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Standing up for Hertfordshire's countryside

David Gurtler
Planning & Development Control
Luton Council
Town Hall
George Street
Luton LU1 2BQ

Our Ref:

Your Ref:

10th February 2021 (by email)

developmentcontrol@luton.gov.uk

Dear Mr Gurtler,

Application: 21/00031/VARCON

Luton Airport, Luton

Variation of Conditions 8, 10, 22, 24, and 28 to Planning Permission 15/00950 to accommodate 19 million passengers per annum and to amend day and night noise contours

I write with reference to the above application. CPRE Hertfordshire has previously objected to the variation of Planning Condition 10 (May 2019) and repeats its strong objection to this further attempt to increase the airport capacity and reduce controls on aircraft noise which will affect increased areas of Hertfordshire and elsewhere for the following reasons.

1. According to the Environmental Impact Statement(EIA) accompanying the application, the amendments to both capacity and noise contours are being sought ..“so (that) LLA is in a good position for the future and can continue to create benefits for the passengers, the supply chain and the local economy.” It further states that continuing to operate at the 18 million passengers per annum (mppa) “would not have delivered the anticipated economic growth... because restrictions would have to be placed on airlines to be confident that compliance with conditions attached to the 2014 Planning Permission was achievable”.
2. As noted previously, the reasons for those planning conditions were to safeguard residential amenity and to accord with the objectives of Policy LP1 and LLA1 of the Luton Local Plan and the National Planning Policy Framework. Nothing has changed since grant of the 2012 application to reduce the need to safeguard residential amenity and the airport has operated in violation of Condition 10(noise contours) since 2017 and could continue to do so.
3. The Planning Statement accompanying the application is silent on the extent of any economic growth to justify an increase in capacity and provides no evidence of what that increment might be. In any case, present circumstances relating to the pandemic and impacts on air travel would contribute to making any such assessment almost impossible to predict.

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Richard Bullen

Registered Charity 1162419



4. The Luton Local Plan refers to the need to “achieve further noise reduction or no material increase in day or night time noise or otherwise cause excessive noise at any time of day or night..(and should)..include proposals that will, over time, result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents, occupiers and users of sensitive premises in the area, through measures to be taken to secure fleet modernisation or otherwise”.
5. However, the EIA states that “the proposal would result in 2022 an increase of 724 new properties being exposed to an increased level of noise due to the forecasted increase in air traffic”. Even this increase is based on assumptions about the rate of replacement of noisier aircraft types and the EIA notes that this is beyond the control of the airport operators and with the current pressures on airlines’ budgets is likely to take longer thereby further increasing the number of properties affected.
6. In terms of atmospheric emissions, the EIA indicates higher total CO2 emisisions for every year from 2019 and these are based on estimates of older aircraft types which may be challenged, notwithstanding the lack of evidence regarding future economic development.
7. The application is at best premature, given the major uncertainties surrounding key assumptions in the Planning Statement and EIA. The variation of conditions proposed would have adverse effects on local communities by virtue of noise generation and increased CO2 emissions, in the absence of evidence of economic benefits and optimistic estimates of aircraft replacement.
8. Communities around the airport have suffered the adverse effects of over-optimistic estimates made by the airport owner and operations in contravention of planning conditions for many years. This is unacceptable and no further amendments to planning conditions should be made until more evidence of critical factors is available.

Yours sincerely,

Chris Berry
Planning Manager