

1. Introduction

The 2014 Planning Permission

1.1.1 On 23 June 2014, London Luton Airport Operations Limited (hereafter referred to as 'the Applicant') was granted planning permission subject to conditions for the following development at London Luton Airport ('LLA'), Airport Way, Bedfordshire.

"Full planning application for dualling or airport way/airport approach road and associated junction improvements, extensions and alterations to the terminal buildings, erection of new departures/arrivals pier and walkway, erection of a pedestrian link building from the short –stay car park to the terminal, extensions and alterations to the mid-term and long-term car parks, construction of a new parallel taxiway, extensions to the existing taxiway parallel to the runway, extensions to existing aircraft parking aprons, improvements to ancillary infrastructure including access and drainage, and demolition of existing structures and enabling works. Outline planning application for the construction of a multi-storey car park and pedestrian link building (all matters reserved)" (ref: 12/01400/FUL) (hereafter referred to as the 'June 2014 Permission')

1.1.2 The planning application for the June 2014 Permission was submitted on 3 December 2012 (the 'December 2012 Application'). The December 2012 Application was accompanied by an Environmental Statement (ES) dated November 2012 (the 'November 2012 ES') prepared by Terence O'Rourke Ltd.

1.1.3 The November 2012 ES was prepared under the *Town and Country Planning (Environmental Impact Assessment) Regulations 2011* (the '2011 Regulations')¹ and assessed the likely significant effects of the proposed development pursuant to the December 2012 Application in relation to the following topics:

- Air quality and climate;
- Cultural heritage;
- Ecology and nature conservation;
- Community and economic;
- Ground conditions;
- Landscape and visual impact;
- Noise and vibration;
- Traffic and transport; and
- Water environment.

1.1.4 Additionally, a Health Impact Assessment was included as an appendix in the November 2012 ES.

1.1.5 Following the grant of the June 2014 Permission, an application was submitted on 25 June 2015 for variation of condition 11(i) to vary an element of the noise controls applied to the June 2014 Permission (the 'Variation Application'). The Variation Application was accompanied by an ES Addendum dated July 2015 which described the proposed changes in full and presented an assessment of any new or different likely significant effects on the environment as a result of the

¹ Town and Country Planning (Environmental Impact Assessment) Regulations 2011 [online]. Available at: <https://www.legislation.gov.uk/uksi/2011/1824/contents/made> [Accessed 20 December 2020].

Variation Application (the 'July 2015 Addendum'). The July 2015 Addendum did not affect the assessment or conclusions of a majority of the November 2012 ES because it only related to the variation of operational noise and violation limits. Therefore, the July 2015 Addendum only assessed noise and vibration environmental effects.

- 1.1.6 Planning permission was granted for the Variation Application on 13 October 2017 (reference: 15/00950/VARCON) subject to conditions (the 'Variation Permission').
- 1.1.7 The Variation Permission repeated the description of development and conditions imposed on the June 2014 Permission (save where certain conditions had been discharged and save also for the amendment to condition 11). The Variation Permission therefore represents the existing consented position in relation to the development and is referred to in this ES Addendum as the '2014 Planning Permission'.
- 1.1.8 The ES in relation to the development consented by the 2014 Planning Permission therefore comprises the November 2012 ES and the July 2015 Addendum. They are referred to in this document collectively as the '2012 ES'.

1.2 The proposed amendments

- 1.2.1 The 2014 Planning Permission contains a condition (Condition 8) which limits the commercial passenger throughput of the airport to 18 million passengers per annum (mppa -this is the number of passengers that fly in or out of the airport in any twelve month period). This is referred to throughout this ES as the '18 mppa cap'.
- 1.2.2 The 18 mppa cap imposed by the 2014 Planning Permission reflected the forecasts at that time, which anticipated that LLA would see a steady rise to around 18 mppa by about 2027. According to the London Luton Airport Vision for Sustainable Growth 2020-2050², the latest forecasts for LLA anticipated that the 18 mppa capacity was expected to be fully utilised by 2020. However, LLA reached the 18 mppa cap during 2019³, almost a decade earlier than originally forecast in the 2012 ES. The Applicant is therefore seeking to increase the 18 mppa cap to a 19 mppa cap.
- 1.2.3 The Applicant is also seeking to vary the 2014 Planning Permission such that it provides for a less restrictive day and night contour than is currently set out. This is proposed to be achieved through adjustments to the area enclosed by both the daytime and night-time contours.
- 1.2.4 These amendments are proposed to be effected through a variation of 5 conditions attached to the 2014 Planning Permission. Full details of these amendments are set out in **Chapter 3: Description of the Proposed Scheme**. These amendments are hereafter referred to as the 'Amendments'.
- 1.2.5 The Amendments can be accommodated without any new operational development. The additional passengers pursuant to the 19 mppa cap would be accommodated through a small increase in the number of air transport movements ('ATMs') and the use of larger aircraft (See **Section 3.3, Table 3.3, and Table 3.4**).

² London Luton Airport Ltd (n.d.). London Luton Airport Vision for Sustainable Growth 2020 – 2050, [online]. Available at: <https://www.llal.org.uk/Documents/vision2020-2050.pdf> [Accessed 11 May 2020].

³ London Luton Airport Operations Limited (LLAOL), (2019). Carbon footprint report. [online]. Available at: <https://www.london-luton.co.uk/LondonLuton/files/50/50af686c-ffae-49fd-981d-180f588dd5d6.pdf> [Accessed 14 September 2020].

Summary of proposed amendments

- 1.2.6 The planning application for the Amendments seeks to increase the annual passenger cap from 18 mppa to 19 mppa through the variation of the following five conditions attached to Variation Permission:
- 1.2.7 **Condition 8: Passenger throughput cap** - the modification of Condition 8 would allow passenger throughput at LLA to rise to 19 mppa without necessitating any additional on-site or off-site development.
- 1.2.8 **Condition 10: Noise contours** - variation to the wording of Condition 10 would provide a less restrictive day and night noise contour. This adjustment is required to reflect the fact that in recent years there has been a slower than anticipated introduction by airlines of the next generation of quieter aircraft. The modernisation of fleets, which is largely outside the control of the airport, has not kept pace with the unexpectedly steep rise in passenger demand.
- 1.2.9 **Condition 22: Car parking management** - no changes to the airport's existing car parking facilities are proposed to accommodate the additional passengers. However, an updated Car Parking Management Plan (CPMP) is being provided to support the 19 mppa proposal and therefore a variation to Condition 22 is required.
- 1.2.10 **Condition 24: Travel Plan** – an updated Travel Plan to accommodate 19 mppa is being provided to support the 19 mppa proposal and therefore a variation to Condition 24 is required.
- 1.2.11 **Condition 28: Approved plans and documents** - updated submissions across a suite of technical evidence-based assessments necessitates the variation of Condition 28 which sets out the approved documentation in support of planning permission.

1.3 Scope of this Environmental Statement

- 1.3.1 This ES Addendum has been prepared to consider whether the Amendments are likely to alter the conclusions of the 2012 ES and to identify whether there are any additional or new likely significant environmental effects arising from the Amendments to the development consented by the 2014 Planning Permission. This ES has been prepared in accordance with the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017* (the '2017 Regulations')⁴ taking into account new requirements for assessment of significant effects in relation to the Amendments.
- 1.3.2 The 2012 ES, supplemented by this ES Addendum, read together, set out the assessment of the likely significant environmental effects of the development consented by the 2014 Planning Permission including the Amendments (the 'Proposed Scheme'). Where relevant, new matters required to be considered by the 2017 Regulations have been assessed in relation to the Amendments.
- 1.3.3 A number of the topics considered in the 2012 ES do not require further consideration since the Amendments will not materially affect the previously identified effects presented in the 2012 ES and will not introduce any additional significant environmental effects. The topics for which no material changes are likely to occur to the previously identified effects and no further technical assessment is required are set out below under the heading 'Screening'. New topics required to be considered by the 2017 Regulations have been considered in relation to the Amendments. Further information is set out in **Section 4.4**.
- 1.3.4 This ES Addendum draws upon the comments provided by LBC within the Screening Opinion (**Appendix 1B** in **Volume 3: Figures and Appendices**), scoping meeting (**Appendix 1C** in **Volume**

⁴ Town and Country Planning (Environmental Impact Assessment) Regulations 2017 [online]. Available at: http://www.legislation.gov.uk/uksi/2017/571/pdfs/ukxi_20170571_en.pdf [Accessed 25 August 2020].

3: Figures and Appendices), and subsequent assessment work. For the remaining topics, the Amendments may materially change the previously identified significant effects or introduce new significant effects and therefore a revised assessment or further assessment has been undertaken and the results are presented in this ES Addendum. There are also areas whereby the updated 2017 Regulations require assessment whereas the 2011 Regulations did not.

1.3.5 The topics which may be affected by the Amendments of the Proposed Scheme or for which assessment is now required comprise:

- Air quality;
- Climate change;
- Noise;
- Health; and
- Transport.

1.3.6 The results of the additional assessment for these topics are presented in **Chapters 6 – 10** of this ES Addendum (hereafter referred to as the 'ES') and supported by technical reports which are provided as appendices.

Screening

1.3.7 The first stage of the EIA process is to confirm whether a proposed scheme triggers the need for an EIA by undertaking a screening assessment. This involves screening against the descriptions of development given in Schedule I⁵ and II⁶ of the 2017 EIA Regulations. For proposed schemes listed under Schedule I of the 2017 EIA Regulations an EIA is mandatory. If a proposed scheme is listed in Schedule II an EIA is required where it is likely to have significant effects on the environment, by virtue of factors such as its nature, size, or location.

1.3.8 A formal Screening Opinion (**Appendix 1A in Volume 3: Figures and Appendices**) was sought from LBC for the variations associated with the Proposed Scheme. Consideration against the criteria set out in Schedule II of the 2017 EIA Regulations is shown in **Table 1.1**. This indicates that the Proposed Scheme meets threshold (i) of paragraph 13(b) and has the potential to have significant effects on the environment, due to the characteristics, location, and potential impact. The Proposed Scheme was screened against the criteria set out in Schedule III. LBC in its Screening Opinion (**Appendix 1B in Volume 3: Figures and Appendices**) considered that the resultant noise impact of the Proposed Scheme is likely to have a significant environmental effect, which has the potential to harm human health. Therefore, the Proposed Scheme was deemed EIA development therefore requiring the environmental impacts of the proposal to be properly assessed and presented in an ES.

Table 1.1 Schedule II criteria of the 2017 EIA Regulations for which the Proposed Scheme was considered against

Column 1: Description of development	Column 2: Applicable thresholds and criteria
13. Changes and extensions	
<i>“(a) Any change to or extension of development of a description listed in Schedule 1 (other than a change or extension falling</i>	<i>“Either-</i>

⁵ Schedule I - descriptions of development for the purposes of the definition of “schedule I development”

⁶ Schedule II - descriptions of development and applicable thresholds and criteria for the purposes of the definition of “schedule II development”

Column 1: Description of development	Column 2: Applicable thresholds and criteria
<i>within paragraph 24 of that Schedule) where that development is already authorised, executed or in the process of being executed."</i>	<p>(i) The development as changes or extended may have significant adverse effects on the environment; or</p> <p>(ii) in relation to development of a description mentioned in a paragraph in Schedule 1 the thresholds and criteria in column 2 of the paragraph of the table applied to the change or extension are met or exceeded."</p>
<i>"(b) Any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed."</i>	<p>"Either-</p> <p>(i) The development as changed or extended may have significant adverse effects on the environment; or</p> <p>(ii) in relation to a development of a description mentioned in column 1 of this table, the thresholds and criteria in the corresponding part of column 2 of this table applied to the change or extension are met or exceeded."</p>

Scoping

- 1.3.9 A meeting between the Applicant's team and LBC was held on September 7 2020 to discuss and agree the potential likely significant environmental effects associated with the Proposed Scheme. In this meeting the scope of the EIA was agreed with LBC (**Appendix 1C** in **Volume 3: Figures and Appendices**).

Preparation of the Environmental Statement

- 1.3.10 The third stage of the EIA process involves the preparation of an ES. The ES provides information relating to the likely significant environmental effects of the Proposed Scheme; it is intended for use by LBC and other stakeholders, to inform the process of determining the application for planning permission.

1.4 Approach of this Environmental Statement

- 1.4.1 The overall approach that has been taken to defining significance, as well as further information about the approach to preparing the ES, are outlined in **Chapter 4: Approach to preparing the Environmental Assessment** of this document.
- 1.4.2 As set out in Schedule 4 of the 2017 EIA Regulations, this ES contains the following information:
- The location of the development (**Figure 1.1** in **Volume 3: Figures and Appendices**);
 - The characteristics and land-use requirements of the Proposed Development, considering construction and operation (including requisite demolition works where relevant) (see **Chapter 3: Description of the Proposed Scheme**);
 - Operational processes such as energy, materials and natural resources used (see **Chapter 3: Description of the Proposed Scheme** and **Chapters 6 – 10**);
 - Any residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases) (see **Chapter 6 – 10**);
 - The reasonable alternatives that the developer has studied with a comparison of their environmental effects (see **Chapter 2: Proposed Scheme needs and alternatives**);

- *The baseline environment and its evolution in the absence of the development (see **Chapter 6 – 10**);*
- *A description of the likely significant effects of the Proposed Development on environmental factors - population, human health, biodiversity, land, soil, water, air, climate, material assets, cultural heritage and landscape (see **Chapter 6 – 10** and summarised in **Chapter 11: Summary**);*
- *A description of the methods used in the assessment to determine whether significant effects are likely to occur (see **Chapter 6 – 10**);*
- *A description of measures and monitoring that have been identified to address likely significant effects (see **Chapter 6 – 10**);*
- *A description of the development's vulnerability to major accidents and disasters (scoped out of the assessment, see **Chapter 4** for further details);*
- *A non-technical summary (**Volume 1, Non-Technical Summary**); and*
- *A list of references (see footnotes).*

1.4.3 Regulation 4 and Schedule 4 of the 2017 EIA Regulations require that the environmental topics listed in column 1 of **Table 1.2** need to be considered when preparing an ES. Column 2 then lists where these topics are included in this ES, with reference to the relevant chapter numbers.

1.4.4 Further information on the reasons why certain topics were scoped out of the assessment is provided in **Chapter 4: Approach to preparing the Environmental Statement**.

Table 1.2 Environmental topics to be addressed in the ES and chapter references

Topics ⁷ that need to be assessed under the EIA Regulations	Chapter titles in this ES
Population	Human health [Chapter 9]
Human health	Air quality [Chapter 6], Human health [Chapter 9], and Noise [Chapter 8]
Biodiversity	Scoped out of the assessment [Chapter 4]
Land	Scoped out of the assessment [Chapter 4]
Soil	Scoped out of the assessment [Chapter 4]
Water	Scoped out of the assessment [see Chapter 4 , and the Drainage and water supply infrastructure appraisal document reference: 41431JG22V2]
Air	Air quality [Chapter 6], and Transport [Chapter 10]
Climate	Climate [Chapter 7]
Material assets	Climate [Chapter 7], Transport [Chapter 10] Waste scoped out of the assessment - see document 41431BNV2 for the updated Site Waste Management Plan.
Cultural heritage	Scoped out of the assessment [Chapter 4]

⁷ In this ES, the word 'topic' is used when referring to the environment that could be affected by the proposed development. Other words with the same general meaning are used in the 2017 EIA Regulations, notably 'factor' and 'aspect', but these are not used in the same context within this ES.

Topics ⁷ that need to be assessed under the EIA Regulations	Chapter titles in this ES
Landscape	Scoped out of the assessment [Chapter 4]
Waste and Resource Use	Scoped out of the assessment - see document 41431BNV2 for the updated Site Waste Management Plan
Major Accidents and Disasters	Scoped out of the assessment [Chapter 4]
Interaction between the above factors	These are discussed within each Chapter where relevant.
Cumulation with other projects	Cumulative effects [Chapter 4]

1.5 The Applicant and the project team

- 1.5.1 This ES has been prepared on behalf of the Applicant (LLAOL) by Wood Group UK Limited (hereafter referred to as Wood), with the support of Public Health by Design.
- 1.5.2 Wood is registered with the Institute of Environmental Management and Assessment (IEMA) EIA Quality Mark scheme. The scheme allows organisations that lead the co-ordination of EIAs in the UK to make a commitment to excellence in their EIA activities and have this commitment independently reviewed.
- 1.5.3 A statement outlining the relevant experience and qualifications of the competent experts who have prepared this ES is provided in **Appendix 1D** in **Volume 3: Figures and Appendices**. A statement from the Applicant that confirms that it considers the experts to be competent is included in **Appendix 1E** in **Volume 3: Figures and Appendices**.

1.6 Structure of this Environmental Statement

- 1.6.1 The ES comprises 3 volumes:
- **Volume 1** is a Non-Technical Summary (NTS), which is available as a standalone document.
 - **Volume 2** (i.e. this volume) is sub-divided into the following chapters.
 - ▶ **Chapter 2** explains the need for the Proposed Scheme, outlines the main alternatives considered for meeting this need and indicates the main reasons for the preferred choice.
 - ▶ **Chapter 3** provides a detailed description of the Proposed Scheme and associated changes to the airport.
 - ▶ **Chapter 4** details the approach that has been adopted in preparing the ES.
 - ▶ **Chapter 5** provides an overview of the legislation and policies that are relevant to the ES.
 - ▶ **Chapters 6 to 10** set out the technical assessments for the environmental topics that are scoped in the ES.
 - ▶ **Chapter 11** provides a summary of all the environmental topics considered within this ES.
 - **Volume 3** contains the appendices and figures referred to in the ES.
- 1.6.2 A glossary of technical terms is provided in **Appendix 1F** in **Volume 3: Figures and Appendices** and list of abbreviations is provided in **Appendix 1G** in **Volume 3: Figures and Appendices**.

1.7 Other documents

1.7.1 The planning application for the Proposed Scheme is informed by the ES, but is also informed by other documents, the contents of at least some of which are of direct relevance to the findings of the ES. The latter reports, which are listed below, are therefore included within the planning application submission:

- Consultation summary report (see document reference **41431EP12V2**);
- Drainage and water supply infrastructure appraisal (see document reference **41431JG22V2**);
- Planning Statement (see document reference **41431EP12V103**);
- Transport assessment (see document reference **41431MP17V1**);
- Site Waste Management Plan (see document reference **41431BNV2**).

1.8 Access to the Environmental Statement

1.8.1 The ES is available in electronic form via LBC's online planning portal and Luton Airport's Consultation website (<http://www.luton19mppa.info/>). Hard copies will not be made available due to it not being reasonably practicable to do so connected to the effects of the COVID-19 pandemic, this follows the May 2020 and December 2020 Temporary Amendments to the 2017 EIA Regulations⁸.

⁸ Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020 [online]. Available at: <https://www.legislation.gov.uk/uksi/2020/505/made> [Accessed 08 January 2021].