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**Standing up for Hertfordshire's countryside**

## **FUTURE LUTON CONSULTATION - April 2022**

**Proposed expansion of London Luton Airport's maximum passenger capacity to 32 million, building a second terminal, and making best use of the single runway.**

Our response relates to the questions set out in the Luton Rising on-line consultation form with headings and questions shown in brackets.

### **1. Introduction (About us Q1 – 4)**

- 1.1 This submission is prepared by CPRE Hertfordshire – the countryside charity. CPRE Hertfordshire is a local countryside charity, part of the national CPRE network. We work to promote, enhance and protect a beautiful, thriving countryside for everyone to value and enjoy.
- 1.2 Founded in 1928 we are a grassroots organisation, with about 1000 members and a small team of staff supported by volunteers. CPRE Hertfordshire has a long history of campaigning against inappropriate development on Hertfordshire's green spaces. We also work with local groups around the county, providing advice on how they can best protect the countryside near them.

### **2. CPRE Hertfordshire position (Our expansion plans Q5)**

- 2.1 CPRE Hertfordshire strongly oppose the proposal to expand Luton Airport from 18 million to 32 million passengers per annum and believe that no application for a Development Consent Order should be submitted to the Planning Inspectorate for determination. Our objections are based on matters of both principle and detailed points of concern as noted in the remainder of this submission
- 2.2 There is no substantive difference between the present and previous applications despite the Applicant's assertions that significant changes have been made. In essence, the magnitude of the expansion proposals and their impacts are similar and have in fact become more damaging with the changing circumstances which will be explained in this submission.
- 2.3 The minor alterations since the previous consultation may be summarised as;
  - reduction in the size of the airfield platform and earthworks required,
  - reduction in the footprint of the proposed car parking areas;
  - inclusion of solar and geothermal energy provision for Terminal 2 (net zero),

- inclusion of a new Airport Access Road and improvements to the Airport Way/Percival Way junction;
- changes to the replacement open space for Wigmore Valley Park to keep more trees and maintain biodiversity;
- an approach to managing the potential effects of future expansion called 'Green Controlled Growth',
- updated compensation proposals.

### **3. Objections to the Draft Need Case (Why grow?Q6)**

- 3.1 The consultation poses the question 'Why grow?' and seeks to justify itself as an 'important connectivity asset' in the region, driving a traditional economic growth strategy. CPRE believes that this approach is basically flawed for two principal reasons; incompatibility with the climate emergency, and the need to rebalance economic development as envisaged by the Government's 'levelling-up' commitments.

#### **Climate emergency**

- 3.2 The application flagrantly ignores the reality of the climate emergency and the impacts of rapidly expanding aviation, the fastest growing source of green-house gas (GHG) emissions. It is increasingly recognised that there is a climate emergency and the proposed expansion of 103,000 additional flights a year, a 60% increase on current levels producing hugely increased emissions, is incompatible with it.
- 3.3 The work of the Intergovernmental Panel on Climate Change (IPCC) in 2018 underlined how, despite current efforts, we are on course for more than two degrees Centigrade warming above pre-industrial levels and the catastrophic consequences this would entail. The IPCC highlighted an urgent need to halve GHG emissions within the next ten years and the UK Parliament and many local councils, including those of Hertfordshire and Bedfordshire have declared climate emergencies. The UK Government has adopted a zero carbon target for emissions by 2050 with many proposals by political and environmental organisations, including CPRE, for this to be accelerated.
- 3.3 The proposed growth of air traffic at Luton Airport by 103,000 flights, to 240,000 per annum, represents a 60% increase and it is the growth of flights which represents by far the most significant increases in GHG. This is neither 'sustainable growth' nor 'sustainable development'.
- 3.4 The proposed expansion, producing an estimated 1.3m tonnes of carbon emissions a year, is fundamentally flawed and completely at odds with the urgent action required to respond to the climate emergency, as well as the public mood for action. Aviation CO2 emissions are significant and a single flight from London to New York emits the equivalent CO2 for an average person's home heating in a whole year.

- 3.5 The UK's Committee on Climate Change (CCC) in May 2019 noted that action to achieve the statutory target of net-zero emissions (removing as many greenhouse gas emissions as we produce) by 2050 is currently falling far behind what is required. The CCC recommended a 2050 date to achieve carbon neutrality, subsequently approved by the UK Parliament.
- 3.6 It outlined a scenario that allowed for limited growth in air traffic to 2050 of 25% (well below that being proposed for Luton Airport) and recommended constraints on airport capacity. Luton Airport expansion plans are therefore at odds with the latest recommendations of the CCC.
- 3.7 Luton's plans are based on highly challengeable forecasts of growth from 2017 produced by the Department of Transport which suggest that national aviation forecasts will increase very significantly, and that the Covid-19 pandemic will merely delay this increase in demand by five years. Notwithstanding the questionable nature of the assumptions regarding demand, there is clearly the need for restraint in the light of the climate emergency which is not considered in the consultation document.
- 3.8 How restraint may be applied is considered in the absence of up to date national aviation policy. The Airport National Policy Statement June 2018 supports the best use of existing runways, acknowledging a minority reject the need for expansion, but this was based on the Airport Commission's Report July 2015 which said a new runway and air traffic growth could still take place within the national obligations of the climate emergency.
- 3.9 The target is now of course 100%, not 80%, and national policy presently fails to connect the interrelated aspects of aviation strategy, climate action and carbon targets. There is an urgent need to amend Government aviation policy according to existing carbon targets as circumstances have changed significantly since 2018.
- 3.10 Furthermore, the National Planning Policy Framework (NPPF) refers to the Department of Transport General Aviation Strategy 2015, a document which makes no mention of climate change or carbon reduction targets. Implicitly addressing the inadequacies, the Government publications 'Beyond the Horizon' in 2016 and consultation on 'Aviation 2050' in 2018 acknowledged the need to negotiate long term international goals on emissions with the International Civil Aviation Organisation (ICAO).
- 3.11 With regard to the demand for aviation, CPRE would point to 'flight free' campaigns and evidence that people and organisations are questioning their need to fly more than ever. Sustainable strategies for air travel should align with land use planning strategies in reducing the need to travel and the costs and benefits of flying should be reassessed in the context of the climate emergency.
- 3.12 As people 'vote with their feet', the 2017 Department of Transport forecasts of air traffic growth used to justify Luton Airport expansion may be seen as unsound, as well as contrary to the government's own climate obligations. For example, in Sweden

there was a 5% reduction in flying for the first quarter of 2019, before the pandemic, and awareness of flying's environmental impacts is growing and being better understood. A survey of 6000 people by Swiss UBS (October 2019) revealed that one in five people had cut the number of flights they took over the last year because of the impact on the climate; it expected the growth in air passenger numbers could be halved if such trends were borne out.

### Levelling-Up

- 3.12 The case for the expansion of Luton Airport may also be significantly impacted by the Government's 'levelling-up agenda' which seeks to rebalance economic development and growth to where it is most needed. The recently Levelling-Up White Paper re-introduces many elements of regional policy which have not been promoted for many years.
- 3.13 Future growth should not be seen as inevitable, and the demand forecasts underpinning this proposal will be affected by national and international policy approaches to economic growth which can influence demand as well as local changes to commercial activity. This is particularly relevant when specific developments have major environmental impacts which reduce living and working conditions for huge number of people, as will be demonstrated later in this submission.

## 4. Comments on the proposed benefits of expansion (Benefits of Expansion Q7)

- 4.1 The forecast of 12,100 new jobs as a result of airport expansion is considered highly unreliable. There is no linear relationship between growth and local jobs and employment claims are routinely over-stated by development promoters.
- 4.2 Over the period 2010 to 2018, passengers through Luton Airport increased by 90% (8.7 million passengers per year to 16.6 million) but directly-employed jobs, a proportion of which are part-time, increased by only 26% (8,200 to 10,400). This was significantly below the previous forecast benefits, and when the second runway at Manchester was proposed, the promised 55,000 jobs were subsequently reassessed to be less than 6,000.
- 4.3 A previous statement by Oxford Economics Forecasting (PEIR, Vol 3, Appendix 13-1, para 1.2) in the earlier consultation, stated that 'we estimate and forecast the economic contribution of London Luton Airport but we do not make any assessment of the extent to which the contribution identified will be additional to what would have occurred in the absence of its future development'. This suggests that much of the forecast economic growth may happen regardless and independent of the proposals.
- 4.4 Also, the airport expansion will add to the tourist spending deficit calculated by the Office of National Statistics at £22bn per year. This takes spending and economic activity out of the country, and in the absence of expansion more of the tourist spend

would remain within the domestic economy. No account of this effect is made within the submission and a more sustainable alternative strategy would limit overall numbers travelling, retaining local spend, creating more work and employment without accelerating climate change.

**5. Design comments (Proposed design (8.))**

No comments

**6. Local transport concerns (Getting to the airport Q9)**

- 6.1 Surface access to and from the airport is a key issue in the consideration of the proposals. Luton Airport's public transport links are already inadequate, and the airport has the lowest levels of public transport use (25% of journeys) of any airport in the London region.
- 6.2 There is a shuttle bus which will be replaced by the DART service connection from Luton Airport Parkway on the London Midland Line, but there will still be no direct rail service to the airport from London as this necessitates a change at Luton Parkway. The area lacks good public transport east to west as bus services are poor and east-west railway routes were lost back in the 1960's.
- 6.3 90% of airport passengers are leisure holiday travellers with luggage, and about 68% of them arrive by car. The proportion has remained fairly static for years despite various 'Surface Access Strategies'.
- 6.4 The predicted increased in the use of public transport (from 23% to 45%) and subsequent reduction in the proportion of car based arrivals and departures is of course welcomed. However, the existing Midlands Mainline already has capacity and congestion issues and the success of Luton DART, already under construction, will depend on its usability, frequency and its fares.
- 6.5 Significant further improvements will need to be made to the availability of railway and other convenient public transport access to the airport. A further 14 million passengers could result in up to 40,000 extra journeys, the majority of which are still likely to be made on local roads on the basis of the revised proposals. Significant congestion will thus be a result of the level of airport growth being proposed, especially at peak times.
- 6.6 There needs to be far greater investment in a wider network of sustainable transport modes if the proposed targets of reducing car borne trips is to be achieved or improved. CPRE advocates, regardless of any expansion plans, a much more ambitious target of road traffic reduction with an eventual goal of full sustainable transport use by airport employees and passengers.
- 6.7 The plans propose an additional 7,750 car parking spaces which will generate more private car use, congestion and more GHG emissions. The road network will inevitably

be inadequate and congested, and this will lead to further pressures for road building around the site and into nearby countryside.

- 6.8 The A1081, A5183 and the B653 into Luton from within the St Albans City & District and wider area already suffer significant congestion, as does the M1. Whilst some improvements to the A1081 have been identified in the consultation documentation, it is considered that on-going monitoring and assessment of all of these routes should be carried out so that the impact on local communities may be identified.

## **7. Construction and phasing objections (Airport construction Q10-11)**

No comments

## **8. Environmental objections (Environment Q12-13)**

- 8.1 There is a wide range of environmental objections to the proposed expansion, and the over-arching concerns of the climate emergency have been noted above. In addition there are significant issues with regard to noise pollution, the impact on the countryside, air quality, and the concept of Green Controlled Growth which is introduced in this consultation. Issues regarding the impact on open space and Wigmore Valley Park are addressed separately below.

### **Noise pollution**

- 8.2 It is inevitable that noise pollution will increase with the proposed expansion and the impacts are underestimated in this consultation. Luton Airport is a site located within a tightly packed series of large towns and cities that are already adversely impacted by noise including Hemel Hempstead, Harpenden, St Albans, Stevenage and Luton itself. Areas of countryside in Hertfordshire and Bedfordshire experience a loss of tranquillity on account of the airflight paths with anticipated severe localised impacts on areas such as at Kensworth to the west and Breachwood to the east.
- 8.3 The 103,000 additional flights every year, a 60% increase to 240,000 flights per annum, will inevitably bring greater noise impacts and damage wider areas of countryside, within Hertfordshire especially. Based on Luton Airport's Preliminary Environmental Information Report, in the summer quarter, average noise levels around the airport will increase by between 1.2dBA Leq and 3dBA Leq.
- 8.4 The experience of aircraft noise is also subjective and intermittent, so that the Leq industry standard used to predict averages can be misleading. The 16 and 18-hour average noise levels, which still show a significant increase, do not reflect the existing and forecast increases in intrusion and the human experience of aircraft noise as sudden loud events within longer periods of relative silence.
- 8.5 Noise impacts cannot therefore be properly understood by quoting a Leq average. Calculating the average noise from a number of relatively short but very loud events amidst longer periods of relative silence does not produce a meaningful criteria

for noise nuisance in these cases and the expansion proposals are inconsistent with the National Planning Policy Framework 2021 provisions on noise by new development (Para 185a) as stated:

*“mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”, (para 185a)*

- 8.6 The proposals are also not compatible with the provisions of Luton Local Plan Policy LLP6, which even though it was redrawn to be more favourable to airport growth, states that expansion proposals should:

*“include proposals which will over time result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents and occupiers and users of sensitive premises in the area, through measures to be taken to secure fleet modernisation or otherwise....”*

- 8.7 The proposal’s modelling shows that 1,100 people will be exposed to ‘significant’ noise effects during the daytime and 800 people during the night-time period and, if the 2043 noise level contours with the expansion are compared against the 2043 noise contours without the expansion coming forward, then the difference in noise would be between 1 and 3 dB higher with the proposed expansion.
- 8.8 There is also likely to be a substantial increase in the number of households experiencing ‘adverse’ noise effects as a result of the expansion (as opposed to significant adverse effects). As already noted the predictions for noise reduction rely on over optimistic assumptions about ‘next generation’ quieter aircraft models, an argument previously used to justify growth at Luton of up to 18mppa.
- 8.9 It is accepted that, since 2017, the approved noise contours have been exceeded by Luton Airport and the Council has failed to enforce planning conditions attached to planning consents. It is not appropriate to assume that the fleets of aircraft using Luton Airport will be universally converted to marginally less-noisy types by any given date. Much of the current fleets using the airport are comparatively new and unlikely to be replaced in the near future.

## **Air quality**

- 8.10 As part of this consultation exercise, the airport states that the future use of newer generation aircraft, together with more efficient and electric road vehicles will reduce emissions in the future. The applicants air quality assessment, like the noise assessment, therefore places significant reliance on these assumptions. However, as with the noise forecasting mentioned above, the airport authority is not in a position to guarantee that the uptake of the newer generation aircraft and/or the use of more electric vehicles generally will be achieved as forecasted.
- 8.11 The air quality and pollution forecasting for the proposal therefore suffers from the same potential inaccuracies as the noise forecasts and modelling. Traffic to the airport also passes through a number of Air Quality Management Areas including Luton,

Hitchin, Dunstable and St Albans and expansion will result in further harm to localised problems of air quality.

- 8.12 It is not possible to conclude that the proposals can be achieved without significant noise and pollution impacts, or that these impacts can be suitably controlled, as is required by national aviation and local planning policy.

### **Loss of countryside**

- 8.13 There will be significant harm to surrounding countryside in terms of the changing character brought about by the expansion plans as well as the loss of open landscape and light pollution. The major expansion of the footprint of development with new buildings, the extended apron for aircraft movement, the new terminal buildings and 7,750 additional parking spaces car parking areas will encroach on existing greenfield areas to the east of the airport.
- 8.14 A key requirement of national planning policy regarding designated protected areas is the expectation of tranquil enjoyment of Areas of Outstanding Natural Beauty (AONB), including highly valued beauty spots like Dunstable Downs and Ivinghoe Beacon, the Ashridge Estate and areas to the southwest and east of Luton. The area is already significantly affected by aircraft movements and the impacts in terms of noise and visual amenity will increase with these proposals.

### **Green Controlled Growth**

- 8.15 Great play is made in the consultation documentation of the introduction of the concept of 'Green Controlled Growth' as a set of guiding principles affecting the proposed expansion. The Applicant promotes this approach as "one of the most far-reaching commitments to minimising environmental impact ever put forward by a UK airport".
- 8.16 The draft Green Controlled Growth Proposals document accompanying the application lists four areas where impacts will be managed specifically as passenger numbers grow. They comprise; aircraft noise, air quality, greenhouse gas emissions and surface access.
- 8.17 It is suggested that limits should be imposed for each of these categories and a 'framework' will be set up to ensure that the limits are not breached and that growth only takes place within strict environmental limits. An Environmental Scrutiny Group is proposed to oversee Green Controlled Growth to include representatives from local councils, including Luton and technical experts.
- 8.18 CPRE Hertfordshire has reviewed the 53 page Green Controlled Growth Proposals document and we note that the content of the proposals will be provided by the Environmental Statement which is required as a result of Environmental Impact Assessment (EIA) regulations. This is a requirement for all major development



proposals and effectively covers the same concerns as those promoted as Green Controlled Growth (GCG).

- 8.19 The Applicant asserts that GCG goes beyond the usual requirements of the EIA process, “providing a level of ongoing assurance and control over the environmental effects of expansion.” They also assert that the GCG proposals will be enforceable and remain ‘active’ beyond the grant of development consent.
- 8.20 We believe that these assertions are misleading in that environmental conditions attached to any consent are always enforceable under existing legislation, and the heavy promotion of this concept is suggesting additional controls which are both unnecessary and unlikely to be implemented robustly. There is constant reference in the consultation documents to the binding nature of the GCG commitments but again this is unlikely to introduce anything beyond what should be normal enforcement of environmental conditions and standards.
- 8.21 A total of only 15 pages (Section 4) out of 53 in the GCG Proposals document is devoted to discussion of the technical content of GCG limits and thresholds. These technical matters will be dealt with most appropriately in the Environmental Statement and supporting information and there is no need for a further, potentially wasteful, layer of institutional arrangements to undertake monitoring functions which are already statutorily required.
- 8.22 Further, the recent enactment of the Environment Act and subsequent related legislation in the future is likely to strengthen the responsibilities of institutions of all kinds with regard to the environmental impacts of their activities. We welcome the stated intentions of the GCG concept but these should already be part of the EIA process, and we do not believe that the introduction of a further layer of process as suggested is likely to provide any additional benefits to either the Airport or those affected by its activities.
- 8.23 In summary, the global warming effects of non - CO<sub>2</sub> emissions, gases aerosol particles etc being injected into the upper atmosphere, are not fully understood and national and international policy is under review. In its absence a precautionary approach should be taken to environmental harm.

## **9. Loss of open space (Open space Q14)**

- 9.1 Luton Borough Council has appropriated the Wigmore Valley Park, a long-established park and nature reserve for the proposed expansion which will result in the loss of the Wigmore Valley County Wildlife Site, and a second wildlife site will be seriously impacted. Major earthworks will take place across these areas east of the Luton boundary with an unnatural earth bund up to a height of 20 to 30 metres above existing ground levels.
- 9.2 Wigmore Park as an open space was gifted to local residents in compensation for the loss of green space to residential building. It has evolved into an integrated and

mature habitat, with a developing and varied ecology including thousands of orchids, bees, butterflies and over 60 bird species.

- 9.3 Wigmore Park has achieved County Wildlife Site status, received public recognition and awards and is listed as an Asset of Community Value. It enjoys wide support as a popular and much-loved recreational space for the local community and acts as a noise, pollution and visual buffer between the eastern end of the Airport runway and the residential area less than a mile to the north.
- 9.4 CPRE supports local residents in objecting to the intention of Luton Council to dispose of the Park to Luton Rising for airport infrastructure. It deserves special treatment as an Asset of Community Value and as a buffer to Airport operations.
- 9.5 The Park is an important element of the commitments made in the Luton Local Plan to mitigate and reduce over time the noise and amenity impacts of the Airport. Notwithstanding concerns relating to the nature of the relationship between Luton Council and Luton Rising which have been raised by others, the proposals to 'replace' the area intended for use by the Airport with additional land are both inadequate and inappropriate.
- 9.6 The offer by the Applicant of replacement land does not make up for the loss of a mature, ecologically rich and highly valued landscape. It cannot, self-evidently, act as the buffer to the airport as originally intended and the expansion plans constitute a major encroachment into open countryside.

**10. Comments on compensation** (Compensation and Community First Funding Q15-16)

No comments

**11. Further comments** (Q17)

No further comments.

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