



## **CPRE Bedfordshire and CPRE Hertfordshire joint response to the Application by London Luton Airport Limited for an Order Granting Development Consent for the London Luton Airport Expansion project.**

### **1. Introduction**

- 1.1 This submission is made by CPRE Bedfordshire and CPRE Hertfordshire – the Countryside Charity. We are locally based charities and part of the national CPRE network. We work to protect, promote and enhance our urban greenspaces and countryside in Bedfordshire and Hertfordshire to make them better places to live, work and enjoy. Our aim is to ensure the countryside is protected for current and future generations.
- 1.2 We are active across both Counties campaigning against inappropriate development, encouraging sustainable new development in the right locations and providing help and support to local Action Groups.

#### **CPRE Bedfordshire and Hertfordshire position: -**

- 1.3 The joint CPREs continue to oppose strongly the proposal to expand Luton Airport from 18 million to 32 million passengers per annum. Our objections are based on matters of both principle and detailed points of concern as noted in the remainder of this submission.
- 1.4 CPRE Hertfordshire was a Rule 6 party to the planning inquiry for the variation of conditions on which a decision has not been made. Their submission covered many similar issues which are directly relevant to this determination.
- 1.5 There is no substantive difference between the present and the previous 2022 and 2019 proposals despite Luton Rising's assertions that significant changes have been made. In essence, the scale of the expansion proposals and their impacts are similar and have in fact become more damaging with the changing circumstances.
- 1.6 In these times of Global Climate Change and Climate Emergency it is inconceivable that such an environmentally damaging and purely profit driven proposal should be even seriously considered.

## 1.7 Our main areas of concern are: -

- **Landscape and countryside:** The proposals will result in significant and irreversible harm to the immediate countryside and beyond. This includes the Chilterns AONB and the Green Belt. In addition, there will be a loss of open space and recreational areas and irreparable damage to Wigmore Park. The increased apron, car parking and airport activity will bring additional light pollution to a wide area of countryside.
- **Climate Emergency:** The proposals flagrantly ignore the reality of the Climate Emergency and the impacts of rapidly expanding aviation, the fastest growing source of Green House Gas (GHG) emissions. A 60% increase in flights will result in hugely increased emissions and there is no guarantee that these can be reduced to meet the Government's commitments.
- **Noise and Air Pollution:** The expansion will cause substantive and further harm to the surrounding countryside and towns by increased noise and air pollution. Further adverse noise impacts are inevitable and underestimated in the submission documents.
- **Traffic:** Significant congestion will be caused by increases in traffic at the site and on approach roads. More road building is proposed, as well as the provision of an additional 7,275 parking spaces. The effects on the local road network are greatly underestimated. The whole approach lacks the required emphasis on sustainable transport and detail of how a significant modal shift to public transport will be achieved.
- **Economic Forecasts:** The economic benefits of the scheme are greatly overestimated and do not justify the harm.

## 2. **Landscape, loss of countryside and open space**

### Impact on surrounding Countryside and the Chilterns AONB

- 2.1 There will be significant harm to the surrounding countryside in terms of the changing character brought about the expansion plans, as well as the loss of open landscape, further incursion into the Green Belt and light pollution. The major expansion of the footprint of development with new buildings, the extended apron for aircraft movement, the new terminal buildings and 7,275 additional parking spaces will encroach on existing greenfield areas to the east of the airport.
- 2.2 The National Planning Policy Framework (NPPF) contains robust requirements in respect of designated protected areas such as The Chilterns Area of Outstanding Natural Beauty (AONB). This AONB is already significantly affected by aircraft movements in terms of noise and visual amenity which will increase with the application proposals.
- 2.3 Paragraph 174 of the NPPF states:
  - “planning decisions should contribute to an enhance the natural and local environment by:
  - a) protecting and enhancing valued landscapes
  - b) recognising the intrinsic character and beauty of the countryside ...

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of ... noise pollution... Development should wherever possible help to improve local environmental conditions such as air quality...”.

2.4 Paragraph 176 continues to state:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The scale and extent of development within ... their setting should be sensitively ... designed to avoid or minimise impacts on the designated areas ...

2.5 Paragraph 185 states:

“Planning ... decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse effects on health and quality of life
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”

2.6 In addition, Luton’s adopted Local Plan policy LLP6 – London Luton Airport Strategic Allocation, under the heading ‘Airport Expansion’ states:

2.7 “Proposals for development will only be supported where the following criteria are met; ... iv. they fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or the local environment (in terms of noise, disturbance, air quality and climate change impacts) ... v. achieve further noise reduction or no material increase in day or night time noise or otherwise cause excessive noise including ground noise at any time in the day or night and in accordance with the airport’s most recent Airport Noise Action Plan.”

2.8 The Chilterns AONB lies less than three miles from Luton Airport and the AONB and its setting lie underneath the final approach to the runway. Natural England’s current Designations Programme, announced in June 2021 includes a proposal to extend the designated area of the Chilterns AONB to include land to the south and east of Luton in the vicinity of the airport.

2.9 The emerging North Herts Local Plan also includes proposals to extend the Green Belt west of Stevenage which lies beneath the approach to the Luton Airport runway.

2.10 Para 14.3.1 and 14.3.2 of the applicants Environmental Statement chapter 14 states very clearly that: - “The Proposed Development would impact on the existing landscape character during both construction and operation” and “The increase in aircraft movements is also assessed to result in a significant adverse effect on the aesthetic and perceptual characteristics of the landscape within the Chilterns AONB.

- 2.11 A key requirement of national planning policy regarding designated protected areas is the expectation of tranquil enjoyment, as noted above. In addition to noise impacts, there is significant visual intrusion of aircraft, often several visible at once from the AONB and its setting. The combination of aural and visual intrusion and associated sense of activity deprives much of the AONB of the sense of tranquillity which it deserves as a nationally protected area.
- 2.12 The proposals therefore contravene both National policy and Local Plan Policy LLP6 with regard to the impacts on rural settlements and the local environment.

#### Wigmore Park

- 2.13 The joint CPREs object to the inclusion of Wigmore Park in the development. Wigmore Park as an open space was gifted to local residents in compensation for the loss of green space to residential building.
- 2.14 It is a long-established park and nature reserve and has evolved into an integrated and mature habitat, with a developing and varied ecology including thousands of orchids, bees, butterflies and over 60 bird species. Wigmore Park has achieved County Wildlife Site status, received public recognition and awards and is listed as an Asset of Community Value.
- 2.15 The Park enjoys wide support as a popular and much-loved recreational space for the local community and acts as a noise, pollution and visual buffer between the eastern end of the Airport runway and the residential area less than a mile to the north. It deserves special treatment as an Asset of Community Value and as a buffer to Airport operations.
- 2.16 The Park is an important element of the commitments made in the Luton Local Plan to mitigate and reduce over time the noise and amenity impacts of the Airport. Notwithstanding concerns relating to the nature of the relationship between Luton Council and Luton Rising which have been raised previously by others, the proposals to 'replace' the area intended for use by the Airport with additional land are both inadequate and inappropriate.
- 2.17 The replacement land does not make up for the loss of a mature, ecologically rich and highly valued landscape. The new area will take years to mature, would no longer be located within easy access of residents and would not act as the buffer to the airport as originally intended. We strongly oppose the inclusion of Wigmore Park and destruction of this important and unique green area and habitats.

### **3. Climate emergency**

- 3.1 The expansion proposals and Needs Case flagrantly ignore the reality of the climate emergency and the impacts of rapidly expanding aviation, the fastest growing source of green-house gas (GHG) emissions. The joint CPREs are concerned that an increase in capacity for Luton Airport is inappropriate in terms of the increasing debate on the future of air travel, and its continued expansion.
- 3.2 Notwithstanding the technical advances with regard to noise and fuel economy, these will not be sufficient to ameliorate the damage caused by planned increases in air travel. The

work of the Intergovernmental Panel on Climate Change (IPCC) in 2018 underlined how, despite current efforts, we are on course for more than two degrees Centigrade warming above pre-industrial levels and the catastrophic consequences this would entail.

- 3.3 The IPCC highlighted an urgent need to halve GHG emissions within the next ten years and the UK Parliament and many local councils, including those of Bedfordshire and Hertfordshire have declared climate emergencies. The UK Government has adopted a zero-carbon target for emissions by 2050 with many proposals by political and environmental organisations, including CPRE, for this to be accelerated. The UK Government recognised in their Jet Zero strategy document 2022 that “At current rates, aviation is expected to become one of the largest emitting sectors by 2050.”
- 3.4 The same document details the Government’s commitments to achieving decarbonisation targets of:-
- 2050 for net zero overall,
  - domestic flights to achieve net zero by 2040 and
  - for all airport operations in England to be zero emission by the same year.
- 3.5 These targets are however dependent on development and adoption of new technologies and working practices – which are still “work in progress” with no guarantees they will achieve the desired carbon reductions. The Government does recognise this, and state in the Jet Zero Strategy: “We recognise that many of the technologies needed to decarbonise the sector are at an early stage of development and therefore this approach is essential to allow new technology to be developed, tested and adopted across the industry.”
- 3.6 Despite the Government’s own Climate Change Committee recommending in June 2022 that the Government “Implement a policy to manage aviation demand as soon as possible so the mechanisms are in place in the likely event that low emission technology are not commercially available to meet the Government’s aviation pathway. The demand strategy should include a commitment to preventing any net airport expansion.” No action has been taken on this.
- 3.7 The proposed growth of air traffic at Luton Airport represents a 60% increase in flights which will result in a massive increase in GHG emissions. This is neither “sustainable growth” nor “sustainable development”. Para 4.1.1 of the Environmental Statement Appendix 12.1 states that:  
“Based on the GHG assessment reported in Chapter 12 of the ES [TR020001/APP/5.01], aviation contributes 83.4% of the overall GHG emissions of the Proposed Development. Most aviation emissions are outside the direct control of the airport.”
- 3.8 Reducing the GHG emissions on aviation movements is therefore fundamental. The assumptions Luton Rising use to demonstrate how they will do this are based on the implementation of as yet untried and tested new technologies and are therefore fundamentally unsound.
- 3.9 The proposals also breach the requirements of the National Planning Policy Framework (NPPF). The NPPF is clear that there are three overarching objectives for sustainable development. Paragraph 8 notes:

“c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”

3.10 Further, the NPPF states that the environmental impacts of transport infrastructure should be taken into account. Paragraph 104 notes:

“Transport issues should be considered from the earliest stages of development proposals, so that...

c)the environmental impacts of the transport infrastructure can be identified, assessed and taken into account... including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains...”

3.11 Climate change targets for all kinds of economic and social activity are now enshrined in legislation and these are stringent and will not be easy to achieve. Together with proposals for Heathrow, Gatwick and Stansted Airports, there is a cumulative impact which requires urgent consideration for London and the southeast and eastern regions.

3.12 Continued planning for airport expansion in southeast England as a whole is wholly inappropriate in the climate change emergency, as declared by Luton Borough Council and many other local authorities throughout the United Kingdom. Quite simply, any increase in the number of planes will make it substantially harder to meet net zero given that current programmes are highly unlikely to deliver net zero.

#### **4. Noise and Air pollution**

4.1 It is inevitable that noise pollution will increase with the proposed expansion and the impacts are underestimated in this application. Luton Airport is a site located within a tightly packed series of large towns and cities that are already adversely impacted by noise including Luton, Bedford, Biggleswade and Sandy in Bedfordshire as well as Hemel Hempstead, Harpenden, St Albans and Stevenage in Hertfordshire.

4.2 Areas of countryside in Bedfordshire, Hertfordshire, Buckinghamshire and Cambridgeshire already experience a loss of tranquillity on account of the airflight paths as identified in the London Luton Airport Annual Monitoring Report 2021. The nature of the noise, in terms of frequent apparently random short bursts of up to 20 seconds where the ambient noise level is generally low exacerbates the impact. The recent changes to the flight paths and new holding stack for the Airport in Cambridgeshire also result in aircraft flying over communities that have previously enjoyed relative tranquillity blighting both rural areas, communities and areas currently allocated for housing expansion such as Biggleswade.

4.3 It is accepted that, since 2017, the approved noise contours have been exceeded by Luton Airport and the Council has failed in its duty of enforcement. The absence of noise is an integral element to maintaining tranquillity, and beautiful scenery does not compensate for the intrusion of artificial noise.

4.4 The proposals are also not compatible with the provisions of Luton Local Plan Policy LLP6, which even though it was redrawn to be more favourable to airport growth, states that

expansion proposals should 'Include proposals which will over time result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents and occupiers and users of sensitive premises in the area, through measures to be taken to secure fleet modernisation or otherwise.

- 4.5 The impact of noise from the Airport is therefore already widespread and a 60% increase in flights, will inevitably massively increase the impact of noise and spread the damage to health over an even wider area. The noise modelling/forecasting for the proposals relies on assumptions made about the use of quieter 'next generation' aircraft; a different fleet mix, incorporating larger aircraft, and working with the National Air Traffic Service to reduce holding delays at and near the airport.
- 4.6 However, these are all outside of the control of Luton Rising. Promises on the replacement of current aircraft fleets with less-noisy modern variants have not, and cannot, be kept by Luton Rising. Although some newer aircraft variants have appeared at Luton, the current picture is of predominantly older types of aircraft, and newer models do not always fulfil claims of lower noise levels on landing.
- 4.7 Therefore, the noise and air quality projections made in the documents are fundamentally flawed and should be revised to include other potential, less optimistic scenarios.

## **5. Air quality**

- 5.1 Luton Rising states that the future use of newer generation aircraft, together with more efficient and electric road vehicles will reduce emissions in the future. Luton Rising's air quality assessment, like the noise assessment, therefore, places significant reliance on these assumptions. However, as with the noise forecasting mentioned above, Luton Rising is not in a position to guarantee that the uptake of the newer generation aircraft and/or the use of more electric vehicles generally will be achieved as forecasted.
- 5.2 The air quality and pollution forecasting for the proposal therefore suffers from the same potential inaccuracies as the noise forecasts and modelling. Traffic to the airport also passes through a number of Air Quality Management Areas including Luton, Hitchin, Dunstable and St Albans and expansion will result in further harm to localised problems of air quality.
- 5.3 It is not possible to conclude that the proposals can be achieved without significant noise and pollution impacts, or that these impacts can be suitably controlled, as is required by national aviation and local planning policy.

## **6. Traffic**

- 6.1 We note that the Applicant has not yet been able to update their traffic modelling to comply with recent Government guidance on post Covid assumptions. This has knock-on implications for a number of other studies and assumptions and we are unclear why it is considered acceptable to proceed with considering and determining the application whilst this is still outstanding

- 6.2 The surface access to and from the airport is a key issue in the consideration of the proposals. Luton Airport's public transport links are already inadequate, and the airport has one of the lowest levels of public transport use of any airport in the London region.
- 6.3 The DART service connection has now opened from Luton Airport Parkway on the London Midland Line, but there will still be no direct rail service to the airport from London as this necessitates a change at Luton Parkway. The area lacks good public transport east to west as bus services are poor and east-west railway routes were lost back in the 1960's.
- 6.4 The predicted increase in the use of public transport to 45% and subsequent reduction in the proportion of car-based arrivals and departures is of course welcomed. However, the existing Midlands Mainline already has capacity and congestion issues and the success of Luton DART, will depend on its usability, frequency and acceptance of its fares.
- 6.5 No evidence has been provided to demonstrate how and why the DART and the other limited coach and bus proposals will achieve the change in public transport usage. There needs to be far greater investment in a wider network of sustainable transport modes if the proposed targets of reducing car borne trips is to be achieved or improved. CPRE advocates, regardless of any expansion plans, a much more ambitious target of road traffic reduction.
- 6.6 40,000 more passengers a day and the proposed additional 7,275 car parking spaces will generate more private car use, congestion and more GHG emissions. The road network will inevitably be inadequate and congested, and this will lead to further pressures for road building around the site and into nearby countryside.

## **7 Economic forecasting**

- 7.1 With regard to the demand for aviation, the joint CPREs would point to 'flight free' campaigns and evidence that people and organisations are questioning their need to fly more than ever. Sustainable strategies for air travel should align with land use planning strategies in reducing the need to travel and the costs and benefits of flying should be reassessed in the context of the climate emergency.
- 7.2 The Need Case makes much of the importance of the proposed Ox Cam Arc. In particular how this Government backed growth strategy will result in an increase in usage of the airport and how the airport expansion will play an important role in achieving the Arc's growth objectives. However, the Arc has now been relegated from a Government to Regionally led initiative, the proposed expressway has been cancelled and future long term funding sources are unclear. The reliance and importance the Needs Case places on this initiative is therefore ill founded.
- 7.3 Future growth should not be seen as inevitable, and the demand forecasts underpinning this proposal will be affected by national and international policy, approaches to economic growth which can influence demand as well as local changes to commercial activity. This is particularly relevant when specific developments, such as this proposal, have major environmental impacts which reduce living and working conditions for huge number of people.



- 7.4 The forecast of 12,000 new jobs as a result of airport expansion is considered highly unreliable. There is no linear relationship between growth and local jobs and employment claims are routinely over-stated by development promoters.
- 7.5 Over the period 2010 to 2018, passengers through Luton Airport increased by 90% (8.7 million passengers per year to 16.6 million) but directly employed jobs, a proportion of which are part-time, increased by only 26% (8,200 to 10,400). This was significantly below the previous forecast benefits. When the second runway at Manchester was proposed, the promised 55,000 jobs were subsequently reassessed to be less than 6,000.
- 7.6 A previous statement by Oxford Economics Forecasting (PEIR, Vol 3, Appendix 13-1, para 1.2) in the 2019 consultation, stated that ‘we estimate and forecast the economic contribution of London Luton Airport, but we do not make any assessment of the extent to which the contribution identified will be additional to what would have occurred in the absence of its future development’. This suggests that much of the forecast economic growth may happen regardless and independent of the proposals.
- 7.7 The airport expansion will add to the tourist spending deficit. This takes spending and economic activity out of the country, and in the absence of expansion more of the tourist spend would remain within the domestic economy. No account of this effect is made within the application and a more sustainable alternative strategy would limit overall numbers travelling, retaining local spend, creating more work and employment without accelerating climate change.
- 7.8 Luton Council has relied for too long on the Airport as an income generator and employment hub. It needs to spend time, effort and money on looking at how to diversify the local economy and reduce its financial dependence on the success or otherwise of the Airport. The Council has invested massively in the Airport borrowing millions of pounds to underpin its viability and profitability. This is not a role or risk a Local Authority should take prejudicing its ability to deliver local services which is what it is there to do.

## **8. Conclusion**

- 8.1 The joint CPREs strongly oppose the proposed expansion of Luton Airport. The growth proposals are ill founded, not suitably evidenced and completely ignore the current climate crisis.
- 8.2 Luton Rising should focus on working within its current financial and operational parameters and deal with the inadequacies of its response to existing operations. There is no reasonable case for expansion and this application should be refused.

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