

# CHOLESBURY-CUM-ST LEONARDS PARISH COUNCIL

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**Ref. Luton Airport: Luton Borough Council Planning Application number 12/01400/FUL**

**Proposed alterations to Airport Way/Airport Approach Road, infill extensions and alterations to terminal buildings, extensions to existing mid and long term car parks, new taxiway (Foxtrot), extensions to the existing taxiway (Alpha) and aircraft parking aprons (including 6 new stands) and a new multi-storey car park linked to terminal building.**

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 Metropolitan Green Belt and in the Chilterns Area of Outstanding Natural Beauty. It is under flight paths for both Luton and Heathrow airports. Our concern is the impact of increased operations at Luton on not only our parish but also on the Chilterns AONB as a whole.

Approval of this application underpins the airport's expansion plan. It can be justified only insofar as the whole plan is justified and acceptable, so the two must be examined as one. To do otherwise would not only endanger this AONB, but could set highly undesirable precedents for other AONBs and for other airports.

We believe the application should be called in by the Secretary of State. We note that planning applications may be called in if, among other things, they

*“may conflict with national policies on important matters”, “could have significant effects beyond their immediate locality” and “give rise to substantial regional or national controversy”.*

(Planning Inspectorate Good Practice Advice Note 03 and the policy statement at Annexe B of the Planning Inspectorate's current Procedural Guidance for Planning Appeals and Called-in Planning Applications.)

Here are our reasons in more detail:

**1. “May conflict with national policies on important matters”**

Contrary to the applicant's claim, we believe the application is premature. The national Aviation Policy framework has yet to be published, even in draft, and the Airports Commission has yet to report on how all London airports should develop. The planning decision should be made only when these are available.

## **2. “Could have significant effects beyond their immediate locality”**

We are concerned about the environmental impact of the airport's expansion on the AONB should the application be approved. The application and expansion plan make no mention of anywhere beyond the immediate airport environs. No account has been taken of the duty to protect all those parts of the Chilterns AONB affected by increased overflying, by day and by night.

Nor has any account been taken of how increased Luton air traffic would be merged with the Bovingdon Hold and Heathrow traffic, both of which affect not only this parish but also a significantly broader area of the Chilterns AONB.

## **3. “Give rise to substantial regional or national controversy”**

The expansion plan attempting to justify this application includes a number of controversial features. For instance:

- its forecast of increased demand for air travel,
- its vagueness in describing the increase in air traffic movements and its management,
- its forecast of increased employment,
- its disregard of any duty to protect the broader AONB.

We have two further reasons for our request:

## **4. This is a Nationally Significant Infrastructure Project.**

The application, together with the expansion plan upon which it is predicated, should be submitted as a Nationally Significant Infrastructure Project, if only to scrutinise how and when the airport plans to increase passenger throughput to more than 18 million passengers a year.

## **5. Openness of government and clarity of decision-making.**

The application is currently before Luton Borough Council, which has a contractual relationship with the Airport and is a major beneficiary of approval. While not doubting the safeguards built into planning decisions when the deciding authority has an interest in the outcome, we believe this application is so significant that an independent body should determine the application, for the sake of open government and clarity of decision-making.

All in all, the application and all its supporting material constitutes a Nationally Significant Infrastructure Project and must be scrutinised in a national context, matching its economic and environmental impact, which reaches way beyond the boundaries of Luton Borough. The decision must be taken by a body manifestly independent of the outcome and with the expertise and perspective appropriate to the regional and national significance of the issues involved. The Planning Inspectorate is just such a body.

For your further information we attach our response to the airport's consultation on its expansion plan.

Yours faithfully,

Mrs Susie Bell  
Clerk to the Council

cc: Nick Rose, Chiltern District Council; Patricia Birchley, Buckinghamshire County Council; Cheryl Gillan MP; Luton Borough Council; Chilterns Conservation Board; LLATVCC

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