

White Hill Centre
White Hill
Chesham
Buckinghamshire
HP5 1AG

6th September 2024

Department of Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

Dear Sir/Madam

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Application by London Luton Airport Limited (“the Applicant”) Seeking Development Consent for the Proposed London Luton Airport Expansion (“the Proposed Development”).

CONSULTATION SEEKING COMMENTS FROM THE APPLICANT and ALL INTERESTED PARTIES

I write in response to the above consultation.

The Chiltern Society is a charitable organisation set up to campaign for, conserve and promote the Chilterns Area of Outstanding Natural Beauty (AONB). The Chilterns was designated an AONB to protect its special qualities which include the steep chalk escarpment with flower-rich downland, woodlands, commons, tranquil valleys, ancient routes, villages with brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures. The Chilterns National Landscape is a tranquil place where landscape takes centre stage and stars brighten night skies. Tranquillity is an integral part of its uniqueness, and is recognised as a special quality. The Society seeks to ensure the AONB remains a place where people are inspired by its distinctive natural beauty, space and tranquillity, and to enjoy and care for the landscape. It is also acknowledged that the need for tranquil outdoor space is greater than ever given the urgency to address wide ranging issues including the increased health and mental awareness of people.

It is also recognised by other groups and bodies dealing with the AONB that the tranquillity of the Chilterns is shaped by the subtle interaction of many things – the folds in the landscape, ancient lanes and sunken hollows creating visual and sound breaks, the surprising lack of impact from nearby roads and rail, and the woodland and hedgerows that provide visual breaks and plentiful shelter. This tranquillity extends from day into night, from the vistas of the landscape at our feet, to the night skies above.

It is also recognised that the decision-maker (the Secretary of State) has a duty to further the “natural beauty” of AONBs, which, as noted above, includes tranquillity.

This proposal will lead to more aircraft using the same flightpaths. Some of those flightpaths (inevitably) go over the AONB, so the noise impact on the AONB will increase. This is contrary to the ethos and purpose of AONBs. It is noted that there are mitigating measures within these proposals to minimise impacts, such as quieter aircraft. However, the most effective way to address issues of noise

and disturbance on the Chilterns AONB, thereby protecting and improving the tranquillity of the area, can only be achieved through airspace change. This could amend routes to possibly reduce overflight of the AONB or, more realistically, at least allow for steeper climb profiles that would reduce the noise levels on the ground (because aircraft would be higher). This is not part of this consultation, but is subject of a separate process. It would also help overcome these concerns if permission was conditional upon this airspace change process having been completed.


It should also be noted that the “relative tranquillity – and subsequent dark skies – of the Chilterns National Landscape is one of its acknowledged special qualities”, referenced in the Chilterns AONB Management Plan. The document also recognises the potential conflict with Luton Airport noting “other pressures continue, like airport expansion at Heathrow and Luton which could result in more aircraft over-flying the AONB and harming its tranquillity”.

As such, and taking into account the above, the proposal, notwithstanding the mitigation measures, will still increase noise impacts on the Chilterns AONB, and that this is inconsistent with the duty of the Secretary of State, and will harm the quality and character of the Chilterns AONB.

We therefore raise objections to this proposal based on the detrimental impact on the special qualities of the Chilterns AONB.

Yours faithfully



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Planning Consultant for the Chiltern Society

