



# Slip End Parish Council

9<sup>th</sup> December 2019.

We thank you for the opportunity to comment on the future plans for the expansion of Luton Airport to 2039. We understand that further expansion is inevitable (although economic and environmental constraints make your target of 32 mppa and 52 traffic movements by 2039 highly unlikely), but, as a parish council, we have serious concerns about your proposals.

By way of background Slip End parish comprises the village of Slip End and the outlying hamlets of Woodside, Aley Green and Pepperstock. Slip End village is 3.8 km from the LLA runway, a mere 10 minutes drive away, and all of the westerly FP26 flight paths pass between Slip End and Pepperstock within the 57 db noise contour and at around 3200' depending on weather conditions, and certainly within the LOAEL of 4000' used in the study (PEIR Vol 1 9.6.2). Woodside is impacted by flight path FP08 arrivals from the west, also within 57db. Clearly noise, emissions and traffic are issues which impact upon the parish.

A major concern with the consultation documents is the lack of any presentation or analysis of the impacts of doubling passengers over the expansion decade 2009-2019. We are being presented with the **present** or **near-present** (2017 in the case of aircraft noise) as the baseline for environmental analysis (for example, section 5.4 of the PIER Vol 1 study). This gives the impression that everything is fine and we can just plan ahead – a clever but dishonest approach. The PEIR evaluation claims to have analysed the environmental data for past noise and emissions, so surely we should have the right to access and consider this.

Obviously every additional aircraft movement adds to the sum of noise and emissions, even if they are new generation planes like the 320neo. Current daytime movements are around 27ph, to be doubled under the current plan. Night flights for 2019 Q2 are 5% up on last year (<https://www.london-luton.co.uk/LondonLuton/files/81/81194466-f4d8-4fa5-9335-1da64b2152da.pdf>) whilst 'shoulder' movements (between 0550 and 0700), which are essentially rebranded night time flights, are also on the increase.

In this context there is concern about the introduction of wide-bodied jets such as the Boeing 787. LLAL has admitted an intention to explore the medium distance market, but has been disinclined to quantify this proposed growth. Our experience of the 787 so far is that it has a slower climb rate and is much noisier than the short-haul aircraft at around 3000 feet. We would be grateful for transparency on this issue. Due to physical constraints the changes envisaged in the flight path review Aviation 2050 are unlikely to affect the first stages of FP08 and FP26, despite the optimism of the consultancy document (p149).

We are also concerned about the emissions monitoring strategy, which is heavily reliant on the new fixed monitoring station at Wigmore, operative since June this year, and roving data collection for a limited range of variables. Given that 70% of aircraft takeoffs are westerly over the course of the year, it is a major oversight to not monitor emissions west of the airport. The nearest fixed monitoring station for particulate matter (PM10/PM2.5) and CO2 is in Berkhamstead, 18km to the southwest of the runway. This means there is no western data available for the 15x15 sq km sample grid employed in your study (PEIR vol 5.6.2).

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Clerk: P Segal

It would therefore be reassuring if LLAL were to monitor for NOx, CO2 and particulates in villages close to the runway to ensure we are not a hotspot.

In the last two years the parish has experienced rapid growth in the practice of 'flyparking' by airport customers, and in some cases, by employees. The attraction lies in its proximity to the airport, and, of course, it is free. Your proposed parking strategy does nothing to alleviate this problem. We are in discussions with Airparks Ltd to restrict use of the Airparks courtesy bus service to Airparks customers and parish residents, but this is unlikely to completely solve the issue, and it is likely that we will have to introduce, regretfully, parking restrictions in the parish at some point. We note that your FIRST scheme intends to offer compensation to communities on a passenger number basis up to a figure of c£10-15k. This is unlikely to meet the costs of traffic enforcement, and we suggest that LLAL funds this separately and directly.

The parish also has a number of properties which should be eligible for the Noise Insulation Scheme 3. However, as there are differences between the 2017 baseline data and the projected noise envelope for 2029 (PEIR vol 2) a statement of the methodology that will be used to identify qualifying properties is essential.

It is apparent to all of us that use Luton Airport that the infrastructure is barely coping at the present time as a result of development faster than planned in the 2009-2019 period. We are now being asked to approve a further growth-at-all-costs policy, based on potentially flawed economic predictions, which is likely to have profound negative impacts on the quality of life in Slip End parish. This we are unable to do.

Yours truly

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# Slip End Parish Council

12<sup>th</sup> February 2021.

We, Slip End Parish Council, write in response to planning application 21/00031/VARCON of January 2021 to raise a number of concerns.

We have a long engagement with LLA expansion plans, including the LLAL 2039 consultation of 2019 and the Luton Airport Expansion plan (19 mppa) of 2020. We note with some concern that the Slip End Parish Council is not listed in the Wider Council stakeholder list at the end of the LLA – 19mppa Consultation Summary Report (LLA19CSR). Whether this is a clerical error or a lack of interest in our opinion we know not. To remedy this deficiency we attach copies of our responses to both consultations – both are relevant to the present planning application in that environmental and economic concerns about airport expansion are the same whether the target numbers are 19mppa in 2021 or 32mppa in 2035.

The LLA19CSR report comprehensively summarises the environmental and economic objections to raising the passenger limit to 19mppa, to such an extent that we are surprised that LLA wish to ignore it and proceed with yet another planning proposal. Many of our concerns are covered by the report, others are not (see attached letters). Rather than cover old ground we suggest that LLA19CSR substantially represents our view point and move on to consider the proposed changes:

We object to the proposed change to Condition 8 of 15/00950/VARCON to raise the annual passenger cap from 18mppa to 19mppa. The objections raised in LLA19CSR to growth are comprehensive and should be addressed first. In particular the claims that reaching 18mppa 9 years ahead of target is a great achievement should be withdrawn by LLA. It is apparent that the infrastructure which sustained this growth is inadequate and should be improved first. The fall in aircraft movements during covid-19 offers the opportunity to do this.

We object to the proposed change to Condition 10 of 15/00950/VARCON to ease noise restrictions. LLA has a poor record in enforcing noise limits, particularly for night and shoulder sectors. The reason given for easing limits is that new generation aircraft are not coming on line as quickly as originally projected. We would point out that the noise reductions from new generation planes have been less than anticipated, Covid-19 will delay fleet modernization yet further, and that LLA has persistently refused to provide growth projections for mid-haul routes using wide-bodied jets. Flights of this type are slower and noisier on take off, and have increased substantially in the last couple of years (ie the Luton-Tel Aviv route), which impacts greatly on communities, such as Slip End, which are located directly under the flight path. This is particularly ominous given EIA vol 2 suggests the use of 'larger aircraft' will mitigate the increase in passenger numbers (section 3.3.10). We suggest LLA should focus on being the 'good neighbour' it claims to be, and address current shortfalls in noise mitigation.

We are also disappointed that proposed changes to Condition 22 (Car parking management) and Condition 24 (Travel plan) contain no details or proposals whatsoever. 'Fly-parking' in surrounding communities seems to be an issue that LLA refuses to engage with.

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Overall, in these times of economic uncertainty and massive downturn in the aviation industry, there is no case for ANY expansion in LLA capability – 92% of respondents summarized in LLA19CSR (section 5.10) believe there will be no economic growth resulting from such an expansion. Yet LLA persists in promoting this vanity project whilst ignoring the very consultancy documents it commissioned. We therefore strongly object to planning proposal 21/00031/VAR.

Yours faithfully

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