

Integrated Impact Assessment Form (IIA)

The key aim of an impact assessment is to ensure that all Council policies, plans and strategies support the corporate mission statement

‘Enabling Luton to be proud, vibrant, ambitious and innovative’.

Why do I need to do an IIA?

The aim of this impact assessment process is to:

- Ensure adherence to the legal duties contained within the Equality Act 2010 and associated Public Sector Duty to analyse the impact of decisions to be undertaken by Council.
- Ensure the Council has **due regard** to equality taking a proportionate and timely approach to analysing the impact on citizens.
- Minimise duplication of initial impact assessments with regards to Environment and Health and maximise consideration of other key Council priorities of Inclusion and Community Cohesion.
- Ensure that the Council has been able to consider the social, health, environmental and economic impacts in its decision making in a single document and, where necessary enable the production of a comprehensive action plan to mitigate any potential negative impacts identified.

When do I need to do an IIA?

- An IIA must be started at the beginning of any project, policy or strategy, and cannot be finalised until such time as all consultations, as required, are undertaken.
- The Impact Table will help you to make early consideration of the potential impacts of your proposal and should be used from the point at which preliminary report is taken to Corporate Leadership and Management Team (CLMT) where appropriate. By using this table at your earliest point in the project, potential impacts can be highlighted and it will also be clear whether you need to carry out a full IIA.
- If you complete this table and all impacts identified are neutral, i.e. there is no noticeable impact on characteristics and priorities listed and you are fully confident of this, please contact the SJU by email setting out how you have reached this judgement as it is unlikely you will need to carry out a full IIA.
- An IIA must at all times identify those who will be affected by the decision, policy or strategy.
- At a time of economic austerity IIA authors are minded to consider the whole range of decisions, both locally and nationally when analysing the impact on citizens.
- Your first early draft is to be sent to the Social Justice Unit for comments and guidance
- Once consultation has ended, the IIA must be updated with results of the consultation and returned to Executive, where required, for further consideration and approval – at this stage it will be signed off as completed by the Social Justice Unit.

If you need further guidance please contact the Social Justice Unit (SJU). Please see links at the end of this document to key Corporate and Partnership documents that may help you complete this IIA.

Integrated Impact Assessment Form (IIA)

Proposal Title:	London Luton Airport Master Plan
Lead Officer Name:	Sunil Sahadevan
Date of IIA:	8/11/2021

Date updated after consultation:	
Early draft Seen by: <i>(Please send an early draft of your IIA to the SJU to ensure all impacts are being considered at the appropriate time)</i>	Maureen Drummond, Equality and Diversity Adviser, 27 September 2021

Finalised IIA Signed and seen by SJU :	
Name:	Maureen Drummond, Equality and Diversity Adviser
Date	9 November 2021

Names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted with and agreed this assessment: <i>(Please note the IIA must not be carried out by one person)</i>	David Gurtler, John Steel QC, Vernon Cole (Suono Noise Consultants), Sue Frost
If there is any potential impact on staffing please include the name/s of the trade union representative/s involved in the preparation of this assessment or any supporting evidence of request to participate:	No

Proposal Outline

Information supporting the proposal (**who, what, where, how, why**). Breakdown of present users by ethnicity, age, sex, disability, religion/belief, sexual orientation (if recorded). Show areas in the town with the biggest and lowest needs. Greater emphasis is required at the start of the IIA on the service, how it is delivered now and how the new service will be delivered.

This report relates to London Luton Airport Operations Limited's (LLAOL) Master Plan 2021. LLAOL are a private company responsible for the operation of London Luton Airport.

The report will be considered by Executive on Tuesday 23 November 2021.

The Airport Master Plan with which the decision is concerned is not a Supplementary Planning Document (SPD) or Local Development Document (LDD), does not have any policy status, and is not the subject of statutory public consultation in the same way that any development plan or SPD is required to have.

The decision which is being requested of the Executive is not one which is to consider the detail or consequences of any planning application, which is a separate consideration to be carried out under statutory development management procedures. The decision is to adopt the Airport Master Plan in accordance with policy LLP6 B(iii) of the Local Plan. The use of the word 'adopt' in this context means to approve or accept and not any other type of formal decision as such.

Airport master plans do not have a statutory basis, however, the government, through the Aviation Policy Framework (APF) 2013, recommends that airport operators prepare master plans to provide a clear statement of intent in relation to the future development of the airport which will then be given due consideration in the local planning process.

The APF recommends that airport master plans are updated every five years and that the airport operator consult on the proposals, engaging with local communities. The previous Airport Master Plan was produced in 2012 and covered the expansion of the airport to 18 million passengers per annum (mppa), an updated Airport Master Plan has now been prepared, with LLAOL having undertaken public consultation between 7 October and 11 November 2020, prior to publishing the Airport Master Plan in January 2021.

The government anticipates that in the case of most airports, master plans will focus on five core areas to inform future land use, transport and economic planning processes. The core areas are: forecasts; infrastructure proposals; safeguarding and land/property take; impact on people and the natural environment; and proposals to minimise and mitigate impacts. The London Luton Airport Master Plan 2021 addresses these core areas.

The Airport Master Plan sets out LLAOL's intention to increase passenger numbers to 19mppa, with no additional infrastructure being required to achieve this. There will be an increase in the number of flights by around 1,100 movements (in 2019 there were 141,481 aircraft movements, therefore this represents an increase of less than 1%). The reason that the increase in passengers does not result in a similar percentage increase in flights is that they will be accommodated in higher load factors (i.e. a greater percentage on board) and newer aircraft types that have more seats than the old generation aircraft. The increased passenger numbers will also have an effect on traffic and on public transport.

A planning application for the increase to 19mppa was submitted in January 2021 and was accompanied by an environmental statement. The environmental impact assessment has addressed the key issues affecting Luton and the surrounding area. The impacts that are assessed include climate, air quality, noise, health and transport. In terms of carbon emissions the assessment concludes that there would be a minor adverse effect, but that

this was not significant. Air quality impacts are assessed as negligible and not significant, though the noise impacts are identified as 'significant adverse' since more dwellings would be exposed to significant adverse effects, albeit the increase is only the equivalent of a 1dB change and such a change is not normally considered to be perceptible. Furthermore, the increased exposure is predicted to be for a temporary period). The health effects relate to the noise exposure and so are identified as moderate adverse. The increased passenger numbers are likely to have a minimal effect on traffic volumes and so the significance is assessed as negligible.

In terms of the population that will be most affected, it is the population within the 55dB night-time noise contour which increases in size for a temporary period (up to 2024, after which point the continued modernisation of the fleet will result in the area exposed to significant adverse noise effects reducing) and so introduces more people to significant observable adverse noise levels. The areas within this contour to the west of the airport include part of Park Town, New Town, Stockwood Park up to Slip End, whilst to the east of the airport it includes part of Wigmore Valley Park, Breachwood Green and the rural area beyond. The population exposed to the increased noise will include protected groups, though it is considered that such groups will not be disproportionately affected compared to the general population within those areas.

The planning application to increase the passenger numbers and temporarily vary the noise contours will be reported to the Development Management Committee on 30 November and 1 December 2021.

Any decision concerning airport expansion will necessarily have to be a matter for determination by the Development Management Committee off the Council.

There are no specific proposals within the Airport Master Plan which relate to ethnicity, age, sex, disability, religion/belief or sexual orientation. It is also difficult to make an indirect link between the proposals and ethnicity, age, sex, disability, religion/belief or sexual orientation.

Impact Table

The purpose of this table is to consider the potential impact of your proposal against the Equality Act 2010 'protected characteristics' and the Council's Social, Environmental and Economic priorities.

Once you have completed this process you should have a clearer picture of any potential significant impacts¹, **positive**, **negative** or **neutral**, on the community and/or staff as a result of your proposal. The rest of the questions on this form will help you clarify impacts and identify an appropriate action plan.

Protected Groups	Citizens/Community			Staff (for HR related issues)		
	Positive	Negative	Neutral	Positive	Negative	Neutral
Race			X			
Sex			X			
Disability			X			
Sexual Orientation			X			
Age			X			
Religion/Belief			X			
Gender Reassignment			X			
Pregnancy/Maternity			X			
Marriage/Civil Partnership (HR issues only)			X			
Care Responsibilities ² (HR issues only)			X			
Social & Health ³						
Impact on community cohesion			X			
Impact on tackling poverty	X					
Impact on health and wellbeing		X				
Environment						
Impact on the quality of the natural and built environment		X				
Impact on the low carbon agenda		X				
Impact on the waste hierarchy			X			
Economic/Business						
Impact on Luton’s economy and/or businesses	X					
Impact on jobs	X					
Impact on skills	X					

¹ "Significant impact" means that the proposal is likely to have a noticeable effect on specific section(s) of the community greater than on the general community at large.

² This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

³ Full definitions can be found in section 3

Please answer the following questions:

1. Research and Consultation
1.1. Have you made use of existing recent research, evidence and/or consultation to inform your proposal? Please insert links to documents as appropriate.
Click here for local demographics and information
Reference is made to the Aviation Policy Framework (2013), the Airport's 2012 Master Plan, the Airport's 2021 Master Plan, and the planning application (including the addendum to the environmental statement that has been provided in compliance with the Town and Country Planning [Environmental Impact Assessment] Regulations 2017).
1.2. Have you carried out any specific consultation with people likely to be affected by the proposal? (if yes, please insert details, links to documents as appropriate).
Guidance Notes: <i>If you have not yet undertaken any consultation you may wish to speak to the Consultation Team first as a lack of sufficient consultation could place the Council at risk of legal challenge.</i>
Click here for the LBC Consultation Portal
We have not undertaken any specific consultation in relation to LLAOL's Airport Master Plan. The airport operator (LLAOL) carried out public consultation between October and November 2020.
1.3. Have you carried out any specific consultation with citizens likely to be affected by the proposal? If yes, please insert details, links to documents, as appropriate above. Please show clearly who you consulted with, when you consulted and the outcomes from the consultation. Mitigations from consultation should be clearly shown in Action Plan at end of document.
For advice and support from Consultation Team click here
We have not undertaken any specific consultation in relation to LLAOL's Airport Master Plan. The airport operator (LLAOL) carried out public consultation between October and November 2020.

2. Impacts Identified
2.1. Where you have identified a positive impact, for communities or staff , please outline how these can be enhanced and maintained against each group identified . Specific actions to be detailed in action plan below.
Guidance Notes: <i>By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?</i>
There is unlikely to be any noticeable impact experienced by people sharing a specific characteristic of the group, and the positive impacts will be applicable to the population in general in the area.
2.2. Where you have identified a negative impact please explain the nature of this impact and why you feel the proposal may be negative. Outline what the consequences will be against each group identified . You will need to identify whether mitigation is available, what it is and how it could be implemented. Specific actions to be detailed in action plan below.
Guidance Notes: <i>By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?</i>
There is unlikely to be any noticeable impact experienced by people sharing a specific characteristic of the group, and the negative impacts will be applicable to the population in general in the area
2.3. Where you have identified a neutral* impact for any group, please explain why you have made this judgement. You need to be confident that you have provided a sufficient explanation to justify this judgement.
Guidance Notes: <i>By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic</i>
There is unlikely to be any noticeable impact experienced by people sharing a specific characteristic of the group, and the neutral impacts will be applicable to the population in general in the area

3. Social & Health Impacts

3.1. If you have identified an impact on community cohesion⁴, tackling poverty⁵ or health and wellbeing⁶, please describe here what this may be and who or where you believe could be affected, **Please also ensure that you consider any possible impacts on Looked After Children.**

Guidance Notes: Please use this section to describe the social and health impacts and detail any specific actions or mitigations in the action plan below.

[For advice & support from the Social Justice Unit click here](#)

[For advice and support from the Public Health team click here](#)

The Airport Master Plan identifies impacts that may arise from the airport operator's intention to increase the passenger throughput to 19mppa.

There is unlikely to be any noticeable impact experienced by people sharing a specific characteristic of the group, and the impacts will be applicable to the population in general in the area.

The social and health impacts are addressed in the environmental impact assessment and planning application which will be considered by the Development Management Committee when they consider any relevant planning application.

In terms of tackling poverty, the original environmental statement from 2012, that informed the expansion to 18mppa, considered amongst other things socio-economic impacts and health impacts. The 2012 environmental statement concluded that there would be substantial benefits in terms of the generation of employment, with very substantial benefits to the local economy, whilst to the wider economy there would be moderate benefits. To the wider community, the contributions to community projects were assessed as of moderate benefit, whilst the creation of new jobs and wealth was considered to have a positive effect on health and wellbeing.

The Council's Business and Investment team indicate that Luton had the seventh highest number of furloughed workers and eighth highest claimant count for cities and large town in the UK, in addition, 33% of workers (32,000) are in at risk sectors of the economy. The Council's Luton 2020-2040 Vision seeks to ensure that everyone in Luton has the opportunity to thrive and no-one has to live in poverty. Securing a strong economic recovery following the impact of Covid-19 is essential to the town and the aviation sector is seen as a key area for growth.

In terms of health and wellbeing, the environmental statement addendum (ESA) that accompanies the planning application for the 19mppa proposal addresses the adverse effects of noise that would arise from the implementation of the Airport Master Plan's intention to expand to 19mppa. The ESA concludes that at the population level the health effects related to noise exposure would be of moderate significance.

⁴ is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

⁵ is the proposal likely to have a noticeable effect on households that are vulnerable to exclusion, e.g. due to poverty, low income and/or in areas of high deprivation

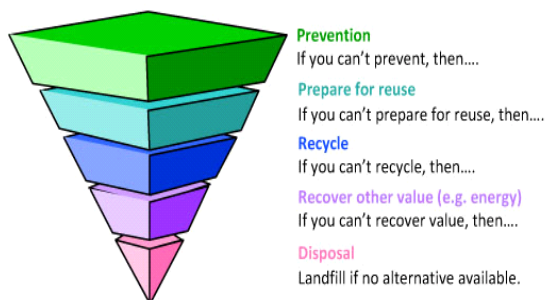
⁶ Is the proposal likely to have a positive or negative impact on health inequalities, the physical or mental health and wellbeing of an individual or group, or on access to health and wellbeing services?

4. Environment Impacts

4.1. If you have identified any impacts related to the built and natural environment⁷, low carbon⁸ and waste minimisation please describe here what this may be and who or where you believe could be affected

Guidance Notes: Is the proposal likely to impact on the waste hierarchy which includes issues shown in the table below:

Waste Hierarchy



[For advice and support from the Strategy & Sustainability Team click here](#)

⁷ Is the proposal likely to Impact on the built and natural environment covers issues such as heritage, parks and open space, cleanliness, design, biodiversity and pollution?

⁸ Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

There is unlikely to be any noticeable impact experienced by people sharing a specific characteristic of the group, and the impacts will be applicable to the population in general in the area.

In terms of the impact upon the built and natural environment, the Airport Master Plan proposes no additional infrastructure at the airport. However, the increase in the number of aircraft movements (around 1,100 in the year) and vehicular movements will have an impact on the built and natural environment. The Airport Master Plan addresses the impact on people and the natural environment in terms of noise, air quality, waste, energy and climate change, ecology and biodiversity, ground and water conditions, and landscape.

Pollution in relation to noise impacts on the local community has been referred to above, whilst the Airport Master Plan concludes that no impact on the wider habitat is expected. With regard to air quality the Airport Master Plan identifies the most significant pollutants as NO₂, PM₁₀s and PM_{2.5}s, but notes that the increases are not significant and the impacts would be negligible. The ESA submitted with the planning application bears this out, with all impacts on human receptors classified as negligible and all impacts on ecological receptors as not significant.

In terms of the low carbon agenda, the Airport Master Plan notes that there is not expected to be a significant increase in energy required associated with the buildings and operation of the airport (scope 1 and 2 emissions). The ESA specifically addresses climate change and greenhouse gas emissions, noting that the main contributors are from transport – surface access and aviation (scope 3) – with a Carbon Reduction Plan being submitted as part of the planning application. The ESA concludes that the magnitude of greenhouse gas emissions from the 19mppa proposal represent less than 3% of the total international aviation emissions for the UK and would have a negligible effect on the ability of the UK to meet its carbon targets. Overall the ESA concludes that on the global climate there will be a minor adverse impact, though this is considered not to be significant.

For waste minimisation, the Airport Master Plan recognises that with an additional 1mppa there will be a minor increase in waste generated, though it noting that waste generated has been reduced, with targets for effective management and recycling being implemented and a site waste management plan accompanies the 19mppa planning application.

5. Economic Impacts

5.1. If you have identified any impacts related to Luton's economy and businesses ⁹, creating jobs¹⁰ or improving skill levels ¹¹, please describe here what this may be and who or where you believe could be affected

Guidance Notes: Please use this section to describe the social impacts and detail any specific actions or mitigations in the action plan below. Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below.

[For advice and support on Economic Development click here](#)

There is unlikely to be any noticeable impact experienced by people sharing a specific characteristic of the group, and the impacts will be applicable to the population in general in the area.

In terms of Luton's economy and businesses, the Airport Master Plan states that London Luton Airport is a key economic driver in the region. The environmental statement submitted with the original application in 2012 provides the baseline for the addendum associated with the 19mppa planning application. Significant socio-economic benefits were identified in the 2012 ES, including the creation of direct and indirect jobs associated with the airport expansion. Whilst the 19mppa application does not entail any material changes to the overall built infrastructure at the airport, the conclusions of the original ES remains valid.

With regard to improving skill levels, the legal agreement in place includes an obligation for LLAOL to commit to the support of a skills training service. It also requires LLAOL to commit to use reasonable endeavours to use local suppliers of goods and services from the local area and other local initiatives.

⁹ Is the proposal likely to impact on Luton's economy and businesses for example by creating an opportunity to trade with the Council, support new business opportunities?

¹⁰ Is the proposal likely to impact on the creation of new jobs in the local economy? This will also link to health and well-being and the reduction of poverty in the social box.

¹¹ There are significant skills gaps in Luton's economy. Is the proposal likely to create opportunities for up skilling the workforce or to create apprenticeships?

Impact Enhancement and Mitigation

Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below:

Action	Deadline	Responsible Officer	Intended Outcome	Date Completed / Ongoing
19mppa planning application to be reported to Development Management Committee (proposed conditions and s106 legal agreement)	Subject to planning conditions and legal agreement	Sunil Sahadevan	Should planning permission be granted there would be planning conditions imposed to ensure monitoring and management of the activities, together with a legal agreement to secure the socio-economic benefits and appropriate mitigation/compensation for adverse impacts of noise on local communities.	

A review of the action plan will be prompted 6 months after the date of completion of this IIA.

Key Contacts

Name	Position
Sunil Sahadevan	Head of Planning

Next Steps

- All Executive Reports, where relevant, must have an IIA attached
- All report authors must complete the IIA section of Executive Reports (equalities, cohesion, inclusion, health, economic, business and environment)
- All reports are to be forwarded to the Social Justice Unit, Legal Department, Public Health and Strategy & Sustainability Unit for sign off in time for Executive deadline
- On the rare occasion that the Social Justice Unit are unable to sign off the report, e.g. recommendations are in breach of legislation, a statement will be submitted by Social Justice Unit Manager or Equality and Diversity Policy Manager

Completed and signed IIA's will be published on the internet once the democratic process is complete

Useful Documents

[Corporate Plan](#)

<http://intranet/SupportServices/Document%20library/LBC-corporate-plan.pdf>

[Equality Charter](#)

https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Social%20Justice/Equality%20Charter.pdf

[Social Justice Framework](#)

[Joint Strategic Needs Assessment \(JSNA\)](#)