repositioning a runway does not accord with that policy.</p> <p>In any event, any realignment or repositioning would involve some part of the new runway being constructed in Green Belt, which would be difficult to justify given that the existing runway is sufficient to enable projected demand to be handled.</p> <p>We recognise that realigning or repositioning the runway could reduce noise in some locations but would introduce new noise to locations not currently affected. The balance of benefits on noise grounds alone is not clear.</p> <p>The option to site a terminal to the south of the runway was considered in Sift stages 1, 2 and 3. None of the advantages of developing to the south were considered to outweigh the difficulty of developing in the Green Belt, particularly when there is land available to the north of the runway for development and which is recognised as being available for airport use in local policy. There are also potential operational challenges with having a second terminal to the south of the runway as this would require vehicles and aircraft to cross a live runway.</p> <p>We have listened to feedback regarding Wigmore Valley Park and, following consultation, a further north-side option was developed which would avoid this. Further details can be found in the next section of this chapter below, and in chapter 6.</p>
<p>Some respondents suggested moving cargo facilities closer to the M1.</p>	<p>We considered this option as part of scheme development, however it would be technically difficult due to land ownership and also to meet the operational requirements of any operators. It would not reduce the amount of cargo flying.</p>

RESPONSE TO KEY THEMES

18 Replacement parkland

Summary of issues raised	Our response
<p>Concerns were raised by respondents regarding the impacts on Wigmore Valley Park.</p>	<p>Having listened to concerns about the loss of Wigmore Valley Park, we revisited the options to see if there was an option which would avoid the need to take land from the park. This resulted in a new option, option 1d, which would be a two terminal solution to the north of the runway, but with the new second terminal moved further east to avoid Wigmore Valley Park. This option is shown in chapter 6, below. It has been subject to the same “sifting” analysis that was conducted in respect of options considered in Sift 2. The outcome of this exercise was that option 1d performed poorly against the sift criteria when compared to the other four options. Hence this option is not viable. Please refer to chapter 6 below, and the Sift 3 report, for more information on the assessment of this new option 1d.</p>
<p>Various suggestions were made about the parkland design process and proposed layout of parkland.</p>	<p>We have carefully reviewed the comments made by stakeholders and the public regarding the north-side solutions and the suggested impact that this may have on Wigmore Valley Park. We recognise that people have concerns about our proposals and are keen to address these where possible. We welcome also the various suggestions that people have put forward about what their priorities would be for a replacement area of public open space and will give these consideration as we move forward with our proposals.</p> <p>We understand from the feedback that a replacement parkland should be appropriate to the character of the surrounding landscape and that it needs to be close to and easily accessible from the communities it serves. The feedback makes clear that there needs to be a focus on establishing natural habitats (i.e. flora and fauna) and that a replacement parkland should be given opportunity to establish and mature, to some extent, prior to it being used by the public. Park facilities, sports and recreation facilities and play areas are important considerations in a replacement parkland and, whilst of lesser overall importance, any replacement public open space should also seek to minimise views to the airport, include surfaced and accessible paths, and connect to the wider footpath network.</p>

RESPONSE TO KEY THEMES

19 Surface access

Summary of issues raised	Our response
<p>Concern regarding the potential impacts of expansion on the surrounding highway network was a key theme for respondents to the consultation.</p>	<p>Whilst our assessment is that the runway is capable of handling up to 38 mppa, we recognise that the ability to achieve this capacity is substantially influenced by the ability to accommodate the increased demand placed on the highway network.</p> <p>We acknowledge that this was a significant issue mentioned throughout the non-statutory consultation. Further technical work has therefore been aimed at understanding the surface access issues arising out of airport expansion.</p> <p>Although an airport capable of handling 36-38 mppa remains as the ultimate vision for the best use of the existing runway, our ongoing assessments have indicated that the scale of highway capacity enhancements required to achieve 38 mppa would be beyond the scope of the current project.</p> <p>Accordingly we have identified that the appropriate target for the DCO application at this stage is 32 mppa. This proposal is now undergoing further development and assessment, including detailed traffic modelling.</p> <p>Otherwise the majority of surface access issues raised by the public as part of the consultation had already been factored into the Sift 1 and 2 appraisals, and as such the identified concerns had been acknowledged as needing to be addressed as part of any airport expansion proposals.</p> <p>In many cases the issues raised would be largely relevant to any of the expansion options appraised. However in some instances, such as concerns over public transport connectivity to Luton town centre, the options which sought to provide a terminal to the north of the runway would enable the issues expressed to be addressed more readily and this was reflected in the appraisal of the options.</p>
<p>Respondents raised the issue of road congestion on the following:</p> <ul style="list-style-type: none"> • on the M1 motorway including Junction 10; • in the Hitchin area; • in the roads around Luton Airport. 	<p>We are assessing the highway network in the vicinity of the airport and wider afield using traffic models agreed with relevant key highway authority stakeholders. We are aware of congestion issues related to J10 and although we are not in a position to provide solutions that will result in a congestion free network we are ensuring that our mitigated solutions will not add significantly to levels of congestion predicted without airport expansion. We have been engaging with Highways England as we advance our modelling work further.</p>
<p>Respondents raised the issue of road congestion around the airport Drop Off Zone (DOZ).</p>	<p>The performance of the current DOZ area is the responsibility of the airport operator; however, we will take into account future mitigation measures where appropriate as part of the application for expansion.</p>
<p>Some respondents raised the issue that even without airport expansion the area is highly congested.</p>	<p>We will mitigate the highway network to a degree that airport expansion traffic will not significantly affect the network when compared with the without airport expansion base case. We are not expected to resolve all congestion issues as most are not airport related but we will assess the degree of increase resulting from our proposals and the significance of this in order to develop our mitigation measures.</p>

RESPONSE TO KEY THEMES

19 Surface access (continued)

Summary of issues raised	Our response
<p>Some respondents raised the issue that some motorists using the airport use residential side streets or any unintended short cuts (rat running). In particular respondents noted this:</p> <ul style="list-style-type: none"> • along Hertfordshire roads east of the airport; and • along Percival Way. 	<p>We have reviewed these responses and will assess any potential rat running routes and, as appropriate, explore potential mitigation in consultation with the relevant highway authorities.</p> <p>In relation to Percival Way we are already aware that this is an issue and will include it in our modelling and address as appropriate within our strategy and proposed mitigation.</p>
<p>The following issues were raised in regard to parking:</p> <ul style="list-style-type: none"> • Charges for airport car parking are high; • Airport users park cars on adjoining roads; • More passengers at the airport will entail more displacement of parking; • The DOZ should be free for a short period; • There are issues with the offsite parking sites. 	<p>We have reviewed the responses regarding current car park charges but this is LLAOL's sole responsibility, as airport operator at the current time.</p> <p>A part of any future parking strategy will be to consider what appropriate levels of charging may be introduced.</p> <p>In relation to cars being parked on adjoining roads and the potential for this problem to increase in the absence of any other mitigation measures, we will assess the magnitude of the problem and consider appropriate measures to be consulted upon with residents by Luton Borough Council.</p> <p>The charging policy for the DOZ is a matter for the airport operator.</p> <p>Off-site parking will not form part of our DCO application and issues related to such sites should be dealt with through the local authorities' planning enforcement powers.</p>
<p>Some respondents considered that the following new highway works would be required such as:</p> <ul style="list-style-type: none"> • A by-pass for Hitchin • The A6 link to go all the way past Hitchin • An A505 link Road 	<p>These proposals have no status in planning policy terms, and will not form part of our DCO application. As outlined above, our decision to target a 32 mppa DCO application reflects the fact that certain highway capacity enhancements are beyond the scope of this project .</p>
<p>Respondents noted issues with the following roads:</p> <ul style="list-style-type: none"> • M1 Motorway • Key A roads • Hitchin Area • Luton Road Area • East Luton 	<p>As part of our modelling we will identify junctions that will need to be modified and we will propose potential improvements at these locations as appropriate.</p>

RESPONSE TO KEY THEMES

19 Surface access (continued)

Summary of issues raised	Our response
Respondents raised concerns regarding HGVs and general congestion.	We will develop a strategy that will in due course be used to obtain agreement with local highway authorities to address HGV traffic along designated routes.
Respondents highlighted south of airport communities with low bus usage.	It is recognised that not all areas can be serviced by public transport due to low volumes of demand but we will assess potential solutions as part of our wider public transport strategy.
Respondents raised that expanding the airport would result in further issues with rail capacity.	We will be discussing rail capacity as part of our consultations with operators and the DfT and we will include further information on our strategy as part of our statutory consultation later this year.
Some respondents commented that increasing modal share of public transport is challenging and will in their view still not solve congestion issues	We will work to deliver a higher level of public transport that will provide acceptable levels of network operation. However it should be acknowledged that our work will not resolve all congestion problems – our obligation is to not significantly increase it. Thus appropriate mitigation will be developed and proposed in the next stage of project development.





06

POST-CONSULTATION
ASSESSMENT OF OPTIONS &
PREFERRED OPTION

OUR ASSESSMENT

As outlined in chapter 2, to explore the options for making best use of the runway, we undertook a three stage options appraisal process we called 'sifting'. Sift 1 and Sift 2, described in chapter 2, resulted in the short list of options which we consulted on.

These are described fully in the Sift 1 and Sift 2 reports. Sift 3 took into account consultation feedback and additional technical information which has become available since Sift 2 in order to review the previous sifts to ensure they remained valid, and undertake a final sift to identify a preferred option.

Sift 3 marks the completion of the sift process and going forward our preferred option will be developed further and will form the subject of our statutory consultation. This chapter outlines how the Sift 3 process arrived at our preferred option.

Development of a new option for consideration

One of the themes which emerged in comments by stakeholders and the public regarding the options proposed for the north-side of the existing runway was the impact on Wigmore Valley Park.

In response to these concerns a new option was therefore developed as part of the 'northern' option family, which accommodates expansion north of the existing runway whilst retaining Wigmore Valley Park. This was called option 1d.

Option 1d (shown opposite) includes a new terminal and apron capacity east of Wigmore Valley Park, resulting in two terminals north of the runway, retaining the existing terminal and avoiding development within Wigmore Valley Park.

As well as the development of the terminal building, the option covers the concurrent development of the airfield infrastructure, the associated surface access enhancement into the airport, the necessary enabling works and extension to the mass transit system.

By avoiding Wigmore Valley Park, the option pushes the development further east, beyond our current land ownership and into the Green Belt.

As part of Sift 3 this option was considered alongside the other short-listed options. The outcome of the Sift 3 appraisal, including option 1d, is summarised below.

OPTION 1D



MOVING TOWARDS 32 MPPA DCO PROPOSAL

Since Sift 2, further technical work has been ongoing on a range of issues, including addressing the surface access challenges arising out of airport expansion. This work has involved:

- a significant number of traffic related surveys (volume, direction, speed, journey time etc.) on the highway network surrounding the airport; and
- initial surface access modelling work to further understand the projected demand on the road network, alongside a study of potential junction improvements.

The effect of airport expansion on the road network was also a significant factor raised in consultation.

Greater understanding of this effect, arising from the further technical work outlined above, led to a reconsideration of the scale of our proposed DCO application. Although an airport capable of handling 36-38 mppa remains our ultimate vision for the best use of the existing runway, the scale of highway capacity enhancement required is beyond the scope of the current

project. As a result, we identified that the appropriate target for the DCO application is 32 mppa. This proposal is now undergoing further development and assessment, including detailed traffic modelling.

Reducing the airport's proposed capacity to 32 mppa also has a number of beneficial effects on the potential impacts of the scheme, most notably reducing the need for development within the Green Belt, noting the planning protections over this land and the concerns expressed by some consultees about encroachment of the expanded airport into the countryside.

This decision required a revision of the short-listed options so that a 32 mppa version could be appraised as part of Sift 3. Details of these revised options can be found in chapter 2 of the Sift 3 report.

Sift methodology

The methodology for Sift 3 is set out in detail in chapter 3 of the Sift 3 report. In summary, a range of technical experts considered both the consultation feedback and further technical work to:

- 'back-check' Sifts 1 and 2 to confirm the findings of these appraisals

Appraisal Level	Scoring
Large Beneficial	20
Moderate Beneficial	10
Slight Beneficial	5
Neutral	0
Slight Adverse	-5
Moderate Adverse	-10
Large Adverse	-20
Currently Unworkable	-20

Table showing appraisal levels

remained valid having regard to the consultation feedback and additional technical work undertaken since Sift 2;

- re-appraise the short-listed options as well as the new option 1d with the aim of identifying a preferred option;
- reappraise the short-listed options as well as the new option 1d following the decision to scale back our DCO application to 32 mppa.

The same eight level evaluation system (see the table above) was used for Sift 3 as for Sift 2, and each option was appraised against the same 28 criteria covering issues such as compliance with government policy, environmental impacts, economic benefits, quality of life for local residents, surface access issues,

efficiency and viability. The criteria used in Sift 3 are set out in Appendix C of the Sift 3 Report and refinements to those criteria since Sift 2 are explained in section 3.5 of that Report. As with Sift 2, options were scored using the following appraisal levels and scoring was based on professional judgement and the best information available at the time of appraisal.

MOVING TOWARDS 32 MPPA DCO PROPOSAL

Taking into account consultation feedback

In order to appraise each option against each sift criterion a technical lead was given responsibility for each sift criterion and as part of their appraisal was asked to review the responses made by consultees in relation to their particular area of expertise, consider whether these impacted on their appraisal in either Sift 1 or 2, and to take those comments into account in Sift 3.

An overview of the key consultation issues raised in relation to each criterion and an explanation of whether or not these comments impacted on the sift score or the criterion itself in each case is contained in Appendix A of the Sift 3 report.

Because the sift process was aimed at appraising options and arriving at a preferred option, issues raised which applied equally across all options did not necessarily affect option selection and so did not impact on the outcomes of the sift process. However, these issues will be considered and addressed in the development of the identified preferred option.

Back check of Sift 2 and refinement of criteria for Sift 3

The back checking of Sifts 1 and 2 did not result in any changes to the overall outcomes of those sift processes. Sections 4.3 and 4.4 of the Sift 3 Report provide further details. However, consultation feedback did result in a re-scoring of the options at Sift 2 under criterion 'S23: Operational Effectiveness'.

Passenger experience, particularly the current passenger experience, was highlighted as an important consideration through the consultation and, whilst this was taken into account in Sift 2, we agreed that this was a priority for airport users and airline operators. Therefore the relative weight of the sub-criterion relating to passenger was increased and this was reflected in the awarded appraisal level.

This resulted in the appraisal level of option 1b being reduced from Large Beneficial to Moderate Beneficial, reflecting the impact to passenger experience of disruption to existing terminal operations before there is sufficient space to move operations into new terminal areas, though this did not alter the overall conclusions of Sift 2.

Criterion S23 was also modified for Sift 3 to ensure appropriate weight was given to passenger experience.

MOVING TOWARDS 32 MPPA DCO PROPOSAL

Outcomes of Sift 3

The detailed results of the Sift 3 appraisal on the basis of a capacity of 36-38 mppa, and the now proposed capacity of 32 mppa can be found in Chapter 5 and Appendices A and B of the Sift 3 report. Overall, the outcomes of Sift 3 reinforced the conclusions of Sift 2, i.e. that option 1a is the clear preferred option. The table opposite ranks the options from most preferred to least preferred, to show the relative distribution of appraisal levels for each option.

As can be seen, option 1d performed poorly and was considered to be currently unworkable as it places significant infrastructure in the green belt. In addition option 1d scored 'large adverse' for noise impact due to close proximity of ground activities to Eaton Green Road, and landscape and visual impact due to the large area of landscape and agricultural land affected. Due to its internal layout option 1d also performed more poorly than other options in relation to operational efficiency and resilience, and was more difficult to phase to meet demand. Of all five options considered at Sift 3, taking on board changes made from

consultation, additional technical work and back-checking during the finalisation of Sifts 1 and 2, option 1a remains the preferred option and performed the strongest against the majority of the sift criteria, based on all available information. This option performed the most strongly in relation to strategic fit, economic benefits, deliverability (within the context of the current concession, attractiveness to future concessionaires and not requiring additional land beyond our current holdings), requiring additional land beyond our current holdings), operational viability and cost benefit. This option is shown on the next page.

The other four options – 1b, 1c, 1d and 2 – are therefore being discontinued. In particular, options 1d and 2 are considered unworkable on the grounds that they do not conform with national and local town planning policies and are therefore not capable of attracting the consents required, since each option proposes significant development in the Green Belt. Both of the single terminal options, 1b and 1c, performed less well than 1a in overall terms.

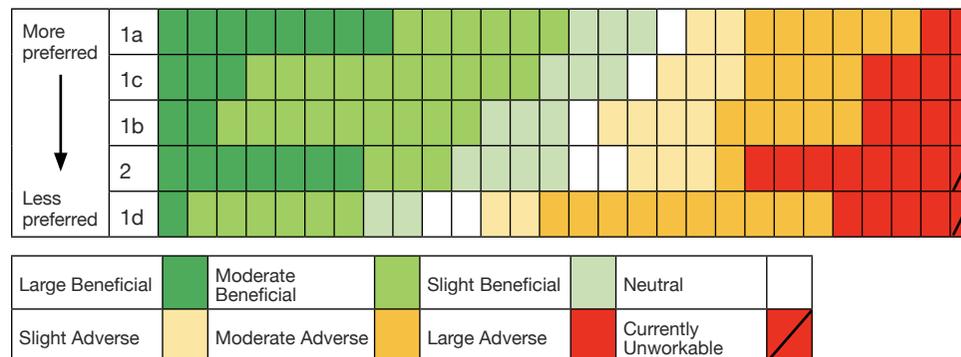


Table showing frequency of appraisal levels for each 32 mppa option at Sift 3

Whilst they were considered capable of delivering some degree of beneficial impacts in relation to strategic fit, economic, social, deliverability, operational viability and cost benefits, they also delivered Large Adverse impacts in relation to surface access and landfill criteria compared to other options.

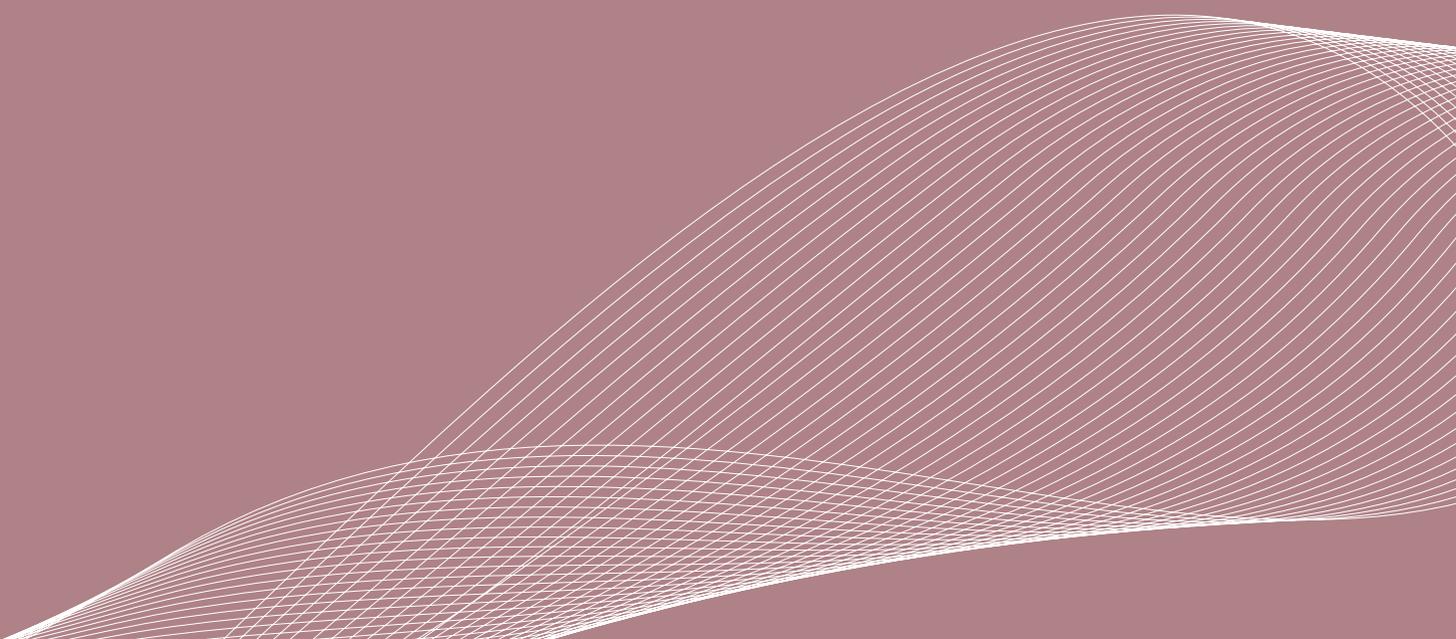
OPTION 1A OUR PREFERRED OPTION





07

SUMMARY & NEXT STEPS



SUMMARY & NEXT STEPS

Summary

As outlined in chapter 2, Sift 1 and 2 allowed us to identify a short list of options which we consulted on in summer 2018.

From our analysis and sifting of the options at that stage, we identified that option 1a was our emerging preferred option before we commenced the consultation, and at the consultation we outlined the reasons for this. Our feedback form asked a series of questions to find out whether the wider public and stakeholders agreed that this was the best choice for expansion. The answers to this series of questions suggest that, of the proposals presented, our preferred option did have the backing of respondents when compared to the other possible routes for expansion.

As discussed in chapter 6, we have also continued to assess the technical implications of the various options, particularly in respect of issues such as the ability to deliver surface access capacity, as well as taking account of the feedback to the consultation exercise.

This further technical work also fed into the Sift 3 process and as a result we have decided to move forward with a modified version of option 1a for our DCO application, which would deliver growth up to 32 mppa.

This preferred option is now being developed which will form the basis of our statutory consultation, planned for autumn 2019. That will be a consultation on the scheme we are proposing to take forward into a DCO application. The consultation will be supported by a range of technical detail, including a PEIR which will explain the likely impacts of the scheme across a range of environmental topics. In order to prepare for the statutory consultation, we will shortly be applying to the Planning Inspectorate for an opinion on the scope of the matters to be considered in our environmental impacts assessment (known as a “scoping opinion”).

Next steps

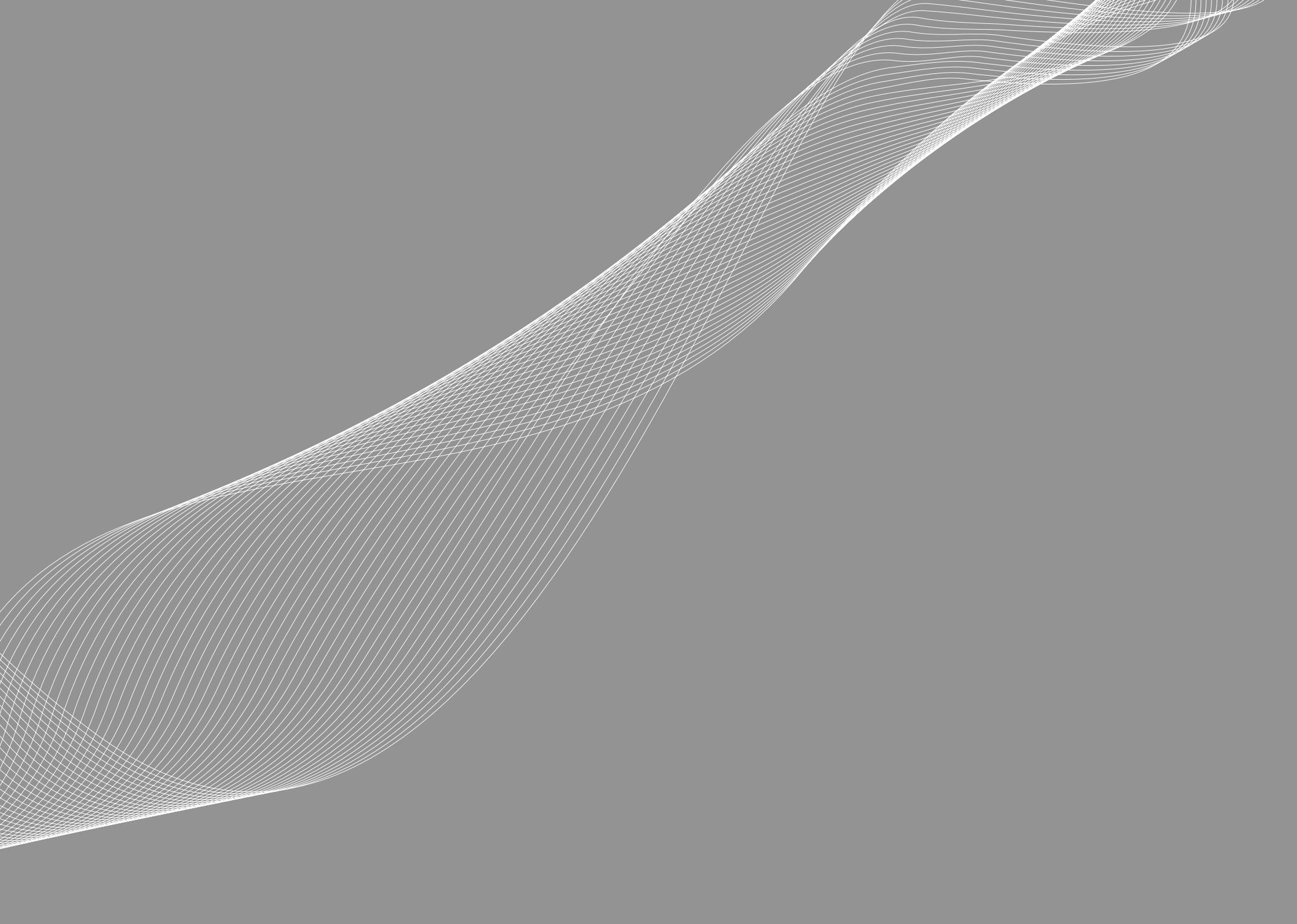
An initial draft of the proposed development (based on preferred option 1a) is shown opposite. This is at an early stage and it should be emphasised that it is subject to further change as part of the development and assessment process, and further consultation and engagement, outlined above.

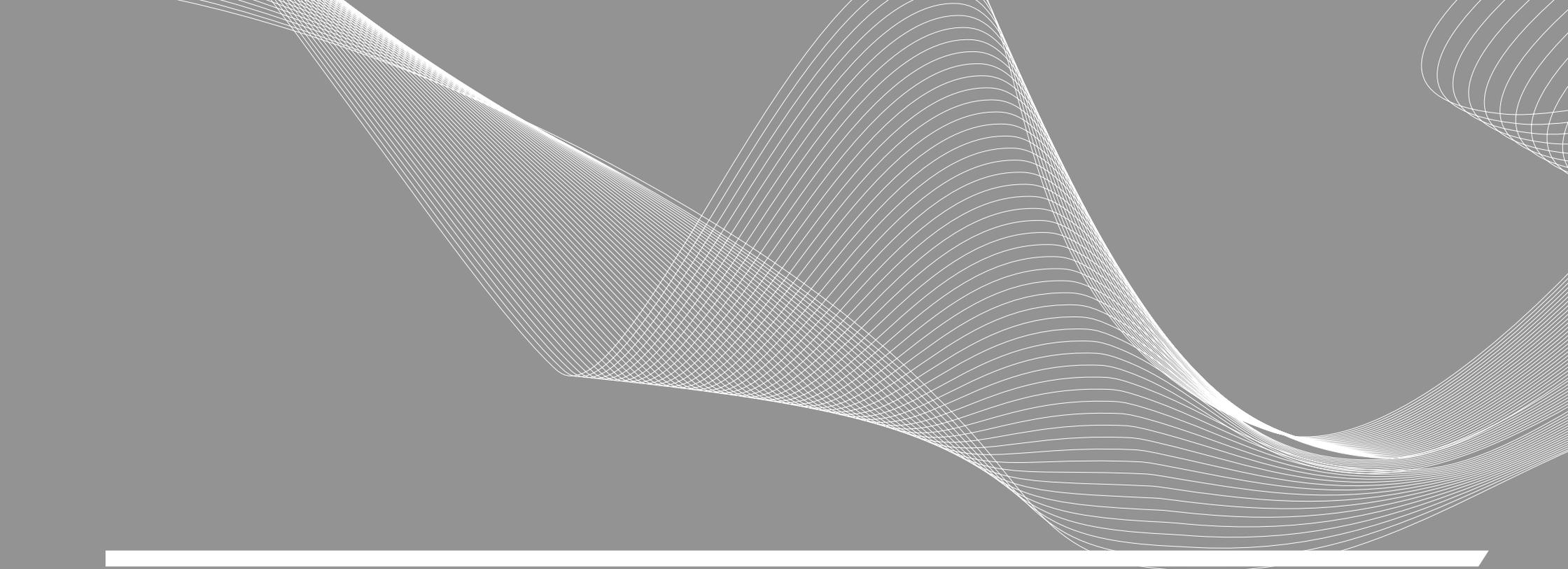
As part of this, we are developing a scheme called “FIRST”, the FutureLuToN Impact Reduction Scheme for the Three Counties. This comprises a range of measures under three main themes, comprising improvements to access, initiatives to support communities, and initiatives to support the environment. We will present the proposals as part of our statutory consultation.

We will continue to keep stakeholders and those that register for more information on our website updated as we progress our plans and move towards statutory consultation. We look forward to further engagement as we develop our plans for the future expansion of London Luton Airport.

We are very grateful for the feedback we have received to date, which has helped us to identify a preferred option to take forward. We have also received a wealth of useful information about the support for, and understandable concerns related to, airport development, and how these concerns might be addressed.

As indicated in our response to the various consultation themes earlier in this report, we are having close regard to this feedback as we develop and assess the impacts of our preferred option, and identify proposals to manage and mitigate those impacts.





APPENDICES

APPENDIX 1: CONSULTATION FEEDBACK FORM

This consultation seeks your views on our proposed strategic approach to expanding London Luton Airport and the initial draft masterplan options.

You can read all about our emerging proposals at www.futureluton.llal.org.uk and respond to this consultation online or you can return your completed form to one of the exhibitions or post to FREEPOST FUTURE LUTON LLAL (no stamp is required).

Your feedback is important to us. All feedback must be received by **5pm on Friday 31 August 2018** to ensure your comments are considered.

Please be assured that your personal details will be kept confidential when reporting the results. If you would like to read about how we keep your data safe, please go to: <https://www.luton.gov.uk/privacy-cookies/>

Should you require any further information about our expansion proposals, or advice on how you can submit your feedback, or to request copies of the documents, you can email futureluton@llal.org.uk or write to us using the FREEPOST address.

Instructions for completing this form

- It is important to refer to the consultation document when completing this form
- The page references within this form will help you find relevant information more easily
- You can leave blank any questions that are not relevant to you

1 Let's get started

Q1a Are you responding...? (Please tick one box)

- As an individual On behalf of an organisation or group

APPENDIX 1: CONSULTATION FEEDBACK FORM

Q1b If you are responding on behalf of an organisation or a group...?

Which organisation/group do you represent

In what capacity are you responding

2 You and London Luton Airport

Q2a Please tell us if you... (Please tick all that apply)

- Work at London Luton Airport Have used London Luton Airport in the last two years

Q2b Please tell us if you are currently affected by the operations of London Luton Airport

APPENDIX 1: CONSULTATION FEEDBACK FORM

3 Future LuToN – the benefits of expansion

Please see Chapter 3 of our consultation document (pages 17 to 25), where we outline the benefits that we believe will arise locally, regionally and nationally as a result of our proposals to expand London Luton Airport.

Q3a To allow us to understand your priorities with regard to the potential benefits of the expansion proposals, how important are the following to you?

Please rank the following in order from 1 to 7, where 1 is the least important and 7 is the most important to you:
(Please tick one box per row and one box per column)

	1 least important	2	3	4	5	6	7 most important
Ability to attract new jobs and economic growth into the area	<input type="radio"/>						
Ability to support key local services through Luton Council	<input type="radio"/>						
Ability to support important charitable and voluntary organisation services through the LLAL Community Fund in areas impacted by airport operations	<input type="radio"/>						
Locally-convenient air travel to a greater range of destinations	<input type="radio"/>						
Ability to support growth of the UK economy	<input type="radio"/>						
Ability to contribute to meeting the increasing national demand for air travel	<input type="radio"/>						
Ability to maintain competitive charges for airlines and customers	<input type="radio"/>						

APPENDIX 1: CONSULTATION FEEDBACK FORM

Q3b Are there any other benefits you think we should be prioritising from the expansion of London Luton Airport?

4 Considering the options to expand the airport

Please see Chapter 4 of our consultation document, where we explain how we have used a structured process and criteria to assess our strategic priorities and to sift through options for London Luton Airport's expansion so that, from a long list, a shortlist of options and an emerging preferred option have been identified.

Q4a Do you agree that our expansion strategy to make best use of the existing runway is more appropriate than pursuing an extended, realigned or second runway (see further pages 28 to 30 of the consultation document)? (Please tick one box)

Agree

Disagree

Don't know

Please tell us more about the reasons for your answer to Q4a.

APPENDIX 1: CONSULTATION FEEDBACK FORM

Q4b We think that development to the north side of the runway is the most appropriate solution for making best use of the existing runway at London Luton Airport. Our proposal is therefore to focus on options to the north of the runway, and to discontinue the southern option at this stage (see further pages 31 to 47 of the consultation document). Do you agree? (Please tick one box)

Agree Disagree Don't know

Please tell us more about the reasons for your answer to Q4b.

Q4c If development is taken forward to the north side of the runway, we think a two-terminal solution is the most appropriate solution (see further pages 46 and 47 of the consultation document). Do you agree?
(Please tick one box)

Agree Disagree Don't know

Please tell us more about the reasons for your answer to Q4c.

APPENDIX 1: CONSULTATION FEEDBACK FORM

5 Managing the impacts of expansion

Key impacts

We would like to understand what you consider would be the key impacts of expansion that we will need to minimise and mitigate. See Chapter 5 (pages 49 to 73) of the consultation document, which describes these impacts and how we propose to deal with them.

Q5a We have identified the following key impacts which we consider to be particularly important in the context of expanding London Luton Airport. Please rank these in order from 1 to 10, where 1 is the least important and 10 is the most important to you: (Please tick one box per row and one box per column)

	1 least important	2	3	4	5	6	7	8	9	10 most important
Enabling works (e.g. earthworks and replacement public open space)	<input type="radio"/>									
Noise	<input type="radio"/>									
Flightpaths	<input type="radio"/>									
Surface access	<input type="radio"/>									
Air quality	<input type="radio"/>									

APPENDIX 1: CONSULTATION FEEDBACK FORM

Table continued

	1 least important	2	3	4	5	6	7	8	9	10 most important
Landscape and visual	<input type="radio"/>									
Heritage	<input type="radio"/>									
Biodiversity	<input type="radio"/>									
Climate change	<input type="radio"/>									
Land ownership and acquisition	<input type="radio"/>									

Q5b Please tell us if there are any other key impacts you think we need to consider:

APPENDIX 1: CONSULTATION FEEDBACK FORM

Earthworks

Please see page 51 of the consultation document for more information about the earthworks that will be required to expand the airport. Expansion of the airfield will require significant earthworks in order to create a level platform.

A key issue relating to all the options to the north of the runway is whether we import the earth required from outside the area, necessitating a very large number of lorry movements on the road network over several years, or do we take earth from the site, close to where it is needed, but meaning greater changes to the local topography.

Q5c We propose to take earth from the site to avoid the significant extra traffic burden on the local area. Do you have any comments on this proposal?

Public open space

The options to expand the airport to the north of the runway would require Wigmore Valley Park to move east of both its current position and its identified location under the New Century Park proposals, while retaining the main entrance next to Wigmore Pavilion. To find out more please see page 52 of the consultation document.

Q5d When designing and constructing a replacement public open space, how would you prioritise the following? Please rank in order from 1 to 8, where 1 is the least important and 8 is the most important to you:
(Please tick one box per row and one box per column)

APPENDIX 1: CONSULTATION FEEDBACK FORM

	1 least important	2	3	4	5	6	7	8 most important
Park facilities (e.g. café, toilets, parking areas etc.)	<input type="radio"/>							
Park outlook	<input type="radio"/>							
Natural habitats (e.g. flora and fauna)	<input type="radio"/>							
Sports and recreational facilities (e.g. sports pitches, running / cycling routes, skate parks)	<input type="radio"/>							
Quality of children's play areas	<input type="radio"/>							
Accessibility from the surrounding community	<input type="radio"/>							
Surfaced and / or accessible paths (including for disabled users)	<input type="radio"/>							
Connections to other rights of way	<input type="radio"/>							

Q5e Do you have any other priorities that a replacement public open space should provide, or any other comments relating to our approach to providing replacement public open space?

APPENDIX 1: CONSULTATION FEEDBACK FORM

Noise

Q5f We recognise that expansion of London Luton Airport could bring associated noise impacts. How often are you currently affected by the following sources of airport-related noise? (Please tick one box per row)

	Frequently	Occasionally	Not at all	Don't know
Noise from departing and arriving aircraft	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise from aircraft on the ground	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise from increased road traffic	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Temporary noise during construction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q5g We are considering a range of potential measures to mitigate noise impacts from future airport expansion – see pages 54 to 57 of the consultation document for more information about noise mitigation. Please rank the following in order from 1 to 7, where 1 would bring the least benefit and 7 the most benefit to you:

(Please tick one box per row and one box per column)

	1 least benefit	2	3	4	5	6	7 most benefit
Restricting aircraft movements at night from 23:30-05:59 hrs to the existing permitted limit	<input type="radio"/>						
Providing incentives for airlines to adopt quieter aircraft	<input type="radio"/>						
Optimising flightpaths to mitigate the impact of noise from arriving and departing aircraft	<input type="radio"/>						

APPENDIX 1: CONSULTATION FEEDBACK FORM

Table continued

Reviewing the Noise Insulation Scheme which provides compensation for homeowners and businesses	<input type="radio"/>						
Improving use of space, reducing taxi time and queuing to reduce ground noise	<input type="radio"/>						
Using acoustic barriers to reduce ground and surface access noise	<input type="radio"/>						
Managing noise and vibration impacts during construction	<input type="radio"/>						

Q5h Do you have any comments or suggestions about the above measures that we are proposing in order to address noise impacts?

APPENDIX 1: CONSULTATION FEEDBACK FORM

Surface access

Q5i Pages 58 to 60 of the consultation document explain our surface access strategy. Do you agree with our key objectives to...? (Please tick one box for each objective)

	Agree	Disagree	Don't know
Promote greater use of public and sustainable modes of transport than London Luton Airport currently achieves	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identify possible improvements to the existing highway network before assessing if any new roads might be needed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q5j We will be assessing how we can provide access to an expanded London Luton Airport by all modes of transport, with a focus on rail, bus, walking and cycling. Are there any particular initiatives you would like to see implemented to support improved access to the airport by public / sustainable transport?

APPENDIX 1: CONSULTATION FEEDBACK FORM

Q5k We are assessing a number of locations on the highway network that may require improvement works to support an expanded London Luton Airport. Are there any particular locations you want to make sure we have considered as we develop our proposals?

Air quality

Q5l Please refer to pages 61 and 62 of the consultation document, where we outline the measures we are considering to manage the effects of expansion on air quality. Do you have any comments on these or any other air quality measures?

APPENDIX 1: CONSULTATION FEEDBACK FORM

Landscape and visual

Q5m Please refer to pages 63 and 64 of the consultation document, where we outline the measures we are considering to manage the landscape and visual effects of expansion. Do you have any comments on these or any other landscape and visual measures?

Heritage impacts

Q5n Heritage impacts are considered on pages 65 to 68 of the consultation document. Do you have any comments on our emerging strategy to preserve, understand and enhance public engagement with the historic environment?

APPENDIX 1: CONSULTATION FEEDBACK FORM

Biodiversity impacts

Q5o Biodiversity impacts are considered on pages 69 and 71 of the consultation document, including measures we are considering to minimise the impacts of our project on biodiversity, and opportunities we are seeking for enhancement. Do you have any comments on how we should minimise biodiversity impacts, and also where we should be looking to enhance the ecological environment?

6 Further comments

Q6 Do you have any further comments about our emerging proposals for the expansion of London Luton Airport or about this consultation?

APPENDIX 1: CONSULTATION FEEDBACK FORM

7 About you

It's useful for us to understand who has taken part in the consultation, so please can you provide some details about yourself. The information you give us will help in the analysis of the feedback.

Please be assured that your personal details will be kept confidential when reporting the findings and will not be shared with third parties.

Q7a Please provide your details below:

Name	<input type="text"/>
Address	<input type="text"/>
Postcode	<input type="text"/>
Email	<input type="text"/>

Q7b Are you...? (Please tick one box)

Male Female Prefer not to say

Q7c Which age group do you belong to? (Please tick one box)

Under 18 25 - 34 45 - 54 65 and over
 18 - 24 35 - 44 55 - 64 Prefer not to say

APPENDIX 1: CONSULTATION FEEDBACK FORM

Q7c Which age group do you belong to? (Please tick one box)

- Under 18 25 - 34 45 - 54 65 and over
 18 - 24 35 - 44 55 - 64 Prefer not to say

Q7d Do you consider yourself to have a disability? (Please tick one box)

- Yes No Prefer not to say

Q7e Which of the following groups best describes you? (Please tick one box)

- White - British Asian/Asian British - Pakistani
 White - Irish Asian/Asian British - Bangladeshi
 White - East European Other Asian
 Other White Black/Black British - Caribbean
 Mixed - White and Black Caribbean Black/Black British - African
 Mixed - White and Black African Black Other
 Mixed - White and Asian Chinese
 Other Mixed Other
 Asian/Asian British - Indian Prefer not to say
 Asian/Asian British - Kashmiri

APPENDIX 1: CONSULTATION FEEDBACK FORM

We may wish to contact you again to provide further information about the London Luton Airport expansion project or to keep you informed of progress. We may also send you information about news and events that we think might interest you. We can only do this if you provide explicit consent for us to contact you again.

Q7f Do you consent for us to contact you to...? (Please tick one box per row)

	Yes	No
Seek clarification or further information	<input type="radio"/>	<input type="radio"/>
Send you information about the London Luton Airport expansion project	<input type="radio"/>	<input type="radio"/>

Thank you for your comments

All feedback must be received by 5pm on Friday 31 August 2018

APPENDIX 2: STAKEHOLDER RESPONDENTS

Local authorities

Aylesbury Vale District Council
Buckinghamshire County Council
Central Bedfordshire Council
Chiltern District Council
Dacorum Borough Council
East Hertfordshire Council
Luton Borough Council
Milton Keynes Council
North Hertfordshire District Council
St Albans City and District Council
Stevenage Borough Council

Council groups

Stevenage Council Liberal Democrat group

Parish Councils

Berkhamsted Town Council
Caddington Parish Council (Planning Committee)
Chalgrove Parish Council
Flamstead Parish Council
Great Gaddesden Parish Council

Hardwick Parish Council
Hertford Town Council
Hertfordshire County Council
Kings Walden Parish Council
Little Gaddesden Parish Council
Pitstone Parish Council
Slapton Parish Council
The Lee Parish Council
Tring Town Council
Welwyn Parish Council
Wheathampstead Parish Council
Wigginton Parish Council

Members of Parliament

Kelvin Hopkins MP

Statutory bodies

Highways England
National Grid plc
Public Health England
Royal Mail Group Limited
Chilterns Conservation Board

Campaign and civic groups

Bedfordshire Climate Change Forum
Bedwell Residents' Group
The Breachwood Green Society
Buckinghamshire and Milton Keynes Association of Local Councils
Campaign to Protect Rural England Hertfordshire
The Chiltern Countryside Group
Chiltern Society
Federation of Small Businesses
HarpendenSky.com
Harpenden Society
Hertfordshire Association of Parish and Town Councils
Hitchin Forum
The Hitchin Society
London Luton Airport Town and Village Communities Committee
Luton And District Association for the Control of Aircraft Noise (LADACAN)
Luton Friends of the Earth
People Against Aircraft Intrusive Noise (PAIN)

Residents affected by flights that take-off in an Easterly direction over Stevenage

Rural Heritage Society of Little Gaddesden, Ringshall, Hudnall and Ashbridge

St Albans Civic Society

St Albans Quieter Skies

Welwyn Planning and Amenity Group

Wheathampstead and District Preservation Society

Other

Abbey Land Developments Limited

Drilltec (East Anglia) Ltd

Landscape Futures CIC

Prolateral Consulting Ltd

APPENDIX 2: STAKEHOLDER RESPONDENTS

How to contact us:

Email: futureluton@lla.org.uk

Write to us: FREEPOST FUTURE LUTON LLAL

www.futureluton.lla.org.uk

www.lla.org.uk

 London Luton Airport Ltd

 @LLA_Ltd