

Standing up for Hertfordshire's countryside

Future Luton Team
London Luton Airport Ltd

Our Ref:

Your Ref:

Email: futureluton@llal.org.uk

13th December 2019 (by email)

Dear Future Luton Team,

FUTURE LUTON - London Luton Airport Expansion Consultation Dec 2019

CPRE Hertfordshire and CPRE Bedfordshire strongly object to the expansion of London Luton Airport from 18 to 32 million passengers per annum. No application for Development Consent Order should be put forward to the Planning Inspectorate for such a flawed approach. Our objections are based on matters of both principle and detailed points of concern.

1. **Climate Emergency:** The application flagrantly ignores the reality of the Climate Emergency and the impacts of rapidly expanding aviation, the fastest growing source of Green House Gas (GHG) emissions. The 103,000 additional flights a year, a 60% increase on current levels will result in hugely increased emissions.
2. **Noise and Air Pollution:** The expansion will cause substantive and further harm to the surrounding countryside and towns by increased noise and air pollution. Further adverse noise impacts are inevitable and underestimated in the submission documents.
3. **Traffic:** Significant congestion will be caused by increases in traffic at the site and on approach roads. Additional road building is proposed as well as the provision of an additional 7,750 parking spaces. The effects on the local road network are greatly underestimated. The whole approach lacks the required emphasis to sustainable transport.
4. **Landscape:** Harm to the immediate countryside by landscape, major earthworks and loss of open space and recreational areas. The increased apron, car parking and airport activity will bring additional light pollution to a wide area of countryside.
5. **Economic Forecasts:** That the economic benefits of the scheme are greatly overestimated and do not justify the harm.

6. **Public Consultation:** This fails to test public opinion properly. Responses are not being openly shared online and the format of questions frustrates objection.

1. There is a Climate Emergency and the proposed airport expansion is incompatible with it.

The work of the Intergovernmental Panel on Climate Change (IPCC) in 2018 underlined how, despite current efforts, we are on course for in excess of 2 degrees C warming above pre-industrial levels and the catastrophic consequences this would entail. The IPCC highlighted an urgent need to halve GHG emissions within the next ten years. The UK Parliament and many local councils, including those of Hertfordshire and Bedfordshire have declared climate emergencies. The UK has now adopted a Zero Carbon target of 2050. CPRE, other NGO's, and political parties in the UK General Election, are proposing this be accelerated to 2045 or even 2030.

The proposed growth of air traffic at LLA by 103,000 flights, to 240,000pa, represents a 60% increase. It is the growth of flights which represent by far the most significant increases in GHG. This is neither 'sustainable growth' nor 'sustainable development'. The proposed expansion, producing an estimated 1.3m tonnes of carbon emissions a year, is fundamentally flawed and completely at odds with the urgent action required to respond to the Climate Emergency, as well as the public mood for action. Aviation CO2 emissions are significant and growing fast. A single flight from London to New York emits the equivalent CO2 for an average person's home heating in a whole year. If aviation emissions were ranked alongside those of countries, aviation would be ranked the sixth largest emitter in the world. International forecasts for aviation are that it will increase two or four fold from 2% of global emissions to 4-8% by 2050 without major policy interventions. Without a change of policy, UKs CO2 emissions from aviation could grow from being 7% to 25% of total GHG emissions by 2050. The UK, as the third largest aviation market in the world, should be leading the way in changing policy and must do so to meet its declared goal.

The UK's Committee on Climate Change (CCC) in May 2019 agreed that action to achieve the statutory target of net-zero emissions (removing as many greenhouse gas emissions as we produce) by 2050 is currently falling far behind what is required. The CCC recommended a 2050 date to achieve Carbon neutrality, subsequently approved by the UK Parliament. The CCC report outlined a scenario that allowed for limited growth in air traffic to 2050 of 25% (well below that being proposed for LLA) but also recommended constraints on airport capacity. Luton Airport Expansion Plans are therefore at odds with the latest recommendations of the CCC.

Luton's plans are based on challengeable forecasts of growth from 2017 which confuse 'demand' with 'need'. There is potentially the 'demand' for the doubling of air traffic in the south east UK by 2050, but there is clearly a 'need' for restraint with regard to the

Climate Emergency. How restraint is applied isn't determined in the absence of any up to date National Aviation Policy. The Airport National Policy Statement June 2018 supports (but doesn't demand) the best use of existing runways, acknowledging a minority reject the need for expansion. This NPPS was based on the Airport Commission's Report July 2015 which said a new runway and air traffic growth could still take place within the national obligations of the Climate Change Act 2008, when only an 80% carbon reduction was sought by 2050. The target now is of course 100%, not 80%. Furthermore, national policy is in a vacuum and fails to connect the interrelated aspects of Aviation Strategy, Climate Action and Carbon Targets. No government policy has revised carbon targets or reviewed Airport and Aviation Policy since the latest IPCC report Oct 2018 or the UK Parliament voted for a Zero Carbon target by 2050, a target that itself may well be further tightened.

The NPPF 2019 refers to the Department of Transport General Aviation Strategy 2015, a document which makes no mention of climate change or carbon reduction targets. Implicitly acknowledging the inadequacies, the government publication 'Beyond the Horizon' 2016 referred to the need to set the right carbon and environmental framework in developing a new aviation strategy. A Government Consultation 'Aviation 2050' 2018 also acknowledged the need to negotiate long term international goals on emissions with the ICAO (International Civil Aviation Organisation). It expects any new EU and Global emissions goals to be the drivers for emission reductions. The robustness of measures for offsetting and carbon trading are widely questioned by Climate Scientists.

CPRE is calling for a moratorium on airport expansion, the inclusion of aviation in UK carbon budgets and for emissions from flights to be reduced and set out in national aviation policy. CPRE would point to 'flight free' campaigns and evidence that people and organisations are questioning their need to fly more than ever before, not least by the example of the campaigner Greta Thunberg. Sustainable strategies for air travel, should align with land use planning strategies and reduce the need to travel. The costs and benefits of flying must be reassessed in the context of the Climate Emergency. Alternatives to flying must be made more attractive by competitive pricing and investment in rail for instance. In Sweden there has been a 5% reduction in flying for the first quarter of 2019, and the awareness of flying's environmental impacts are growing and being better understood. A survey of 6000 people by Swiss UBS (October 2019) revealed that one in five people had cut the number of flights they took over the last year because of the impact on the climate; it expected the growth in air passenger numbers could be halved if such trends were borne out.

As people 'vote with their feet', the old 2017 Department of Transport forecasts of air traffic growth, which are being used to justify the LLA expansion, must be seen as unsound, as well as contrary to the government's own climate obligations. Patterns of air travel are highly variable in any event. Between 2008 - 2013 there was no net growth at Luton. The truth is that government climate action requires future growth to be managed and restricted as a matter of policy. Future growth is not inevitable, forecasts in turn should be dependent on national and international policy approaches to airport expansion, taxes and fuel duties etc which can all influence demand.

There can be no assurance that technologies such as sustainable aviation fuels or low emission aircraft will resolve this matter even though they are being researched. The prospects for a 'technological fix' are all too distant. The higher costs of zero carbon fuels may in any event reduce overall demands for flying.

CPRE does not believe carbon offsetting is an adequate policy response as massive tree planting/carbon fixing etc is already needed to offset historic carbon emissions and address runaway global warming. A recent EU survey suggested that offsetting schemes do not bring the claimed beneficial effects. It should not be used to justify air travel expansion and 'business as usual'.

The global warming effects of non - CO2 emissions, gases aerosol particles etc being injected into the upper atmosphere, are also not fully understood and national and international policy is under review. In its absence a precautionary approach must be taken to environmental harm.

2. Noise pollution will increase and the impacts are underestimated.

Luton Airport is a site located within a tightly packed series of large towns and cities that are already adversely impacted by noise including Hemel Hempstead, Harpenden, St Albans, Stevenage and Luton itself. Areas of countryside in Hertfordshire and Bedfordshire experience a loss of tranquillity on account of the airflight paths with anticipated severe localised impacts on areas such as at Kensworth to the west and Breachwood to the east.

The 103,000 additional flights every year, a 60% increase up to 240,000 flights pa, will, inevitably bring greater noise impacts and damage wider areas of countryside, within Hertfordshire especially. Based on LLAL's Preliminary Environmental Information Report, in the summer quarter, average noise levels around the airport will increase by between 1.2dBA Leq and 3dBA Leq. Hundreds more households will come within 'significant noise level contours' as the noise footprint grows. This prediction itself relies on over optimistic assumptions about 'next generation' quieter aircraft models, an argument previously used to justify growth at Luton of up to 18mppa. In fact, over the last 5 years the approved noise contours have been exceeded and the local Council has failed to enforce the planning conditions. There is no 'given' that the fleets of aircraft using Luton will be universally converted to marginally less-noisy types by any given date - much of the current fleet is relatively young.

The experience of aircraft noise is also much more subjective and intermittent so that the Leq industry standard, which is used to predict averages, is misleading. The 16 and 18-hour average noise levels, which still show a significant increase, do not reflect the existing and forecast increases in intrusion and the human experience of aircraft noise as sudden loud events within longer periods of relative silence. The impacts cannot be properly understood by quoting an Leq average. Calculating the average noise from a number of relatively short

but very loud events amidst longer periods of relative silence doesn't produce anything meaningful as a figure.

The expansion proposals are inconsistent with the National Planning Policy Framework 2019 provisions on noise by new development (Para 180a):

“To mitigate and reduce to a minimum other adverse impacts from new development and avoid noise giving rise to significant adverse impacts on health and quality of life”, (para 180a)

The plans contradict the provisions of Luton Local Plan Policy LLP6, even though that was redrawn to be more favourable to airport growth, which states that expansion proposals should:

‘include proposals which will over time result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents and occupiers and users of sensitive premises in the area, through measures to be taken to secure fleet modernisation or otherwise....’

3. There will be severe yet underestimated impacts on local roads, transport congestion and air pollution.

Luton Airport's public transport links aren't sufficiently attractive and the airport has the lowest levels of public transport use 25% of any airport in the London region. There is a shuttle bus which will be replaced by the DART service connection from Luton Airport Parkway on the London Midland Line, but there will still be no direct rail service to the airport from London as this necessitates a change at Luton Parkway. The area lacks good public transport east to west as bus services are poor and east-west railway routes were lost back in the 1960's. 90% of airport passengers are leisure holiday travellers with luggage, and about 68% of them arrive by car. The proportion has remained fairly static for years despite various 'Surface Access Strategies'. The target proposed is to reduce the proportion to 55%, i.e. with 45% arriving by public transport, but even if this were achieved, based on document figures, it is estimated this would still result in an additional 5.5 million vehicles a year on the local road network, about 14,000 a day. The traffic impacts will be all the greater at peak times.

The congestion would be a result of the level of airport growth being proposed. It also the case that there must be far greater investment in a wider network of sustainable transport modes if the target is to be achieved or improved. CPRE would advocate regardless of any expansion plans, for a much more ambitious target of road traffic reduction with an eventual goal of full sustainable transport use by airport employees and passengers. The plans propose an additional 7,750 car parking spaces which will generate more private car use, congestion and more GHG emissions. The success of DART, already under construction, will depend on its usability, frequency and its fares. Long term if expansion goes ahead, as

the road network is found to be inadequate and congested, this may lead to further pressures for road building around the site and even into nearby countryside.

Traffic to the airport passes through a number of Air Quality Management Areas including Luton, Hitchin, Dunstable and St Albans and these increases will result in further harm to localised problems of air quality.

4. Harm to environment and landscape by loss of countryside, recreational land and light pollution.

There will be a significant expansion of the footprint of development with new buildings, the extended apron for aircraft movement, the new terminal buildings and 7,750 additional parking spaces car parking areas will encroach existing greenfield areas to the east of the airport.

Luton has appropriated the Wigmore Valley Park, a long-established park and nature reserve for this expansion. The Wigmore Valley County Wildlife Site is lost and a second wildlife site seriously impacted. Major earthworks will take place across these areas east of the Luton boundary with an unnatural earth bund up to a height of 20-30m above existing ground levels. All of these elements will expand the footprint of development and harm the local environment and landscape.

Airports operate late into the night and even overnight. The proposed development will result in further and unjustified light pollution

5. Economic and employment benefits

The forecasts of 16,000 new jobs as part of expansion are considered highly unreliable, new jobs growth in the local economy may well result in any event without airport expansion. There is no linear relationship between growth and local jobs and the claim of 700 new jobs per additional million ppa as benefits of expansion is felt to be greatly overstated.

Over the period 2010 to 2018 passenger throughput at LLA increased by 90% (8.7 million passengers per year to 16.6 million) but directly-employed jobs: a proportion of which are part-time; increased by only 26% (8,200 to 10,400). This is significantly below the previous forecast benefits, in the region of 250 jobs per 1 mppa rather than 700 jobs per 1mppa. When the Second Runway at Manchester was proposed this initially promised 55,000 jobs but when subsequently reassessed was found to be less than 6,000.

A statement by Oxford Economics Forecasting (PEIR, Vol 3, Appendix 13-1, para 1.2) states that 'we estimate and forecast the economic contribution of London Luton Airport but we do not make any assessment of the extent to which the contribution identified will be

additional to what would have occurred in the absence of its future development'. This suggests that much of the forecast economic growth may happen regardless and independent of the proposals.

Finally, the airport expansion will add to the tourist spending deficit calculated by the Office of National Statistics at £22bn per year. This takes spending and economic activity out of the country, in the absence of expansion more of the tourist spend would remain within the domestic economy. No account of this effect is made within the submission. A more sustainable alternative strategy would limit overall numbers travelling, retaining local spend, creating more work and employment without accelerating climate change.

6. Consultation Inadequacies

The consultation is on the basis of an increase from 18mppa to 32 mppa, but given the ability to expand the existing terminal operations from 18 to 22.5 mppa, then the overall growth would be more accurately assessed as up to 38mppa (with the new second terminal providing for 14Mppa). This would mean even more flights to the airport, GHG emissions, noise and traffic impacts.

While passenger caps and planning conditions may be suggested as part of any planning permission in practice these are often amended later on. The proposal should be seen and assessed for the overall capacity that is being designed into the proposal, as up to 38mppa rather than the notionally lower figure of 32mppa. This adds to the overwhelming case to object to the expansion.

The submissions are highly detailed and complex but the consultation documents make it difficult to answer simple questions such as what the proposed growth in the number of flights is at the site. The online consultation asks a series of detailed questions, but provides no straightforward question to test the public mood on the expansion. For instance, no question asks whether the respondent support the proposals or not. Why not? Public opinion is not the only test but it is important to assess this given all the local and wider impacts of the development.

A further objection is that responses to the consultation, including some expert submissions, are not being publicly shared online. This would be beneficial especially to members of the public seeking to be informed by more expert and professional appraisals that are fully independent of the applicant.

An alternative approach for London Luton Airport

CPRE Hertfordshire and Bedfordshire, and CPRE nationally, are calling for a moratorium on airport expansion and for the contribution of Air Travel to be added to the domestic carbon budgets due to the Climate Emergency. Any development at existing airport sites should furthermore avoid new road building, sprawl or light pollution.

There is no objection to ground level redevelopment of the existing airport site in itself; the provision of the new DART and other light rail links to improve the passenger experience or jobs provision at the site. Indeed, much airport land is wastefully expended on unsustainable private car travel within existing surface car parking areas; car parking is even expanded by the proposed application.

The LLAL planning strategy is completely at odds with national and local policy, out of date and flawed. It is accepted that currently there is a policy vacuum nationally that creates some confusion for local proposals. Aviation Policy needs to be aligned to broader national obligations and objectives on climate under the Paris Climate Agreement and the UK Climate Change Act.

CPRE recommends that national and local government should be working with LLAL to commission a revised competition of ideas to design a genuinely sustainable strategy for future development of the site. This would include a radical shift away from car dependency, imaginative site regeneration and a cap on further air traffic growth. A greener smarter 'quality over quantity' approach would align with local, national and international climate policy objectives and include:

- Redevelopment solely of airport brownfield land including surface car parks, for high quality energy efficient development at density for mixed-use commercial and residential, including housing for airport staff and priority local needs.
- Road user and parking charges to deliver income streams to re-invest in sustainable transport.
- Reinvest airport income in light rail to link the airport, railway stations, town centre and Dunstable expressway.
- A network of walking and cycling routes to the airport.
- Aim long term for all employees and passengers to arrive by sustainable transport with financial incentives, green travel plans, travel subsidies.
- Require flight operators to automatically price in public transport connections.
- A net zero carbon target for the site including renewable energy within buildings.

Yours faithfully,

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And

Gerry Sansom

Gerry Sansom - Chairman
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