

The National Trust wishes to register as an interested party in respect of the application for a Development Consent Order for the Luton Airport Expansion (also known as Luton Rising).

The National Trust owns a number of properties and sites within a 15km radius of Luton Airport, stretching across Bedfordshire, parts of Hertfordshire and into Buckinghamshire and much of this land is designated for its landscape and biodiversity importance. The Trust's principal landholdings include the following properties:

- Ashridge Estate and Ivinghoe Beacon
- Dunstable Downs
- Chilterns Gateway
- Whipsnade Estate - Coombe Hill/Low Scrubs Pulpit Hill
- Smithcombe, Sharpenhoe and Sundon Hills

The largest of these is the Ashridge Estate which comprises some 5000 acres of countryside, including ancient woodlands and commons. Dunstable Downs is the highest point in Bedfordshire and Dunstable and Whipsnade Downs, Ivinghoe Hills, Ashridge Commons and Woods are all designated SSSIs and all five landholdings lie within the Chilterns AONB. Ashridge Estate also includes Pitstone Hill, Alpine Meadow and Little Heath Pit SSSIs. Parts of both Coombe Hill and Pulpit Hill are also designated SSSIs. A large part of the Ashridge Estate is also part of the designated Chilterns Beechwoods SAC. These sites in the context of the DCO proposal are identified within the map provided at **Appendix 1** of this document.

The Trust also owns, leases and manages land at Smithcombe, Sharpenhoe and Sundon Hills SSSI to the north of Luton and at Totternhoe Knolls SSSI to the west of Dunstable.

Together, these special places offer access to miles of footpaths with expansive views across the Vale of Aylesbury and are home to sensitive and rare species of flora and fauna. The Trust is committed to the protection of these spaces, and to the quality of experience they offer to visitors.

The proposed expansion of Luton Airport seeks to increase the capacity of the airport from 18million passengers per annum (mppa) to 32mppa, facilitated through the construction of a new passenger terminal and additional aircraft stands to the north-east of the runway, alongside the existing infrastructure and supporting facilities to be improved in line with incremental growth in capacity of the airport. It is understood that the increase in capacity could result in the increase in the number of planes and frequency of flight paths used to deliver this increase in air travel capacity to Luton Airport.

As it currently stands, the Trust has these two outstanding concerns, which are expanded on in further detail in the Principal Areas of Disagreement Summary Statement (PADSS) provided at **Appendix 2** of this document. The National Trust therefore objects to the proposed DCO due to:

- The impact of the noise pollution caused by the DCO proposals on the tranquillity of the many National Trust sites within the vicinity of the proposed airport expansion; and
- The impact of the air pollution caused by the DCO proposals on the ecological condition of the ecologically important and designated sites owned and managed by the National Trust located within the vicinity of the proposed airport expansion.

Noise impact

Through excluding the National Trust's sites in the assessment of the noise impact of the proposed development, we raise concerns that the existing noise impact will be exacerbated as a result of an increased number of planes using the flight path which passes over these

sites at 7,000ft and below. Noise monitoring has not been undertaken at the National Trust's sites however there is often audible air noise from planes within the National Trust sites and it is noted that the Examining Authority (Planning Inspectorate) undertook a number of unaccompanied site visits in late May to include visits to Ashridge Estate and Ivinghoe Beacon where air noise was noted. It is therefore considered that there is a need for noise monitoring at this location, and other National Trust sites which lie within the vicinity of the existing airport and on the flight path, to establish the impact of the expansion and identify any necessary mitigation required.

With regards to the perceived impact of the development, there is already an existing impact from air noise and Luton Airport on the tranquillity of National Trust sites, which are important sites for recreation. There is therefore an expectation that the proposed development would increase that impact on tranquillity. The National Trust object to the impact that the proposals would have upon tranquillity. Whilst reference is made to aeronautical technology advances, these are theoretical and an assessment of the proposals in respect of existing noise levels should be undertaken. Where an adverse impact is identified on National Trust sites, consideration should be made in respect of whether the proposals are appropriate and whether there is the need for mitigation.

Air Quality

The proposed development seeks to incorporate the use of the Airport Access Road (AAR) to provide routes for road traffic away from sensitive receptors in relation to the operation of the proposed airport expansion. Without assessing the full complement of sites to include the identified National Trust sites in relation to routes to the AAR, it is not clear what the impact of the proposed development would be and by excluding these sites, it may result in traffic being redirected towards routes in closer proximity to ecologically important designated sites which are sensitive to vehicle emissions, and this could have an adverse impact on these designations. Accordingly, we are of the view that this needs to be considered in respect of the impact that the development could have upon National Trust sites.

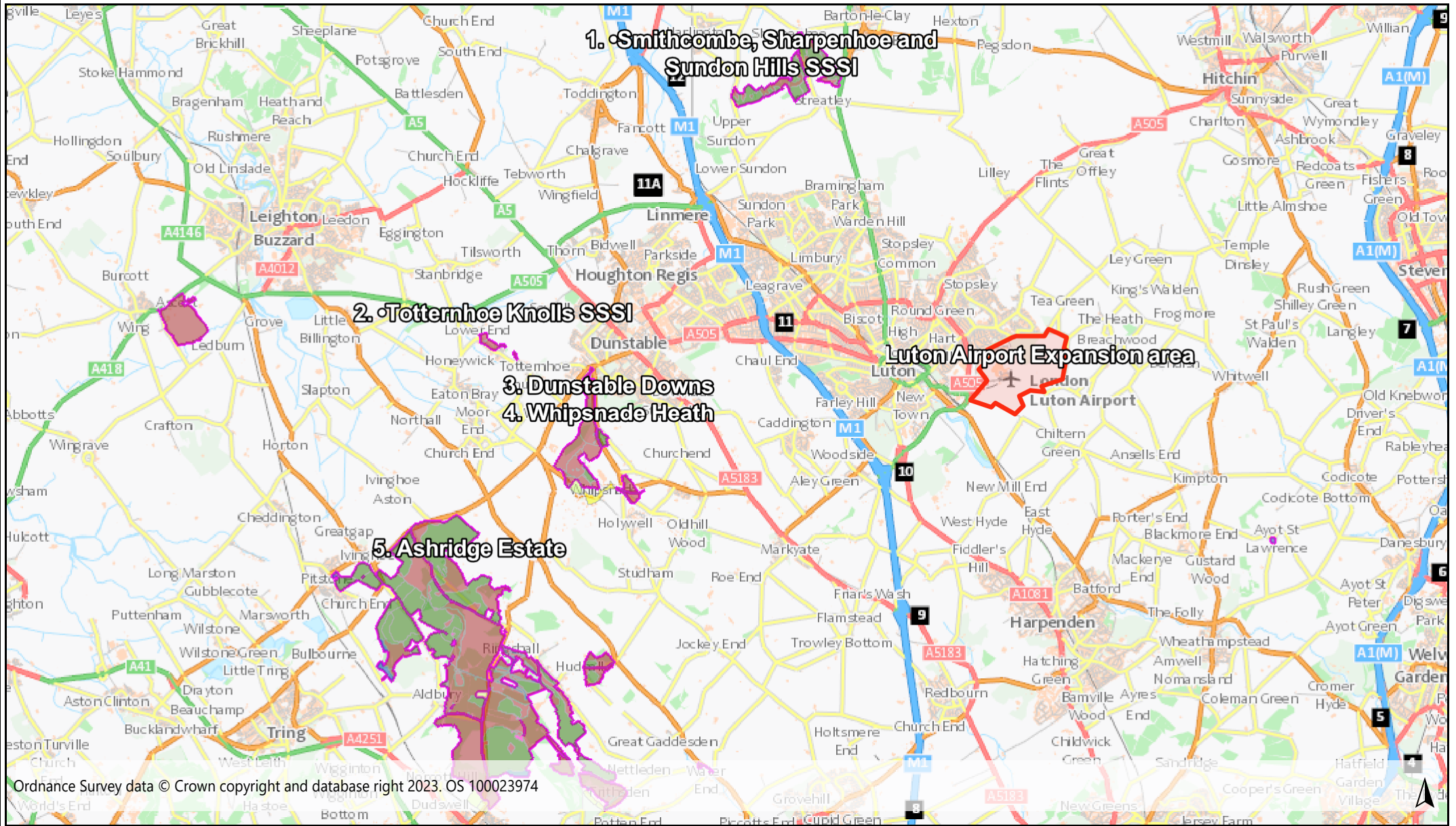
Whilst there have been assumptions made that aircrafts will become more efficient and result in low emission or zero emission planes, we consider that should the use of low emission or zero emission aircraft be delayed or be considered unviable, an assessment of the current level of emissions should be undertaken to take account of impact on ecologically sensitive sites, to include identified National Trust sites.

Whilst impact on ecological designations and biodiversity has been considered within the DCO, this does not include indirect impact by virtue of an increased use of the flight path across National Trust sites (specifically Ashridge Estates where planes frequently fly at an altitude of 7,000ft or below) and / or the use of the flight path by larger planes carrying greater numbers of passengers. The lack of assessment in this context is concerning with regards to any adverse impact that could be experienced on these ecologically important designations.

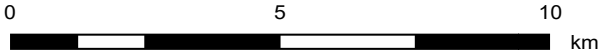
These matters will be expanded upon in our Written Representation in due course.



National Trust | NT sites within 15km of Luton Airport Expansion



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Scale 1: 140000 (when printed at 100% on A4 landscape)

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

Notes