

CHOLESBURY-CUM-ST LEONARDS PARISH COUNCIL

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Public Consultation on the Revised Master Plan for Luton Airport

Dear Sirs,

At its closest point to Luton Airport the parish of Cholesbury-cum-St Leonards 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. It is under flight paths for both Luton and Heathrow airports.

For the third time this council welcomes the opportunity of responding to proposals for developing Luton Airport. Once again we object to the short timeframe of six weeks, rather than the twelve recommended nationally for such significant proposals.

However, the short time allowed is less of a problem this time; the council opposes the Revised Plan for the same reasons and in much the same terms as before.

We congratulate you on the concise questionnaire, just four questions compared with up to eighteen last time. Our answers are attached, with supplementary comments.

Yours faithfully,

S H Bell
Clerk to the Council
9th October 2012

Cholesbury-cum-St. Leonards Parish Council's Response to your Revised Master Plan

1. Are you broadly supportive of the revised proposals to increase the capacity of the airport to 18 million passengers and upgrade airport facilities?

No. We oppose them.

We see even less justification for attempting to increase passenger throughput to 18mppa than we saw for 16mppa. We believe your claims about increasing demand for air travel and the associated economic benefits are even more exaggerated than in the previous plans.

Indeed we are suspicious of the use of passenger throughput as a measure of capacity, especially given Luton Borough's view that it is not valid, since it cannot be controlled (Development Brief, 2001).

In short, we think your whole plan is based on an extremely doubtful premise.

2. We wish to improve the experience of passengers using the airport. Do the revised proposals cover all of the elements required to achieve this? If not, what other aspects of the airport's operation should LLAOL consider?

We have no comment to make.

3. The impact of the proposals on the surrounding area will be assessed through an Environmental Impact Assessment and mitigation measures identified. Are there particular aspects of the revised proposals that concern you?

Scope of the Environmental Impact Assessment (EIA)

You claim "LLAOL fully understands that the Airport also creates an impact on local residents, principally through the generation of noise and traffic. It will continue to strive to minimise this impact on its local communities." (2.7). Then, in paragraph 3.20, you state "We recognise that aircraft noise represents an important issue for our neighbours and we are committed to proactively working with local communities"

However, your definitions of "neighbour" and "local" are unfairly narrow as the passenger aircraft flies. You consider only your immediate neighbours. We are not affected by ground traffic 16 miles away, but air traffic is another matter, especially ascending or descending. Yet you ignore us and all other similar communities who would be severely affected by increased noise and air pollution; you make no mention of safeguarding the Green Belt in general and the AONB in particular.

Item 38 on page 27 of your 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; in fact we'd rather it was done sooner. Your plan does not even refer to it.

We recognise that from a planning point of view the EIA does not include anything beyond the impact of the proposed construction work on the immediate area, but the absence of even a synopsis of the likely environmental impact of your proposals on neighbours further afield conflicts with your claimed spirit of goodwill towards them. It is a severe deficiency. By deferring and limiting 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.

Increased Air Traffic Movements

At bullet point 4 in paragraph 5.7 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 40% growth in aircraft movements would result in 73% growth in commercial 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." You offer no supporting detail, so we take this as mere aspiration.

According to experts analysing your Annual Monitoring Reports, average occupancy is now less than 80%. You give no reason for that to change. To what extent would offering 40% more flights simply spread the passenger loading and so actually lessen occupancy? How likely is it that bigger aircraft would just carry proportionately even fewer passengers?

You do not express your ambition of 157,000 aircraft movements a year as movements each day. Simple arithmetic results in 430, an increase of 124. Other estimates are as much as 160 a day, with one every 90

seconds at peak times. You do not explain how these flights would be shared across arrival and departure routes. The latest Annual Monitoring Report shows that roughly 70% of runway use is westerly. No doubt many flights change course before reaching us, but, being to your west, we take your silence as ominous. Our neighbours to our east must be far more worried.

Noise

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. Our visitors and residents perceive aircraft noise in terms of frequency of overflights and how intense is the noise each time. You make no distinction between peak noise levels, which may well be reducing, and average noise levels, which may well increase.

We welcome many of your proposed noise mitigation measures (Figure 9.4) as steps in the right direction. Sadly, the Quota Count you propose for night noise does not model its real impact. People's reaction to a continuous low hum is very different from their reaction to a number of separate bursts of noise. Your Quota Count doesn't make the distinction: you calculate it by multiplying the noise of an aircraft by the number of its night movements, thus producing an aggregate of all noise, with no regard to the intensity and frequency of individual noise events. This is unrealistic and misleading.

To limit night noise from other "London airports" Government insists they use a longer period for night-time and sets a maximum number of movements in that period. For your night noise quota scheme to be truly "in line with that used at other UK airports" you must be subject to the same rules.

In Figure 9.4 you describe possible changes to aircraft engines, but 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 aircraft noise by day and by night, especially during the morning rush hour. Bigger aircraft would mean more intense aircraft noise, by day and by night.

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 of the same policy you claim to take this into account.

But even the areas covered by your usual, local noise contour maps are barely touched on by your Master Plan, and you completely ignore more distant communities and amenity areas already affected by Luton air traffic, in particular those high up in the Chilterns.

So we oppose your plan. We think your plan would increase noise levels if larger aircraft come into service. We think both daytime and night-time noise would occur more frequently, 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.

4. Any other comments?

Scope of the Master Plan

We understand your planning application must concentrate on development within the airport boundaries and the ground transport infrastructure supporting it, but, should planning approval be granted, the whole expansion plan becomes an accomplished fact. Your Master Plan should offer opportunities to comment on issues much broader than those taken into account in assessing the planning application, such as its impact beyond adjoining communities and how your increased flights will be incorporated with those of other airports. You provide no such information.

What steps do you propose 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? In our own case, for example, we want to know how increased Luton air traffic would fit with Heathrow air traffic and the Bovingdon Hold and whom you would consult about this.

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.

Draft Aviation Policy Framework

We are pleased you acknowledge the need to take into account the Aviation Policy Framework but it is still only in draft. Once it is published you should review your Master Plan, run a consultation and only then submit your planning application.

Sustainable Development

You point out (10.9) the environmental aspects of the government's concept of sustainable development, but you fail to mention anywhere any measures to protect the natural, built and historic environment beyond the airport's immediate surroundings.

And regardless of the outcome of the planning application...

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

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.

S H Bell
Clerk to Cholesbury-cum-St Leonards Parish Council
8th October 2012