



Luton Airport Expansion Statutory Consultation Chiltern Society Questionnaire Responses – March 2022

Our expansion plans

5. Which of the following best reflects the extent to which you support or oppose the expansion of London Luton airport? Please select one option:

Strongly oppose

5a. Please provide us with the reasons for your response in the box below:

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 Chiltern Society strongly objects to the further development of Luton Airport. Further massive expansion of an airport in the south east cannot be consistent with the Government's 'levelling up' policy.

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.

In the Landscapes Review (Glover Report), and the Government's recent response, the Chilterns have become 'more important' with more emphasis on its conservation, addressing climate change and nature recovery. The airport expansion goes against this.

We also note that Natural England's current Designations Programme includes a proposal to extend the designated area of the Chilterns AONB. We understand that land to the south and east of Luton in the vicinity of the airport could be included in the area of search for designation; indeed, the Chiltern Society considers that land in this area is of sufficient quality to meet the 'natural beauty' criterion for designation and will be advocating for its inclusion in the 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 and air quality in and around the airport.
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 (including the possible area of expansion).

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 19 million to 32 million. 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.

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.

Given the twin crises of climate change and nature loss, which are now acute, it is wrong to be expanding airport facilities into open countryside and encouraging more people to fly. Reducing aircraft use and less burning of fossil fuels are essential for the long-term future of the planet and to reaching the Government's target of Net Zero by 2050. Once this realisation sinks in, the government will be impelled to constrain levels of aviation activity through regulatory and fiscal measures, since any move towards alternative lower- or zero-carbon fuels is long-term and will only ever be partial. The sectors chiefly catered for by airports like Luton – mass low-cost and leisure travel, and private jets – are those which are likely to be most affected by pro-rata carbon taxes. This requires a fundamental shift in the business model away from continued expansion of passenger numbers.

Effective government measures on climate change, combined with the alteration to people's travel patterns triggered by the Covid pandemic and greater general environmental awareness, would thus render a forecast of 32 million passengers per annum highly doubtful. Given the issues of climate change etc, no airport expansion should be considered until fossil-free fuels are much more developed.

Why grow?

Please see section 2 of the Consultation Brochure, which outlines the reasons why we are proposing to expand the airport. Further detail can be found in our Draft Need Case document.

6. Do you have any comments on our Draft Need Case which sets out the reasons for our proposal to expand the airport? Please add your comments in the box below:

The reasons for expanding the airport are based almost entirely on continuing economic growth. Unrestrained growth is not necessarily a good thing and can lead to greater discrepancies between different areas of the country. Continuing growth across the south east cannot be sustainable in the long term. The need case needs to recognise the importance of addressing climate change and ensuring a balanced approach to sustainability issues. We cannot continue to promote economic growth at the expense of everything else.

Whilst we understand Luton's ambitions for growth, it should be tempered by the need to be in keeping with environmental imperatives and commensurate with developments in propulsion and construction technologies that effectively reduce dependency on, and use of, non-renewables.

The Covid-19 pandemic has increased the number of people taking 'staycations' and has led to a boom in the use of online communication, thus negating the need for many overseas leisure and business trips. The economy needs to capitalise on these trends rather than trying to encourage increased air travel, with its significant impact on climate change. It should be a case of being smarter how we use the existing airport capacity, rather than planning a huge increase.

Benefits of expansion

Please see section 2 of our Consultation Brochure, which explains the current benefits of the airport and the additional benefits that we believe expansion would bring to local and regional communities. Further details can be found in our Draft Need Case document, and our Draft Employment and Training Strategy document.

7. Do you have any comments or suggestions for how we might maximise employment, skills, community and social benefits and training opportunities to help benefit neighbouring communities? Please add your comments in the box below:

The report focusses on the economic and community benefits of developing the airport, but makes no mention of any benefits or disbenefits to the local environment or on addressing climate change, or to the local population. The proposal must embrace sustainability principles and make a positive contribution to achieving Net Zero by 2050.

Our proposed design for the airport

Please see section 3 of our Consultation Brochure, which outlines our proposed design for the airport. Further details can be found in our Works Description Report.

We have made changes to our design since the 2019 statutory consultation. These are summarised in section 3 of the Consultation Brochure and include:

- new sustainability design measures including making Terminal 2 a net zero building and rainwater harvesting
- changing the approach to Wigmore Valley Park to preserve more trees, biodiversity and heritage assets
- reduction in the size of the airfield platform and the amount of earthworks
- other improvements such as reconfiguring taxiways, realigning the position of the new stands, reducing the size of hardstanding associated with the engine run up bay and a new access road to the Fire Training Ground
- additional enhancements to Terminal 1

8. Do you have any comments on our design proposals for the scheme? Please add your comments in the box below:

We are pleased that there have been some amendments since 2019 to reduce the environmental impacts of the proposals. The key ones from our perspective are retaining more habitat and landscape features in Wigmore Valley Park; reducing the scale of the earthworks required to bring the platform to the level of the runway; and reducing the footprint of the car parking. These changes are essential as the whole area around the airport could be proposed as a potential extension to the Chilterns AONB. It is also essential that impacts on the adjacent Green Belt are minimised.

If areas of Wigmore Valley Park are to be built on, it is essential that the new areas of parkland, open space and habitats are created at the very beginning of the development so that they can become established prior to the destruction of the existing park. As well as this area being proposed to be 10% larger, it also needs to demonstrate through appropriate metrics that there would be at least a 10% Biodiversity Net Gain. There is a significant risk of a time lag between existing habitats being removed and new habitats becoming fully established. A long-term Management Plan needs to be developed and sufficient resources and management mechanisms put in place to ensure the long-term development of the new park.

Getting to the airport

Please see section 4 of the Consultation Brochure, which explains our proposals to enable people to get to and from the expanded airport including:

- Airport Access Road
- Junction upgrades / other road improvements
- Luton DART extension
- New separate coach station will be provided at Terminal 2
- Targets for public transport mode share
- User charging for car park and forecourt access

Further details can be found in our Getting to and from the Airport - Our Emerging Transport Strategy document.

9. Do you have any comments on our Getting to and from the Airport - Our Emerging Transport Strategy document? Do you have any suggestions for how we can maximise access to the airport by public/sustainable transport modes? Please add your comments in the box below:

The Society is concerned about the impacts of increased traffic to and from the airport and considers that this deserves greater emphasis. This would be both in terms of the construction of a viable network, which presumably will precede the airport expansion itself, and in terms of the resulting inevitable increase in surface traffic 24/7, and its impact on the environment, on noise, air and light pollution - largely predicated on private transport rather than the provision of an effective and sustainable public transport system. The proposal of 45% of journeys being made by public transport by 2029, for example, is all very well, but it will need some positive incentives to change behaviour, otherwise it will be just wishful thinking.

Building our airport

We propose to construct the scheme in two phases. Phase 1 would include expansion of the existing Terminal 1 and additional aircraft stands and car parking. Phase 2 would see the construction of the new Terminal 2 and associated facilities.

Please see section 5 of the Consultation Brochure, which outlines how we propose to build our airport expansion. Further detail can be found in our Works Description Report.

10. Do you have any comments on our proposals for constructing the scheme? Please add your comments in the box below:

No comments

11. Our proposals also include a draft Code of Construction Practice which sets out in draft the measures we will take to minimise the effects of construction. Is there anything else you would like us to consider as part of this? Please add your comments in the box below:

No comments

The environment

Please see section 6 of the Consultation Brochure, in which we identify the key environmental effects that expanding the airport could have, and how we are proposing to manage and mitigate them. Further detail can be found in our Preliminary Environmental Information Report (PEIR).

12. Do you have any comments on the environmental effects of expansion and how we propose to manage and mitigate them? Please add your comments in the box below:

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 a much more detailed assessment of potential landscape impacts. The implications of potential extension of the AONB should also be addressed.

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, where possible, by tree planting and other landscaping.

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. Given the proximity of the Chilterns and the likely significant impacts on local communities, we would like to see a 20% biodiversity net gain.

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.

The air quality section deals with impacts of the airport itself, but fails to assess the impact of many thousands of flights arriving and departing each year. Our view is that this cannot be treated separately to the airport itself.

In terms of biodiversity, we are pleased to see a commitment to preparing a Landscape and Biodiversity Management Plan.

In the landscape section, we note that significant adverse effects have been predicted on the landscape character of the surrounding area, as well as on the Chilterns AONB as a result of additional air movements.

We have reviewed the information available on flight paths. We note that changes to flightpaths, and terminal expansion (and ancillary work), as proposed here, are two independent processes. However, it is not acceptable to say that the airport will be net zero if the impacts of the flights are not considered.

As far as we can see, although it is not clear, Luton are not proposing any more flights than currently **theoretically** possible or allowed (or at least not significantly so), but just assuming a greater proportion are commercial flights (rather than business jets carrying one or two people, which fill a proportion of the slots, and have formed quite a big segment of Luton movements at times, although are

gradually getting squeezed out to smaller airfields such as Farnborough, Biggin Hill and even places like Oxford); and that these commercial flights will also tend to use bigger aircraft than now; hence more terminal space, car-parking, etc. required.

In practice, we understand the runway is not currently operating at 100% capacity; and because the business jet movements are very ad hoc and variable, there tend to be quiet and busy days in terms of the number of aircraft movements. Commercial flights, by contrast, tend to operate on a regular schedule, so the slots they secure will tend to be used on a daily or near-daily basis across a season. So, if Luton's growth predictions come true, and the number and proportion of commercial flights grows; and the terminals are big enough to accommodate the extra passengers; then there will in actuality be more flights than now. And, probably every day will be similarly busy.

On the whole, commercial jets are a bit noisier than business jets, but not vastly so. But, if the low-cost airlines that dominate Luton continue their trend to more modern and larger aircraft, these newer generation aircraft (A321 Neos, and 737Max) are actually a little quieter than older generation commercial aircraft. Either way, aircraft noise will continue to be a key issue for the AONB and the area surrounding the airport.

Because aircraft routes won't change as a direct consequence of these proposals, it will be essentially the same people as now that will experience the noise, and at the same heights and thus volume – but there will be more of them. However, one less obvious consequence of traffic levels increasing, and getting closer to runway capacity, is that there is less scope for short-cuts and expedited climbs, and flows get more regimented – so less “random” scatter of flight paths and noise.

The current aircraft routes from Luton are largely determined and built around those from Heathrow, plus Stansted, Northolt etc. in a very complex area of airspace. These have been long recognised as ripe for revision, as old-fashioned, and based on old technology and sluggish performance of older aircraft, and there have been a couple of aborted efforts to revise them. This is still very much a live issue, and any revision that is likely to allow for faster climbs, and a resultant reduction in noise would be welcome. However, this would inevitably also bring aircraft over different areas, some currently unaffected.

We note that new **arrival** routes for Luton (designed to reduce conflicts with Stansted arriving and departing aircraft) came in during February 2022. These create a new holding stack, just for Luton, further north, and will lead to a subtle redistribution of arriving traffic, possibly reducing impacts on the north-eastern corner of the AONB. However, it will depend how many aircraft will follow the whole route, or if short-cutting as now is still employed a lot of the time.

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.

Page 140 refers to the airport being in the catchment of the River Mimram. This is one of the important chalk streams of the Chilterns, which is particularly susceptible to reduced flows and increased water pollution. In devising the drainage for the scheme, we ask that the needs of the chalk stream are specifically addressed in the Environmental Impact Assessment.

We are proposing a 'Green Controlled Growth' framework which would ensure that the airport is required to operate within specified 'limits' for air quality, noise, surface access and greenhouse gases. Section 3 of the Consultation Brochure describes the approach and further detail can be found in our Draft Green Controlled Growth Proposals document.

13. Do you have any comments on our Green Controlled Growth approach? Please add your comments in the box below:

We are pleased to see an enhanced and more structured approach to addressing environmental impacts.

However, it is essential that the impacts of the flights from the airport are considered as well as the operation of the airport itself. This is particularly important in relation to assessing greenhouse gas emissions as a result of thousands of flights per year, and the noise impacts on the area immediately around the airport, including the Chilterns AONB.

Also, we would have expected the GCG to include measuring the success of biodiversity enhancements through Biodiversity Net Gain. Nature is in crisis, so it essential that major enhancement projects like the new Wigmore Valley Park are successful in replacing habitats lost and creating environmental and leisure benefits for the future. It is essential that as much as possible of the existing park is retained and that the resulting new area of park is at least 10% larger than the existing park. As the park is developed, we would expect more ambitious targets to be developed and implemented through a comprehensive Landscape and Biodiversity Management Plan. GCG should provide a driver for this.

Open space

Please see section 6 of the Consultation Brochure, which explains our approach to landscaping and open space as part of our plans to expand the airport. Our proposals include landscaping and ecology improvements, including the replacement of existing and planned public open space at Wigmore Valley Park.

14. Do you have any comments on our open space and landscaping proposals? Is there anything you would like us to incorporate? Please add your comments in the box below:

The Airport is located immediately adjacent to the Green Belt along both the eastern and southern boundaries. New buildings in this area should be kept to an absolute minimum.

The proposals 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. We understand that this volume has been reduced by 50%, but the resulting impact would still be significant and harmful to existing open space, landscape and biodiversity.

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.

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.

Compensation and Community First Funding

Section 6 of the Consultation Brochure outlines our compensation proposals. We recognise that some people who live in, or own property near, the airport will be affected by its expansion. We have prepared a Draft Compensation Policies and Measures document to explain our general approach to property and land acquisition, which also sets out the discretionary compensation available for eligible properties.

Since the 2019 statutory consultation we have reduced the thresholds at which people can apply for noise insulation - this means that many more people are now eligible. These discretionary offers are intended to enhance the terms available under the statutory compensation code for eligible properties, but do not change your statutory rights.

15. Do you have any comments on our proposed compensation policies and measures? Please add your comments in the box below:

No comments

In our last statutory consultation in 2019 we set out how we wanted to go further than simply mitigating the negative effects of expansion and proposed a new fund which we called FIRST.

We still propose to establish a similar fund, in line with our social and environmental ethos, we now propose more focus on areas of high deprivation in the region and by helping to finance local decarbonisation projects. As well as fitting better with our own values, we also believe this approach is better aligned with the national levelling up and decarbonisation agendas promoted by the government. To better reflect this revised approach, we have renamed the fund 'Community First'.

You can read more about our Community First proposals in our Compensation Policies and Measures document.

16. Do you have any comments about our proposals for the Community First scheme? Please add your comments in the box below:

No comments

Further comments

17. Do you have any other comments about our proposals to expand London Luton Airport? Please add your comments in the box below:

The Society finds it absolutely incredible that anyone (government, airport operators, economic bodies, councils) can contemplate unrestrained (or indeed any) growth in aviation, and think it is compatible with addressing the climate emergency; and thus represent it as a good thing. Whatever the truth of the claims about economic benefits and jobs growth, we do not agree with the assessment that all growth and all jobs are "good" and equivalent, regardless of what damage they do. The risk is that it is a self-fulfilling prophecy, with more airport capacity triggering more flights, just like building roads.

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.

Colin Blundel
Planning Officer, Chiltern Society
30 March 2022