

# CHOLESBURY-CUM-ST LEONARDS PARISH COUNCIL

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## **Public Consultation on the Master Plan for Luton Airport.**

Dear Sirs,

This council represents parishioners of Cholesbury-cum-St. Leonards. At its closest point to Luton Airport the parish is some 16 miles to the south and west as the aircraft flies, at around 250 metres above sea-level, in the Green Belt and in the Chilterns Area of Outstanding Natural Beauty (AoNB). It is under flight paths for both Luton and Heathrow airports.

The opportunity to comment is welcome. However, its value is diminished by the short timeframe of six weeks, rather than the twelve recommended nationally for such significant proposals.

Your questionnaire is puzzling.

Some questions clearly help you categorise the respondents (*"Do you live in Luton or close to the Airport?" "Do you use the train services from Luton Airport Parkway Station?"*). But some have nothing to do with the plan (*"Do you work at London Luton Airport ...?"*). Many of these concern current operation (*"Does the presence of the Airport cause disturbance to you and your family?" "How do you think walking around the Airport could be improved?"*) And at least one is pointless (*"Do you agree we should try to improve this road congestion?"*)

Of up to 18 questions posed, only three refer to the plan: number 5 (*"How do you feel about our overall proposals?"*), number 16 (*"Are there any other environmental issues you consider we should address?"*) and number 20 (*"What other issues do you think we need to take into account in our Masterplan and planning application?"*). We answer only those three, with supplementary comments. We comment only on air traffic implications, not on developments within the airport's boundaries. Our answers are attached.

Yours faithfully,

S H Bell  
Clerk to the Council  
23 April, 2012.

## Cholesbury-cum-St. Leonards Parish Council's response to your Master Plan.

### **How do you feel about our overall proposals?**

We are opposed to them.

Overall, we are suspicious of the very idea of increasing the passenger throughput of the terminal, especially given Luton Borough's view that passenger throughput should not be the measure of capacity, since it cannot be controlled (Development Brief, 2001).

### ***Environment***

Our principle interest in your proposals is the impact of increased flights on the tranquillity and enjoyment of our parish and the Chilterns AoNB in general, by residents and visitors, by day and by night. Nowhere in the plan do you even touch on this. You concentrate on development within the airport boundaries and the ground transport infrastructure supporting it. In common with LLAL's recent consultation document, the words "Outstanding Natural Beauty" appear nowhere in the body of your Master Plan, not even individually, let alone as a phrase.

A number of times in your plan you claim to respect your neighbours. We may not be close neighbours on the ground, but we are as the aircraft flies and yet you ignore the likes of us by making no mention of protecting the Green Belt in general and the AoNB in particular. Your plan considers only your close neighbours and disregards other communities who would also be severely affected by increased noise and air pollution.

We note that the new item 38 of your January, 2012, Noise Action Plan specifically refers to "traffic" impact on AoNBs, but it is not clear whether you include air traffic or mean only ground traffic. That item is not due to be implemented until 2013, which probably means 31 December, 2013. We would not want your plan to delay that, but rather have it done sooner; your plan does not even refer to it.

By deferring this topic to the Environmental Statement accompanying your eventual planning application, you limit the likes of us to making only general comments and deprive us from helping shape your environmental protection measures early on.

The absence of even a synopsis of a likely Environmental Impact Assessment (EIA) is a severe deficiency.

### ***Noise.***

Our visitors and residents perceive aircraft noise in terms of frequency of overflights and how intense is the noise each time. Your industry's usual calculations blend these into a misleading figure, with no distinction between peak noise levels, which may well be reducing, and average noise levels, which may well increase.

In paragraph 9.10 you say the number of flights would increase by 33%. In paragraph 9.27 you say "*Whilst there will be increases in the number of flights, the proposed magnitude of this increase will be within acceptable limits.*" You may find this acceptable, but you don't say who else does.

At bullet point 4 in paragraph 5.8 you claim that "*The increase in passengers will be higher than the increase in aircraft movements, making more efficient use of aircraft movements.*" Possibly. In paragraph 9.10 you amplify that, claiming the 33% growth in aircraft movements would result in 58% growth in passenger movements and that "*The percentage increase of passenger movements*

*will be greater than the percentage increase of aircraft movements over the period due to a small and gradual increase in average aircraft size."* But according to your Annual Monitoring Reports, average occupancy is now less than 80%. You give no reason for that to change. To what extent would offering 33% more flights spread the passenger loading and so actually lessen occupancy? So would bigger aircraft just carry proportionately even fewer passengers?

Nowhere do you explain your assumptions about changes in types of aircraft, flight frequency and flight occupancy and how those compare with today.

We are led to obvious conclusions. Increasing off-peak flights, the "*peak spreading*" of paragraph 9.9, would mean more frequent daytime aircraft noise. Bigger aircraft would mean more intense daytime aircraft noise.

You state "*the potential changes in the local noise environment have been an important factor in determining the proposed scale of development*" (9.26). From the context, "*local*" means within the immediate vicinity of the airport. Why only "*local*?" On page 22 of your Noise Action Policy you acknowledge that night noise is an issue beyond the area covered by the noise contour maps, which show only the area immediately surrounding the airport. Later on the same page you state, that "*The DEFRA Noise Action Plan guidance recognises the potential conflict between government airspace policy, which requires aircraft routes to avoid densely populated areas, and the need to preserve tranquillity in quiet areas in open country.*" On page 32 you claim to have taken this into account.

But your plan omits the noise impact of your proposals, not even on the areas covered by your usual, local noise contour maps, let alone on more distant communities and amenity areas already affected by Luton air traffic noise, in particular those high up in the Chilterns.

We would be pleased to note you "*commit to reducing the current proportion of night flights*" (9.28), had you not used the word "proportion." You plan to increase the number of flights by 33%, so a reduced proportion would probably still be a greater number. We want a smaller number.

So we oppose your plan. You talk of aircraft noise improving, but cite no evidence and commit to no action; it is a mere aspiration. We think your plan would increase noise levels if larger aircraft come into service. We think noise would occur more frequently as the number of flights increases, especially if you achieve your ambition of peak-spreading. We think night flights would be noisier and more frequent, especially since you draw up your own Night Noise Policy and already define a shorter night time than does the CAA.

### ***Jobs.***

This parish is not affected by changes in employment at Luton Airport, but we fear those communities who are may be misled. We believe historical figures from Annual Monitoring Reports show the increase would be far less than you claim. Moreover, you do not say whether you have taken into account increases in automation and employers' efforts to reduce staffing.

### ***Government White Paper.***

We are pleased you acknowledge the need to take into account the UK Aviation White Paper, but its publication has been delayed. You should delay submitting your planning application until then.

***In our planning application we will include an environmental impact assessment that will look at Air quality and climate, Economic and social effects, Hydrology and water quality, Noise and***

**vibration, Traffic and transportation, Cultural heritage, Ecology and nature, conservation, Ground conditions, Landscape and visual impact, Waste.**

**Are there any other environmental issues you consider we should address?**

Your list is comprehensive, but only because it is generic.

We should have had a synopsis of the likely contents of the Environmental Statement, especially of the EIA.

The EIA must cover a wider set of neighbours than those in your plan. It must include the steps you would take to ensure protection of all populated land areas under any flight path into or out of Luton airport in which an aircraft might be ascending, descending or stacked.

We want substantiated detail of current and predicted noise events and intensity.

We want to see how your Noise Action Plan would change if your proposals are implemented.

We want to see regular, frequent noise monitoring carried out in the broader AoNB and the results included in those already being published.

**What other issues do we need to take into account in our Masterplan and planning application?**

Given our location, we want to know how increased Luton air traffic would be incorporated with Heathrow air traffic and the Bovingdon Stack and whom you would consult about this.

Given your ambition to be a prime “London” airport, we want Luton Airport to be subject to the same Night Noise Policy as other “London” airports.