



Dacorum Borough Council (20040781)
Hertfordshire County Council (20040777)
North Hertfordshire District Council (20040773)

Summary of Relevant Representation of the Hertfordshire Host Authorities

The Hertfordshire host authorities (Dacorum, Hertfordshire, North Hertfordshire) have commissioned WSP/Suono/Pinsent Mason to review a range of the submission documents and their findings are summarised below. The authorities have identified a number of supplementary issues thus/thus.

Air Quality

Applicant should clarify if consultation with Natural England took place and if the method to determine ammonia emissions and nitrogen deposition impacts was agreed. The Green Controlled Growth Framework monitoring plan is inadequate.

The limits and thresholds for Air Quality and monitoring thereof only propose to use annual average concentration limits for Nitrogen Dioxide and Particulate Matter (PM_{2.5}, PM₁₀). Short term impacts of air pollution on health can give rise to a range of health effects from mild, to severe, to mortality and must be addressed going forward to ensure air pollution is not the cause of significant short term impacts on human health. The proposed use of annual average limits and the use of AQ Mesh monitors as the main detection instrument is highly likely to miss short term pollution episodes that may be significant for health and are therefore not considered adequate.

Biodiversity

A thorough overview of the likely impacts on biodiversity. Concerns include consistency of assessment of receptors, the framing of habitat compensation as embedded mitigation within the Proposed Scheme and likelihood of long term certainty of the mitigation proposed.

Climate Change Resilience

Robust assessment required of the impact of climate change and a requirement for mitigation measures throughout the design life of the development.

Greenhouse Gases

No material comments regarding the assessment but it will be essential for the process to thoroughly test this and the compatibility of the proposal with Government policy.



Cultural Heritage

Lack of historic hedgerows assessment, failure to assess settings impacts to non-designated assets, the need to include 'quietness' as a contribution to setting and the impacts of noise on that asset's setting.

Archaeology

Lack of clarity on whether the possible Roman building (HER ref. 7358) is present within the Proposed Development Site, and the potential adverse environmental effect is unreported. Failure to report the potential adverse environmental effect arising from construction phase impacts on possible buried remains associated with Winch Hill Farm (HER 11016) and on impacts upon possible previously unrecorded archaeological remains dating from the prehistoric period onwards. Need to clarify that part of the site that has not yet been evaluated as this is a clear limitation and provide information on the nature of the development proposals that might have an archaeological impact.

Traffic and Transportation

Concerns with both the inputs to the modelling and the consequent outputs. A scenario where the existing and proposed Smart Motorways are removed from the M1 is recommended and the additional localised impacts should be assessed in greater detail.

Proposed mitigation measures in Hertfordshire are set out to a minimal level of detail or have been designed without some consideration of improvements for active and sustainable travel modes. There are various detailed issues/problems with design drawings.

Almost no detail is provided on walking, cycling or public transport measures in Hertfordshire.

The CTMP outline appears inadequate for a range of reasons including the risk of impact on local businesses in surrounding towns in Hertfordshire.

Need for technical engagement on the assumptions made in relation to and the potential impacts of East-West highway access through Hertfordshire, the modelling for and design of Hitchin Junctions and the location and purpose of traffic management locations to the east of the airport.

Landscape and Visual

Assessment is agreed but it lacks clarity, transparency and a robustness of reporting. Lack of consideration of aesthetic and perceptual qualities contributing to landscape character. The impacts on the AONB are not fully considered. *Concerns about the*



visual impact of the storage tanks shown on the Illustrative Masterplan in the Strategic Landscape Masterplan and further detail required on the landscape masterplan and implementation, and long-term management and funding for public land within North Hertfordshire.

Noise and Vibration

The proposal does not comply with UK aviation noise policy or emerging policy. Assessments are not portrayed consistently or transparently. The air noise assessment seeks to present a case of noise reduction over time through focusing on the wrong test and use of a baseline that was not in compliance with extant planning conditions. The incorrect methodology allows claims of noise reduction, rather than the clear noise increase brought about by the proposed development compared to the do minimum case in all future years. This key indicator of the likely scale of impact is only presented as a sensitivity case.

Water resources and flood risk

There is a lack of detail provided regarding drainage design (including water treatment), water re-use and groundwater modelling.

Economics and employment

Assessment is likely to be broadly correct in respect of the effects which are assessed. Not all effects are quantified and some may have been overlooked. Accuracy of estimates depends on assumptions regarding inputs for which main uncertainties include the forecast level of passenger demand and the impacts of outbound tourism.

Health and Community

Baseline not given enough attention to the communities situated in close proximity to the airport. Risk that vulnerable groups within districts situated in close proximity to the airport have not been identified, and potential impacts missed. Mitigation to address the significant effect on mental wellbeing should be identified and secured to minimise harm on the affected populations.

Need

Whilst the team have not identified any fundamental concerns with the need case for the proposal, it will need to be a priority and fully interrogated.

Green Controlled Growth

The team have identified a number of concerns in relation to GCG Framework in terms of its content, operation and enforcement. Further engagement with the applicant will be needed.



Unidentified Local Impacts Management

Lack of clarity on the approach to be taken to the identification, management and funding of unidentified local impacts management, particularly given the longevity of the proposal and the potential for circumstance and potential impacts to change over time.

Baseline adopted for assessment purposes

The process needs to ensure that the approach to identification and use of baselines and therefore the consequential assessment of impacts of the proposal are robust.

Draft DCO/s106

There are a range of matters relating to the Draft DCO that the authorities will need to pursue and s106 agreement require further clarification and engagement.

The position of the Hertfordshire host authorities

Dacorum Borough Council

'The application in its current form lacks sufficient clarity, transparency and consistent methodology to provide sufficient reassurance to local communities that the airport can grow and be operated in a responsible manner to achieve sustainable growth as set out in Aviation 2050. The evidence does not currently exist that environmental, health and well-being, and surface access impacts will be within agreed and acceptable limits that can be appropriately enforced and will achieve overall betterment to local communities. Dacorum Borough Council therefore has in-principle objection to growth of the airport pending satisfactory and appropriate resolution of those matters.'

Hertfordshire County Council

'Unless and until there is evidence to demonstrate, and mechanisms to ensure, that the Airport can grow and be operated in a responsible manner, in the spirit of the Government's aspiration for a partnership for sustainable growth set out in Aviation 2050, which contains its environmental impacts to within prescribed acceptable and agreed limits that are enforceable, can achieve an overall betterment in the amenity and health of the communities impacted by it – both immediate and further afield, and can adequately provide for the surface access needs required of it, the County Council has an in-principle objection to growth of the Airport. This evidence does not currently exist.'

North Hertfordshire District Council



'North Herts Council objects in principle to the proposed scale of expansion of London Luton Airport on the grounds that it is inconsistent with the Council's declaration of a climate emergency and with national targets on decarbonisation for 2030, 2035 and 2050.

The Council is unpersuaded that the evidence submitted and the enforcement mechanisms proposed in the DCO application reports are sufficient to demonstrate that the Airport can grow by 78% (from 18mppa to 32mppa) and still meet its climate change obligations in full, as required by national policy.

Furthermore, the Council remains concerned that the impacts on North Herts' residents, businesses, heritage and natural environment, in terms of increased air pollution, noise exposure and road traffic, have not been robustly modelled and that the proposed mitigations and remedies are inadequate. Without prejudice to its in-principle objection to the development, the Council is willing to engage with the applicant to review the data and analysis, agree any additional data and analysis required, and co-design any additional or altered mitigations with a view to making the proposed development acceptable in planning terms to the Council.'