



The countryside charity
Bedfordshire

CPRE Bedfordshire
43 Bromham Road
Bedford
MK40 2AA

Telephone: 01234 880624
Email: info@cprebeds.org.uk
www.cprebeds.org.uk
Registered Charity 1023435

CPRE Bedfordshire's response to the Luton Rising Consultation on the proposed expansion of Luton Airport March 2022

Our response relates to the questions in the Luton Rising on-line consultation form with headings and questions shown in brackets.

1. Introduction (About you Q1 – 4)

- 1.1 This submission is made by CPRE Bedfordshire – the Countryside Charity. We are a Bedfordshire based charity and part of the national CPRE network. We work to protect, promote and enhance our urban greenspaces and countryside in Bedfordshire to make them better places to live, work and enjoy. Our aim is to ensure the countryside is protected for current and future generations.
- 1.2 We are active across the County campaigning against inappropriate development, encouraging sustainable new development in the right locations and providing help and support to local Action Groups.
- 1.3 We have no land or other property interests in the Airport or expansion area.

2. CPRE Bedfordshire position (Our expansion plans Q5)

- 2.1 CPRE Bedfordshire strongly oppose the proposal to expand Luton Airport from 18 million to 32 million passengers per annum and believe that no application for a Development Consent Order should be submitted to the Planning Inspectorate for such a flawed approach. Our objections are based on matters of both principle and detailed points of concern as noted in the remainder of this submission
- 2.2 There is no substantive difference between the present and the previous 2019 proposals despite Luton Rising's assertions that significant changes have been made. In essence, the scale of the expansion proposals and their impacts are similar and have in fact become more damaging with the changing circumstances.



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2.3 Our main areas of concern are: -

1. **Climate Emergency:** The proposals flagrantly ignore the reality of the Climate Emergency and the impacts of rapidly expanding aviation, the fastest growing source of Green House Gas (GHG) emissions. A 60% increase in flights 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. More road building is proposed, as well as the provision of an additional 7,925 parking spaces. The effects on the local road network are greatly underestimated. The whole approach lacks the required emphasis on sustainable transport and detail of how a significant modal shift to public transport will be achieved.
4. **Landscape:** The proposals will result in significant and irreversible harm to the immediate countryside. This includes the Chilterns AONB and the Green Belt. In addition, there will be a loss of open space and recreational areas and irreparable damage to Wigmore Park. The increased apron, car parking and airport activity will bring additional light pollution to a wide area of countryside.
5. **Economic Forecasts:** The economic benefits of the scheme are greatly overestimated and do not justify the harm.

3. Objections to the Draft Need Case (Why grow? Q6)

- 3.1 CPRE considers that the Draft Need Case is out of date and poorly evidenced. The fundamental and long-term impacts of Brexit, Covid and the pressure for action to combat climate change are not reflected in the Business case. It merely represents carrying on blindly and pursuing growth for the sake of it. As such it is fundamentally flawed. Two obvious areas where the Draft Need Case is woefully lacking is its incompatibility with the climate emergency, and the need to rebalance economic development as envisaged by the Government's 'levelling-up' commitments.



Climate emergency

- 3.2 The expansion proposals and Draft Need Case flagrantly ignore the reality of the climate emergency and the impacts of rapidly expanding aviation, the fastest growing source of green-house gas (GHG) emissions.
- 3.3 The work of the Intergovernmental Panel on Climate Change (IPCC) in 2018 underlined how, despite current efforts, we are on course for more than two degrees Centigrade 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 and the UK Parliament and many local councils, including those of Bedfordshire and Hertfordshire have declared climate emergencies.
- 3.4 The UK Government has adopted a zero carbon target for emissions by 2050 with many proposals by political and environmental organisations, including CPRE, for this to be accelerated.
- 3.5 It is not yet known how and where carbon reduction will occur, and the results of the Government's Jet Zero Consultation are still some way off. What is clear is that the aviation industry and any expansion proposals will need to be considered very carefully as part of this.
- 3.6 The proposed growth of air traffic at Luton Airport represents a 60% increase in flights which will result in a massive increase in GHG emissions. 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.
- 3.7 Luton's plans are based on challengeable forecasts of growth from 2017 produced by the Department of Transport which suggest that national aviation forecasts will increase very significantly, and that the Covid-19 pandemic will merely delay this increase in demand by five years. Notwithstanding the questionable nature of the assumptions regarding demand, there is clearly the need for restraint in the light of the climate emergency which is not considered in the consultation document.
- 3.8 With regard to the demand for aviation, CPRE would point to 'flight free' campaigns and evidence that people and organisations are questioning their need to fly more than ever. Sustainable strategies for air travel should align with land use planning strategies in reducing the need to travel and the costs and benefits of flying should be reassessed in the context of the climate emergency.



Levelling-Up

- 3.9 The case for the expansion of Luton Airport will also be significantly impacted by the Government's 'levelling-up agenda' which seeks to rebalance economic development and growth to where it is most needed. The recent Levelling-Up White Paper re-introduces many elements of regional policy which have not been promoted for many years.
- 3.10 The Draft Need Case makes much of the importance of the proposed Ox Cam Arc. In particular how this, Government backed growth strategy, will result in an increase in usage of the airport and how the airport expansion will play an important role in achieving the Arc's growth objectives. However recent reports are seriously questioning whether the investment in this strategy is now a priority for Government under the new Levelling Up Agenda. It was not mentioned at all in the recent White Paper. The reliance the Draft Need Case places on this initiative is therefore ill founded.
- 3.11 Future growth should not be seen as inevitable, and the demand forecasts underpinning this proposal will be affected by national and international policy, approaches to economic growth which can influence demand as well as local changes to commercial activity. This is particularly relevant when specific developments, such as this proposal, have major environmental impacts which reduce living and working conditions for huge number of people

4. Comments on the proposed benefits of expansion (Benefits of Expansion Q7)

- 4.1 The forecast of 12,100 new jobs as a result of airport expansion is considered highly unreliable. There is no linear relationship between growth and local jobs and employment claims are routinely over-stated by development promoters.
- 4.2 Over the period 2010 to 2018, passengers through Luton Airport 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 was significantly below the previous forecast benefits. When the second runway at Manchester was proposed, the promised 55,000 jobs were subsequently reassessed to be less than 6,000.
- 4.3 A previous statement by Oxford Economics Forecasting (PEIR, Vol 3, Appendix 13-1, para 1.2) in the 2019 consultation, stated 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.



4.4 Also, 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, and 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 and a more sustainable alternative strategy would limit overall numbers travelling, retaining local spend, creating more work and employment without accelerating climate change.

4.5 Luton Council has relied for too long on the Airport as an income generator and employment hub. It needs to spend time, effort and money on looking at how to diversify the local economy and reduce its financial dependence on the success or otherwise of the Airport.

5. Design comments (Proposed design (8.))

No comments

6. Local transport concerns (Getting to the airport Q9)

6.1 Surface access to and from the airport is a key issue in the consideration of the proposals. Luton Airport's public transport links are already inadequate, and the airport has the lowest levels of public transport use (25% of journeys) of any airport in the London region.

6.2 The current shuttle bus 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.

6.3 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'.

6.4 The predicted increase in the use of public transport (from 23% to 45%) and subsequent reduction in the proportion of car-based arrivals and departures is of course welcomed. However, the existing Midlands Mainline already has capacity and congestion issues and the success of Luton DART, already under construction, will depend on its usability, frequency and its fares.

6.5 No evidence has been provided to demonstrate how and why the DART and the other limited coach and bus proposals will achieve the change in public transport usage. There needs to be far greater investment in a wider network of sustainable transport modes if the proposed targets of reducing car borne trips is to be achieved or improved. CPRE advocates, regardless of any expansion plans, a much more ambitious target of road traffic reduction.



- 6.6 40,000 more passengers a day and the proposed additional 7,925 car parking spaces will generate more private car use, congestion and more GHG emissions. The road network will inevitably be inadequate and congested, and this will lead to further pressures for road building around the site and into nearby countryside.

7. Construction and phasing objections (Airport construction Q10-11)

No comments

8. Environmental objections (Environment Q12-13)

- 8.1 There is a wide range of environmental objections to the proposed expansion, and the overarching concerns of the climate emergency have been noted above. In addition, there are significant issues with regard to noise pollution, the impact on the countryside, air quality, and the concept of Green Controlled Growth which is introduced in this consultation. Issues regarding the impact on open space and Wigmore Valley Park are addressed separately below.

Noise pollution

- 8.2 It is inevitable that noise pollution will increase with the proposed expansion and the impacts are underestimated in this consultation. Luton Airport is a site located within a tightly packed series of large towns and cities that are already adversely impacted by noise including Luton, Bedford, Biggleswade and Sandy as well as Hemel Hempstead, Harpenden, St Albans, Stevenage in Hertfordshire. Areas of countryside in Bedfordshire, Hertfordshire, Buckinghamshire and Cambridgeshire already experience a loss of tranquillity on account of the airflight paths. The recent proposed changes to the flight paths and new holding stack for the Airport in Cambridgeshire will also result in aircraft flying over communities that have previously enjoyed relative tranquillity blighting both rural areas, communities and areas currently allocated for housing expansion such as Biggleswade.
- 8.3 The impact of noise from the Airport is therefore already widespread and a 60% increase in flights, will inevitably increase this and spread the damage to health over an even wider area.
- 8.4 The noise modelling/forecasting for the proposals relies on assumptions made about the use of quieter 'next generation' aircraft; a different fleet mix, incorporating larger aircraft, and working with the National Air Traffic Service to reduce holding delays at and near the airport.
- 8.5 However, these are all outside of the control of Luton Rising. Therefore the noise and air quality projections made in the consultation documents are fundamentally flawed and should be revised to include other potential, less optimistic scenarios.



- 8.6 The proposals are also not compatible with the provisions of Luton Local Plan Policy LLP6, which even though it was redrawn to be more favourable to airport growth, 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...

- 8.7 It is accepted that, since 2017, the approved noise contours have been exceeded by Luton Airport and the Council has failed to enforce planning conditions attached to planning consents.

Air quality

- 8.8 As part of this consultation exercise, Luton Rising states that the future use of newer generation aircraft, together with more efficient and electric road vehicles will reduce emissions in the future. Luton Rising’s air quality assessment, like the noise assessment, therefore, places significant reliance on these assumptions. However, as with the noise forecasting mentioned above, the airport authority is not in a position to guarantee that the uptake of the newer generation aircraft and/or the use of more electric vehicles generally will be achieved as forecasted.
- 8.9 The air quality and pollution forecasting for the proposal therefore suffers from the same potential inaccuracies as the noise forecasts and modelling. Traffic to the airport also passes through a number of Air Quality Management Areas including Luton, Hitchin, Dunstable and St Albans and expansion will result in further harm to localised problems of air quality.
- 8.10 It is not possible to conclude that the proposals can be achieved without significant noise and pollution impacts, or that these impacts can be suitable controlled, as is required by national aviation and local planning policy.

Loss of countryside

- 8.11 There will be significant harm to the surrounding countryside in terms of the changing character brought about the expansion plans, as well as the loss of open landscape further incursion into the Green Belt and light pollution. The major expansion of the footprint of development with new buildings, the extended apron for aircraft movement, the new terminal buildings and 7,925 additional parking spaces will encroach on existing greenfield areas to the east of the airport.



- 8.12 A key requirement of national planning policy regarding designated protected areas is the expectation of tranquil enjoyment of Areas of Outstanding Natural Beauty (AONB). The Chilterns AONB, east of Luton, is already significantly affected by aircraft movements and the impacts in terms of noise and visual amenity will increase with these proposals. 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; and that 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.

Green Controlled Growth

- 8.13 Great play is made in the consultation documentation of the introduction of the concept of 'Green Controlled Growth' as a set of guiding principles affecting the proposed expansion. The Applicant promotes this approach as "one of the most far-reaching commitments to minimising environmental impact ever put forward by a UK airport".
- 8.14 The draft Green Controlled Growth Proposals document accompanying the application lists four areas where impacts will be managed specifically as passenger numbers grow. They comprise, aircraft noise, air quality, greenhouse gas emissions and surface access.
- 8.15 It is suggested that limits should be imposed for each of these categories and a 'framework' will be set up to ensure that the limits are not breached, and that growth only takes place within strict environmental limits. An Environmental Scrutiny Group is proposed to oversee Green Controlled Growth to include representatives from local councils, including Luton and technical experts.
- 8.16 We note that the content of the proposals will be provided by the Environmental Statement which is required as a result of Environmental Impact Analysis (EIA) regulations. This is a requirement for all major development proposals and effectively covers the same concerns as those promoted as Green Controlled Growth (GCG).
- 8.17 The Applicant asserts that GCG goes beyond the usual requirements of the EIA process, "providing a level of ongoing assurance and control over the environmental effects of expansion." They also assert that the GCG proposals will be enforceable and remain 'active' beyond the grant of development consent.
- 8.18 We believe that these assertions are misleading in that environmental conditions attached to any consent are always enforceable under existing legislation, and the heavy promotion of this concept is suggesting additional controls which are both unnecessary and unlikely to be implemented robustly. There is constant reference in the consultation documents to the binding nature of the GCG commitments but again this is unlikely to introduce anything beyond what should be normal enforcement of environmental conditions and standards.



- 8.19 A total of only 15 pages (Section 4) out of 53 in the GCG Proposals document is devoted to discussion of the technical content of GCG limits and thresholds. These technical matters will be dealt with most appropriately in the Environmental Statement and supporting information and there is no need for a further, potentially wasteful, layer of institutional arrangements to undertake monitoring functions which are already statutorily required.
- 8.20 Further, the recent enactment of the Environment Act and subsequent related legislation in the future is likely to strengthen the responsibilities of institutions of all kinds with regard to the environmental impacts of their activities. We welcome the stated intentions of the GCG concept, but these should already be part of the EIA process, and we do not believe that the introduction of a further layer of process as suggested is likely to provide any additional benefits to either the Airport or those affected by its activities.

9. Loss of open space (Open space Q14)

- 9.1 Luton Borough Council are proposing to transfer Wigmore Park, to the Airport company so parts of this can be redeveloped.
- 9.2 Wigmore Park as an open space was gifted to local residents in compensation for the loss of green space to residential building. It is a long-established park and nature reserve and has evolved into an integrated and mature habitat, with a developing and varied ecology including thousands of orchids, bees, butterflies and over 60 bird species.
- 9.3 Wigmore Park has achieved County Wildlife Site status, received public recognition and awards and is listed as an Asset of Community Value. It enjoys wide support as a popular and much-loved recreational space for the local community and acts as a noise, pollution and visual buffer between the eastern end of the Airport runway and the residential area less than a mile to the north.
- 9.4 It deserves special treatment as an Asset of Community Value and as a buffer to Airport operations.
- 9.5 The Park is an important element of the commitments made in the Luton Local Plan to mitigate and reduce over time the noise and amenity impacts of the Airport. Notwithstanding concerns relating to the nature of the relationship between Luton Council and Luton Rising which have been raised by others, the proposals to 'replace' the area intended for use by the Airport with additional land are both inadequate and inappropriate. The replacement land does not make up for the loss of a mature, ecologically rich and highly valued landscape. The new area will take years to mature, would no longer be located within easy access of local residents and would not act as the buffer to the airport as originally intended.
- 9.6 We strongly oppose the inclusion of Wigmore Park and destruction of this important and unique green area and habitats.



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10. Comments on compensation (Compensation and Community First Funding Q15-16)

No comments

11. Further comments Q17

- 11.1. CPRE Bedfordshire strongly oppose the proposed expansion of Luton Airport. The growth proposals are ill founded, poorly evidenced and completely ignore the current climate crisis.
- 11.2. Luton Rising should focus on working within its current financial and operational parameters until it can clearly demonstrate growth is justified and can be achieved without further irreparable damage to the environment.