

October 2023

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination) 8.55 Applicant's response to Deadline 2 submissions (Written Representations) Appendix B - Flamstead Parish Council

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.55



The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

London Luton Airport Expansion Development Consent Order 202x

8.55 APPLICANT'S RESPONSE TO DEADLINE 2 SUBMISSIONS (WRITTEN REPRESENTATIONS) APPENDIX B – FLAMSTEAD PARISH COUNCIL

Regulation number:	Deadline 3
Planning Inspectorate Scheme Reference:	TR020001
Document Reference:	TR020001/APP/8.55
Author:	Luton Rising

Version	Date	Status of Version	
Issue 1	October 2023	Additional Submission - Deadline 3	

Contents

Page

1

Appendix B - Flamstead Parish Council [REP2-053]

Tables

Table B1.1: Applicant's Response to Deadline 2 submissions (Written Representations)

Appendix B - Flamstead Parish Council [REP2-053]

Table B1.1 Applicant's Response to Deadline 2 submissions (Written Representations)

I.D	Response Topic	Written Representation (verbatim)	Luton Rising's Response
1	Surface Access	Flamstead Parish lays at junction 9 of the M1. Between Junction 6a and Junction 10 on a daily basis the M1 between these junctions at peak travel times is at best travelling at low speeds due to the shear weight of traffic, when we have numerous closures of the M1 either due to RTCs or overnight roadworks. During these times of closure, Flamstead in particular, due to the proximity of the M1, becomes a cut through for cars and lorries a like travelling from north or south to jump junctions. Our country lanes are not suitable for large vehicles or the amount of traffic diverting from the M1 at these times. This has a detrimental effect on our quiet village. And local residents everyday lives.	 Whilst the Applicant has no control over Road Traffic Collisions (RTCs) or M1 closures, a comprehensive package of highway improvement measures is proposed within Appendix A of the Transport Assessment [APP-200] along the A1081 New Airport Way corridor, together with capacity improvements at M1 Junction 10 and other off-site locations. These improvements are designed to reduce congestion on the M1 and help improve traffic flows to and from Luton. The Applicant will work with local authorities post submission of the DCO application in delivering the highway mitigation schemes identified, and the need for the mitigation will be monitored as part of the Transport Related Impacts Mitigation Monitoring Approach (TRIMMA). Chapter 10 of the Transport Assessment [APP-205] sets out the results of the traffic modelling for the various off-site junctions which are improved, with Table 10.136 providing a comparison of the 'without development' and 'with development' scenarios at Assessment Phase 2b.

I.D	Response Topic	Written Representation (verbatim)	Luton Rising's Response
			Chapter 14.3 of the Transport Assessment [APP-206] also includes a sensitivity test, which assumes that no capacity upgrade would be provided along the M1 corridor. This test demonstrated that in the 2043 future baseline 'without development' scenario, there would be diversion of vehicles from the M1 corridor onto local roads. However, when comparing the 2043 future baseline 'without development' against Assessment Phase 2b 'with development' scenarios, the test concluded that the proposed mitigation included at M1 J10 would bring traffic back onto the M1 corridor, reducing the volumes of traffic using local routes between J9 and J10.
2	Surface Access	Our village suffers with lorries ripping down low hanging electrical cables, getting stuck on narrow bends on the single track lanes and speeding due to having National Speed Limits once out of the village. For those that do cut through from the south to get north during times of the M1 closure, also bring the village to a standstill due to vehicles then needing to turn right from the junction of Chequers Hill and the A5183	Please see response ID1 above.

I.D	Response Topic	Written Representation (verbatim)	Luton Rising's Response
		(detrunked A5) Should Luton Airport expand to the proposed level, we would almost certainly become a constant cut through to get to the Airport during busy periods and when the M1 is closed for RTCs.	
3	Flightpaths	During 25th June and 14th October 2019 – monitoring by LLOAL recorded on average 225 flights per day during westerly departures or 17,764 aircraft departures during this time. These fly past under half a mile from the Village centre and less than that over Trowley Bottom. Within the Community Noise Report, Luton Airport - It states that they can't record all the flight noise, this may be due Luton Airport not servicing the noise monitor frequently enough, as the noise monitor in Flamstead had an internal power outage for 113 hours during this period.	Noted.
4	Flightpath Noise and vibration	Increasing flights in the morning and late evening, gives no rest bite from the constant aircraft noise for residents. These aircraft fly at an altitude of between 2500ft to 4500ft and larger aircraft creating noise of up to 75db. With the expansion, Luton would surely be looking to attract larger aircraft. Even though they have missed deadline to ensure all aircraft that take off from the airport are quieter A321neo- this hasn't made it less noisy.	The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003] . Quieter new-generation aircraft such as the Airbus 320Neo and 321Neo and the Boeing 737Max already form a substantial and increasing proportion of the fleet. Narrow-bodied aircraft are expected to

I.D	Response Topic	Written Representation (verbatim)	Luton Rising's Response
			continue to make up the vast majority of aircraft using the airport, even with the Proposed Development, with no more than 5% of movements over the longer term being by larger wide-bodied types as set out in Table 6.14 of the Need Case [AS-125] .
5	Noise and vibration	According to LLOAL's own monitoring, the A321 Neo recorded 64.4dB. Whereas the other older aircraft record on average 75dB.	See response to ID4 above.
6	Noise and vibration	Within the outlined proposal, this does not provide sufficient noise controls for Luton Airport to be held accountable. In its current form we will be lucky if Luton could be brought up to minimum levels that other UK airports operate at. Surely Luton Airport should prove it can operate to a minimum level before jumping by 14 million passengers and an additional 70,000 flights. Residents impacted by the airport deserve this.	The principal noise control secured in the DCO is the Green Controlled Growth Framework [APP-217] and the Noise Envelope that sits within it. The Noise Envelope contains a legally binding framework of daytime and night-time noise contour area Limits which will sufficiently control noise and provide certainty of the noise outcomes that will result even in the reasonable worst-case scenario.
7	Noise and vibration	Increasing the flights by 70,000 per year and Flamstead being affected by 74% of these, it seems ludicrous that Flamstead is not eligible for noise insulation and the Parish Council regards it as unacceptable to increase the noise impact and not giving any help to residents.	The Applicant's proposed noise insulation scheme goes over and above Government noise policy expectations, and extends the insulation scheme substantially further than the current policy operated by the airport.

I.D	Response Topic	Written Representation (verbatim)	Luton Rising's Response
			Eligibility for the noise insulation scheme is determined by noise exposure contours, so areas that are outside the areas of eligibility are not eligible for insulation as they are exposed to lower noise levels. See Draft Compensation Policies Measures and Community First [REP2-007] for more information on the noise insulation eligibility criteria.
8	Greenhouse gases	Flamstead is a selected small village in the green belt which is normally tranquil except for the aircraft that depart over the village. As part of the Metropolitan Green Belt building and infrastructure changes are extremely prohibited. However, Luton Airport want to completely bombard the skys above with aircraft. Polluting the air with green house gases which are not checked regularly. Continuing to fly older aircraft with no thought to those that wish to live in the countyside and not in a main town.	
			An assessment of changes to greenhouse gases due to the Proposed Development is provided in the Environmental Statement Chapter 12 Greenhouse Gases [APP-038]. This is inclusive of mitigation measures proposed to minimise greenhouse gas emissions. The Green Belt is not an environment receptor for the purposes of EIA but is a planning consideration and an assessment has been provided as Appendix B to the Planning Statement [APP-196] .

I.D	Response Topic	Written Representation (verbatim)	Luton Rising's Response
9	Various	Luton Rising or Luton Borough Council are one of the same. Luton reaps all the benefit of the airport and small villages have the noise, pollution and traffic congestion. The airport owners and management haven't adhered to the current permission conditions.	The roles and responsibilities of Luton Borough Council (LBC) are identified in the Roles and Responsibilities of Luton Borough Council document [REP1-018] . With regards the environmental effects resulting from the Project, reference should be made to the Environmental Statement (ES), submitted in support of the Application, and which has been prepared in accordance with the Environmental Impact Assessment (EIA) Regulations. This includes consideration of all effects, both adverse and beneficial.
			The Applicant is not aware of any planning conditions that have not been adhered to.
10	Air quality	Flamstead Parish Council strongly object to further expansion at Luton Airport. The proposal will clearly impact the lives of Flamstead residents, the countryside and the air we breathe.	A full Environmental Impact Assessment (EIA) has been undertaken in accordance with the EIA Regulations and the methodologies agreed through EIA Scoping and stakeholder engagement, and the findings reported in the Environmental Statement submitted with the application. This includes all effects assessed, both adverse and beneficial, including effects of noise [REP1-003], on biodiversity [AS-027], agriculture [APP-033], and landscape and visual [AS-079] receptors within agreed study areas.

I.D	Response Topic	Written Representation (verbatim)	Luton Rising's Response
			A robust air quality assessment has been undertaken in line with methodology and appropriate national legislation, in agreement with local planning authorities and technical working groups. This has been presented in Chapter 7 of the ES [AS-076]. No significant impacts are predicted to occur. Ecological habitats and human health were assessed, details of the modelled locations and results are provided in ES Appendix 7.3 [APP-063] , which found no significant impacts are predicted to occur.