

CHOLESBURY-CUM-ST LEONARDS PARISH COUNCIL

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Garners,
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Future Luton Optimisation,
Freepost RSUB-UEZB-SYXJ,
GL Hearn,
20 Soho Square,
London W1D 3QW.

Public Consultation on Proposals for Luton Airport Optimisation.

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.

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.

We thank you for the chance to comment, especially since you are under no obligation to offer it. However, your offer is devalued by the short timeframe of six weeks, rather than the nationally recommended twelve, and inadequate supporting information. Your thirteen page document is very pretty but the sparse text occupies barely half of the space and concentrates on development within the airport boundaries and the ground transport infrastructure supporting it. The scant mention of the wider environmental issues is unintelligible to the man in the street, or under the flight path.

Our response to your questionnaire is below. In brief, we are opposed to your proposals.

We have a number of questions for you, which you will find, underlined, in answer to your question 19. The council looks forward to your early reply.

Yours faithfully,

S H Bell
Clerk to the Council
26 March 2012.

This council's response to the futureLuToN questionnaire.

We have chosen not to use the multiple choice options you offer.

The emerging preferred option

1. Overall, how do you feel about the emerging preferred option for the optimisation of Luton Airport?

Deeply concerned, especially since no mention is made of the duty to protect the Green Belt in general and the AoNB in particular. The absence of an Environmental Impact Assessment is a severe deficiency.

2. How do you feel about the proposal to increase the capacity and efficiency of the taxiways as outlined in the emerging preferred option?

Not being a close neighbour to the airport, we express no opinion.

3. How do you feel about the proposal to increase the number of stands as outlined in the emerging preferred option?

Not being a close neighbour to the airport, we express no opinion.

4. How do you feel about the proposal to serve the new stands with piers as outlined in the emerging preferred option?

Not being a close neighbour to the airport, we express no opinion.

5. How do you feel about the proposal to increase the capacity of the terminal as outlined in the emerging preferred option?

Deeply concerned. The justifications are contentious, especially given Luton Borough's previous statement that passenger throughput should not be the measure of capacity, since it cannot be controlled (Development Brief, 2001.)

6. Please provide any other comments specifically on the emerging preferred option.

You consider only close neighbours of the airport and disregard the other communities who would also be severely affected by increased noise and air pollution.

Surface Access

Not being a close neighbour to the airport, we choose not to answer questions 7 – 14, other than to say that we sympathise with our fellow communities in the Green Belt and the AoNB, who are unanimous in finding the environmental impact unacceptable.

Effects

15. We have shown you a predicted noise contour for the airport serving 18 mppa in 2025, taking into account the expected improvements in aircraft noise over that period. In your view are there any other factors we should be taking into consideration?

You omit any explanation of your assumptions about types of aircraft, frequency of flights and numbers of passengers carried on each and how those compare with today's figures.

Your noise contour maps show only the area immediately surrounding the airport. You make no mention of the impact of your proposals on more distant communities and amenity areas already affected by Luton air traffic noise, in particular those high up in the Chilterns.

You provide no evidence for your claim that aircraft noise will improve over that period. We fear noise levels will actually increase as newer, larger aircraft come into service, and that noise would occur more frequently than today as the number of flights increases.

Our visitors and residents perceive aircraft noise in terms of frequency of overflights and the level of noise of each. Your 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.

You make no mention of control of night flights.

16. Part of the assessment will be on aircraft ground noise. In your view, where do you think we should be assessing noise from aircraft on the ground?

Not being a close neighbour to the airport, we express no opinion.

17. We have outlined the potential increase in the number of jobs as a result of increasing the capacity at the airport to 18mppa. In your view, what other factors should we be considering in terms of economic impacts?

This parish will not be affected by changes in the number of jobs, but we note that your calculation of job generation is contentious. Historical figures from Annual Monitoring Reports show the increase would be around half the amount you claim. Moreover, you do not explain how you have taken into account increases in automation and employers' efforts to reduce staffing. Your business case is flawed. We sympathise with those calling on you to substantiate your forecast.

18. We have provided a list of areas we are assessing for environmental effects; in your view are there any others we should be considering?

All land areas under any flight path into or out of Luton airport in which an aircraft might be ascending, descending or stacked.

Any other comments

19. In addition to the questions above, do you have any further comments to make on our emerging preferred option?

- **The words “Outstanding Natural Beauty” do not appear in your document, not even individually, let alone as a phrase. How would you preserve the amenity value and tranquillity of the Chilterns AoNB?**
- **The six weeks consultation period is too short. We are pleased to note that you “welcome any comments and feedback on the emerging preferred option so that these can be taken into account as the proposals are further developed.” Will you therefore refrain from applying for planning permission while questions from respondents remain unanswered?**

- Why is there no detailed assessment of the environmental impact provided as part of the consultation? How can you consider your consultation credible without it? When do you intend to publish it for consultation, and for how long?
- By your own admission, the consultation document is deficient. When will the public be able to comment on the seven items on page 13 you have yet to assess, namely “Noise (air noise, ground noise, surface access noise), Air quality, Land quality and ground conditions, Cultural heritage, Ecology and biodiversity, Water resources (including flooding and surface water drainage and water quality), Socio-economic effects, including jobs?”
- How would increased Luton air traffic be incorporated with Heathrow air traffic and the Bovingdon Stack? Whom have you consulted about this?
- On what are your noise contour maps based? What assumptions have you made about types of aircraft, frequency of flights and numbers of passengers carried on each? How do those compare with today's figures?
- You make no mention of restrictions on night flights. As a minimum we wish to see Luton Airport subject to the Night Noise Policy set by the Department for Transport for other “London” airports. How would night flights be restricted?
- How will you take account of the government's national aviation strategy, to be published later this year?