



We care for the Chilterns

16 December 2019

London Luton Airport Ltd
Future Luton LLAL
Luton

Dear Sir/Madam

Future Luton – Statutory Consultation

The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns Hills, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and areas of Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.

The site is wholly located within the Chiltern Society area and our principal concerns with the proposed London Luton Airport expansion relate to incursions into the Green Belt, the loss of accessible open countryside, and the effects of increased aircraft movements above the Chilterns AONB.

More specifically, our objections to the scheme are as follows -

1. The expansion of the airport would lead to increased flights which would have impacts on the tranquillity of the Chilterns AONB.
2. The expansion would lead to incursions into the surrounding Green Belt
3. The loss of valuable public open space and habitats at Wigmore Valley Park would be unacceptable.
4. Insufficient assessments have been made of potential impacts on the AONB

The Society's main objection to the expansion of the airport is in relation to the likely increase in flights over the Chilterns AONB to the west of the airport. Whilst we note that the reconfiguration of flightpaths is not part of the current proposals, increased noise is an inevitable consequence of the proposed substantial increase in the number of passengers from 18 million to 32 million. We understand that the maximum movements will increase from 37 per hour to 50 per hour and modelling has shown it is possible within existing procedures, subject to having sufficient taxiway and apron infrastructure. This can only lead to a significant increase in flights over the Chilterns as they are so close to the end of the runway. It would be the combination of increased flights from both Heathrow and London Luton that could have a significant impact on the tranquillity of the AONB and its enjoyment by residents and visitors. With the recommendation that the Chilterns could become a new National Park, there may be increased pressure for quiet recreation.

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We note the very significant opportunities that future airspace modernisation will present for allowing earlier and less constrained climb, and thus reducing noise impacts, and this is welcomed. Also, the opportunity should also be taken to amend routes to reduce overflight of the AONB, in the same way that potential adjustments to take flightpaths away from the population and to provide periods of respite are also being assessed.

Until the review of flightpaths is undertaken it is not possible to demonstrate what the impact would be on the AONB. This would need to be addressed through a detailed Environmental Impact Assessment. It is essential that the physical expansion of the airport and the changes to flightpaths are undertaken together. The Society would continue to object to the proposals unless it can be demonstrated that noise and disturbance within the AONB can be reduced by careful management of flightpaths and climbing gradients.

We note from the consultation that it is proposed to maintain a restriction on night flights and this is welcomed. However, the number of night flights is still very high. As well as night quota there is an additional limit for 0600-0700 of 7000 movements annually, which equates to about 20 in that hour. It may be preferable to increase capacity slightly in that period, and have a tighter regime during the night time.

The report states that recent growth has been towards the high end of DfT forecasts, especially in the London area. Given increased awareness of climate change and potential to change travel patterns, this does not necessarily imply such growth will continue, indeed it may have been a temporary 'bubble', unless DfT forecasts are fundamentally flawed. Since not all these passengers will live in the south, this above-average growth in the London area could be used to highlight the excessively London-centric nature of airport growth and the benefits of spreading growth more evenly.

In relation to the expansion of the airport itself, we are very pleased to see that the previous Option 2 to the south of the runway has been discarded. However, we have a number of remaining concerns in relation to the preferred option. These are set out below.

The Airport is located immediately adjacent to the Green Belt along both the eastern and southern boundaries.

The preferred option would locate a new terminal, additional commercial development and car parking to the north of the runway, immediately adjacent to the existing airport development. This would lead to the loss of Wigmore Valley Park and lead to a significant incursion into open countryside, including part of the Green Belt to the east of the North Hertfordshire boundary. Wigmore Valley Park is a significant area of public open space, which provides an important recreational space for use by local residents. It was developed from a former waste site and has been identified by Luton Borough Council in their Local Plan as both an Area of Local Landscape Value and a County Wildlife Site.

The Society's view is that the loss of Wigmore Valley Park is unacceptable due to landscape and wildlife impacts. It is clear from visiting the site that to build up the land in the park to create an apron and taxiway that are on a level with the runway would require a significant amount of soil to be removed from the existing Wigmore Valley Park, creating a major change to the landform in this area.

The proposed car park would be created in the area where the spoil has been removed and the excavations would extend into the existing Green Belt. Whilst we are pleased that the likely fencing and floodlighting would be outside the Green Belt, there is potential for this to have a negative impact on adjacent open countryside.

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The fuel line connection facility would also be located in the Green Belt and will require careful design to minimise its visual impact. Further consideration should be given as to whether the facility could be located within the Luton Borough boundary and therefore outside the Green Belt.

Whilst the addition of a new park in the Green Belt to compensate for the loss of Wigmore Valley Park would not be unacceptable in terms of openness of the Green Belt, we do not consider that it could provide an adequate replacement for the existing park and associated County Wildlife Site over a reasonable period of time. The new park would also be located close to the approach to the main runway, so would suffer excessive noise and disturbance, as well as air quality issues, due to planes landing and taking off. It would also be located further away from local housing areas, reducing its convenience as an open space and possibly encouraging increased car use.

Our view is that the phasing of the development must be such that the new area of parkland is created before the main airport works commence. This would maintain a continuity of public open space as well as allowing the parkland landscape more time to establish.

The adopted Luton Borough Plan shows an employment development site to the east of Wigmore Valley Park. This is not shown on your proposals and we are concerned that the expansion of the airport would lead to increased pressure to develop employment uses within the Green Belt to the east of the North Hertfordshire boundary. It is also unclear from the plans how the development of the airport would relate to the proposed development of New Century Park and the cumulative impact on the local landscape and biodiversity.

The main report and the PEIR do not consider the expansion of the airport in relation to the Chilterns AONB. The AONB is a landscape designated as being of national importance. Your company, as a statutory undertaker, has a duty to have regard to the purpose of conserving and enhancing the natural beauty of the AONB under Section 85 of the Countryside and Rights of Way Act 2000.

Whilst the airport site is not located within the AONB, a Landscape and Visual Impact Assessment should be carried out to consider any impacts on the setting of the AONB, and any views to and from the AONB, which is located to the north and west of the site. Whilst the PEIR recognises that the AONB is only 5km away there is clearly a need for much more detailed assessment of potential landscape impacts.

We welcome the intention of the airport to be zero carbon by 2050, but it is unclear how it is intended to achieve that. The use of energy efficient materials and solar panels is welcome, although the siting of the panels would need to be carefully considered.

The proposals include new planting of trees and hedgerows both on and off site and this is welcomed to provide some mitigation for the harm to the Green Belt as a result of the terminal. We would expect the site to be surveyed in detail to ensure that if tree planting is undertaken it does not cause harm to any more important types of existing habitat. We would expect structural landscaping to be introduced rather than individual trees.

The development of the site should be landscape-led and should aim to reduce visual impacts, enhance landscape character where possible and create high quality wildlife sites and linking wildlife corridors. In particular, the landscaping of the new car park should be carefully designed to reduce its visual impact. With the car parking being sunk down due to spoil removal, there is an opportunity to create structural landscaping around the edge to reduce its visibility from the surrounding area. The car park itself could also be broken up by tree planting and other landscaping.

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Careful consideration should also be given to the quantity and design of lighting of the car park. Where possible, bollard lighting should be used rather than tall floodlighting to minimise light spillage into the surrounding area. Where floodlighting has to be used it should be designed to point downwards and be shrouded to reduce light spillage into adjacent wildlife habitats.

The Society welcomes the commitment to target a 10% biodiversity net gain through the whole of the proposed development. This needs to be assessed using a nationally recognised methodology. However, it is important to ensure that the habitats of highest biodiversity are retained and not adversely affected, and particularly the County Wildlife Sites and ancient woodlands.

The Chilterns is an important area for quiet informal recreation, including the Chilterns Way, the Chilterns Cycleway and the North Chilterns Trail. Impacts on these in terms of inter-visibility and disturbance will also be important considerations in designing the scheme.

Further consideration needs to be given to potential impacts of increased traffic and additional road infrastructure on the Chilterns AONB and the open Chilterns countryside surrounding the airport. Whilst it is proposed that 45% of journeys will be made by public transport from 2029, there will still be a major increase in traffic in the local area as a result of a large increase in the number of passengers and the creation of larger car parks with an additional 7,750 parking spaces.

In conclusion, the Chiltern Society is opposed to any expansion of Luton Airport which involves new terminal facilities or a significant increase in flights due to anticipated unacceptable impacts on the Green Belt, open countryside and the Chilterns AONB. Any future application would, in our view, need to be accompanied by an Environmental Impact Assessment, which should include a Landscape and Visual Impact Assessment and a detailed assessment of impacts on the AONB and Green Belt. A detailed 'very special circumstances' case would need to be demonstrated to allow inappropriate development in the Green Belt.

The Chiltern Society would be keen to work with you in considering the potential environmental impacts of the expansion of the airport and any potential opportunities for mitigation. Please could you keep us informed as your proposals develop.

Yours sincerely

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