

Luton Airport Expansion Plan Consultation 8th Feb to 4th April 2022.

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 support, Slightly support, Neutral, Slightly oppose, **Strongly oppose, Don't know. Please provide us with the reasons for your response.**

1. No credible business case

- The impact of the Covid-19 pandemic, Brexit and the Climate Crisis has reduced the need and desire for more flights.
 - People are choosing to travel less for pleasure
 - Business travel has declined significantly as businesses have got used to online meetings, saving time and money on unnecessary flights and hotels etc.
 - The UK has become less attractive to European Union economic migrants so there is less demand for flights to and from these destinations

2. Noise.

- Noise was the main issue reported by residents in a survey Kings Walden Parish Council conducted this month to canvas residents' views on the proposed airport expansion plans. Noise was a problem for residents in 2019; expansion would inevitably lead to more noise. Residents have reported:
 - Regularly disrupted sleep
 - Not being able to hear conversations in person or on the phone
 - Difficulties caused by noise when working from home (which is now the norm for many)
 - Noise negatively impacting on their enjoyment of leisure time in their homes, gardens and out walking
 - Noise disturbs wildlife which in turn disturbs residents
- The World Health Organisation (WHO) Environmental Noise Guidelines October 2018 states that, 'Environmental noise is an important public health issue, featuring among the top environmental risks to health. It has negative impacts on human health and well-being.' In the section on aircraft noise, it states, '*For average noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft below 45 dB Lden., as aircraft noise above this level is associated with adverse health effects. Strong For night noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft during night time below 40 dB Lnight., as night-time aircraft noise above this level is associated with adverse effects on sleep.*' The NHS reports that, *regular poor sleep puts you at risk of serious medical conditions, including obesity, coronary heart disease and diabetes – and it shortens your life expectancy (<https://www.nhs.uk/live-well/sleep-and-tiredness/why-lack-of-sleep-is-bad-for-your-health/>)*
- In the first lockdown the lack of noise from ground operations was noticeable. A second, closer terminal will bring even more constant noise closer to residents
- Noise monitoring carried out in Breachwood Green in 2019 showed that even the newer, supposedly quieter, Neo aircraft were not in fact quieter over Breachwood Green. Also, measuring average noise hides the noisy spikes that can be more disruptive.
- Double glazing, offered to those who live within particular noise contours, will not help on a hot summer's day when people will want to have their windows open or when wanting to spend time outside in the garden / countryside.
- The noise from aircrafts isn't the only issue, they cause vibrations within houses directly under the flight path.

- The airport cannot control the modernisation of fleets and noise levels will increase during the coming years not decrease if the number of flights increase by the 40% envisaged by the plan.
- Your proposals discuss fixed noise monitors being in place in certain villages after expansion. We feel a fixed noise monitor needs to be in place in Breachwood Green NOW, for Luton Rising to fully understand the impact of noise pollution that the village already experiences.

3. Environmental Concerns.

- Kerosene planes are bad for the environment. No one has yet come up with a greener alternative that is commercially viable.
- Residents complain about the smell of aviation fuel, and the air quality in the areas surrounding the airport. This will only worsen with expansion.
- Global warming is a critical issue facing the world; emissions must be decreased, not increased by more flights.
- Any increase in passenger numbers is in conflict with the Government's commitment to reach net Zero by 2050.
- Building on Wigmore Valley Park is an unnecessary destruction of established and mature wildlife habitats. It takes many years for an area like that to establish, and at a time where environmental concerns are high on everyone's minds, this isn't an appropriate decision. A 10% biodiversity net gain will not fully compensate for the irretrievable damage which will be caused to an area of outstanding natural beauty.
- The excavation required for the expansion will remove most of Wigmore Valley Park and the landfill site on which the park was built some 50 years ago. No one fully knows what will be dug up, but with the prevailing westerly wind, communities to the east of the site will be exposed to the noise of the construction vehicles, dust and possibly even contaminated material.
- The proposal to use farmland for the expansion is worrying. Once farmland is taken out of agriculture, it never comes back. There is a global food shortage which will get significantly worse because of the crisis in Ukraine. Moreover, the cost of importing food, further impacts on the environment and increases global warming. Wildlife living in and around the farmland will move on. Villages, and village life, in our parish will be negatively affected.
- Losing Green Belt Land for the expansion goes against Green Belt Policy. It is not as simple as just moving a green space.
- It is unclear why existing brown field sites around the airport aren't being utilised before destroying an established parkland.

4. Affordability

Luton Borough Council has a duty of care to its residents and needs to diversify its income-generating and local employment strategy, with a policy of promoting and supporting green industry. It is making plans to spend money that it does not have on an airport expansion development that isn't necessary.

5. Traffic and road system.

- A big concern of our residents is traffic congestion. Junction 10 of the M1 and the roads around the airport were already congested in 2019 at almost 19 million passengers.
- Any expansion will cause more congestion on roads that already cannot cope with the amount of traffic. It is hard to see a benefit to local residents who will struggle to get to where they need to every day with further congestion from an airport expansion.
- Many of the roads close to the airport, that passengers use to access Luton Airport, are single track country lanes that are not designed for the levels of traffic that they already get. The expansion

proposal doesn't address the increased impact any expansion will have on these country lanes, and the villages that they run through.

- The expansion plans say that 45% of passengers will use public transport. Even if this is true, that still leaves more than half the airport's passengers travelling by road. In any case, whilst North and South rail routes are available, these are not an option for those travelling to the airport from the East and West.
- Some passengers already park their cars in Breachwood Green free of charge when they fly from Luton. This causes a nuisance for residents and visitors where road parking is the only option for some who do not have a drive. There will no doubt be an increase in the occurrence.
- The area around the airport is mostly residential, and includes several schools and places of work. The increase in traffic and congestion during the expansion, and after, would be huge. This would also cause extra noise and air pollution.
- There have not been any traffic surveys carried out from Kings Walden Parish into Luton, this needs to be done to fully understand the impact on our villages.
- Three road junctions in Hitchin are identified for minor improvements in the proposal: A602 Park Way / Upper Tilehouse Street roundabout, A 602 Park Way / Stevenage Road roundabout and A505 Offley Road/ Pirton Road roundabout, all of which fail to cope with the existing levels of traffic at peak times. There is only space for very limited improvements to these roundabouts which are unlikely to reduce the adverse impact of increased traffic through Hitchin as a result of airport expansion.

6. Lack of trust in the airport.

- Residents do not trust the airport. It has consistently broken agreed noise limits and agreed phased growth. In particular, the lack of restraint regarding night flights is a cause for concern.
- There is a clear conflict of interest with Luton Rising being owned by a sole shareholder Luton Borough Council who is the planning authority
- Luton Borough Council and Luton Airport are already in debt, and further loans are being negotiated. It is hard to see how this is a solid business plan to go forward.
- The proposals include some lovely pictures of the airport development, but the surrounding area shown is not correct and is therefore misleading. There are miles of hedgerows and wildlife areas shown that are not on land owned by Luton Rising. These do not exist currently, and liaison with the landowners has not happened. It is unlikely that landowners would plant hedging for Luton Airport when there is no benefit to them and the cost of maintaining this planting will also fall to them.

7. Light Pollution

- The effect of the lights at Luton Airport should not be underestimated. It affects people sleep, and that of the wildlife.
- These bright lights interfere with the viewing of sunsets and the stars in the night sky already. A second terminal closer to the parish would increase the light pollution in the area.
- Light pollution from the airport is already an issue in our parish, there needs to be more done already to mitigate these issues before making the issue worse.
- Luton Airport's 2021 Environmental Policy states that the airport will 'actively participate where possible in local, national or international activities aimed at mitigating the environmental impact of airports.'. This has not happened in regards to the airport at the size it currently it, moves should be made to mitigate the current issues before expanding the airport and exacerbating the issues further.

Why grow?

6) Do you have any comments on our Draft Need Case which sets out the reasons for our proposal to expand the airport?

- The Draft Need Case is based on out-of-date information which does not take into account the negative impact on air travel of Covid 19 and Brexit
- The Environment: airport expansion does not make any sense when the world is facing a climate crisis and Government has committed to Net Zero by 2050.
- More Jobs and Levelling Up: Luton Borough Council should look at diversifying the industries in the area, particularly green, sustainable businesses and technologies.
- Funding issues: The airport has borrowed hundreds of millions of pounds and already has to pay a substantial amount to service the interest on its existing debts.
- Location: the location of the airport, on a hill, means expansion requires expensive and extensive earth moving.

Benefits of expansion

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?

Listen to local residents who know and understand the area. Put finance into developing jobs and industries outside of the airport. Maximise the potential of the airport as it is now, and the current terminal, to create new employment.

Our proposed design for the airport

8) We have made changes to our design since the 2019 statutory consultation. Do you have any comments on our design proposals for the scheme?

Kings Walden Parish Council and the overwhelming majority of its residents strongly oppose expansion to 32 million passengers, the disposal of Wigmore Valley Park and the loss of valuable farmland in North Hertfordshire.

Getting to the airport

9) Do you have any comments on our proposed Getting to and from the airport – emerging transport strategy? Do you have any suggestions for how we can maximise access to the airport by public/sustainable transport modes?

At present only 14% of passengers travel to the airport by public transport. Without an East West rail link only passengers travelling North South are able to travel by rail. Further expansion will therefore result in additional traffic into an already congested local road network, which will also increase pollutants and decrease air quality.

As mentioned before, many of the roads in North Hertfordshire that passengers will use to access Luton Airport are single track country lanes which will not be able to cope with the increase in traffic that the airport expansion will provide.

Building our airport

10) 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 Terminal 2 and associated facilities. Do you have any comments on our proposals for constructing the scheme?

The existing expansion permission, granted in 2013, still has seven years to run and has not yet delivered on its promised noise mitigations; any further expansion is not warranted at this time.

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?

The best way of minimising the impact of construction is to not expand the airport.

The environment

12) Do you have any comments on the environmental effects of expansion and how we propose to manage and mitigate them?

Airport expansion would have a significant detrimental effect on the environment. Airlines choose their own fleet and even the newer, more fuel-efficient planes have been found to be just as noisy as older versions.

The Noise and Vibration chapter states that by 2043 there would be 70% more flights at night (between 11pm and 7am) and 50% more during the day. This would have a significant, negative impact on the health and quality of life of Kings Walden Parish residents. Luton Rising plans to significantly increase the number of flights scheduled between 6:00 and 07:00 and between 23:00 and 23:30. This is a substantial increase in night flights (11pm-7am).

The proposed double-glazing schemes are open only to residents who live in specific noise contours and even if they were appropriate (they may not be allowed for Grade II Listed buildings, of which there are quite a few). This would not help on a hot summer night when it is more comfortable to sleep with the windows open. Nor would double glazing help when residents wish to make use of their gardens and the local countryside.

An expanded airport means more light pollution for residents, impacting on quality of life and sleep. The proposed screening plans rely on the co-operation of other land owners for whom the benefit is questionable. Also, any planted screening takes time to grow and will require expensive management.

Taking over Wigmore Valley Park will destroy established diverse plants and wildlife. Moving the park into North Hertfordshire and making it 10% bigger, planting wildflower meadows etc does not offset this. Habitats take time to establish, and the detrimental effect on wildlife cannot be undervalued. The wildlife will not simply relocate to the new park which in any case will take time to build and mature enough to accommodate it.

13) Do you have any comments on our Green Controlled Growth approach?

Your documents state that GCG will introduce binding limits for the airport's noise, carbon, air quality and surface access impacts, and that crucially, these environmental limits are not airy aspirations, but would be legally binding, and independently monitored. However, the airport has consistently ignored legal limits in

the past. Why then should we trust that GCG will do what it says when this has been promised again and again, and again and again, legally binding limits have been ignored and without consequences.

Open space

14) Do you have any comments on our open space and landscaping proposals? Is there anything else you would like us to incorporate?

Relocating a Luton park, that is there to serve the Luton residents, into land in North Herfordshire takes the park further away from the people it is for, meaning most, if not all of them, will have to drive to drive to reach the park. It will involve the destruction of mature vegetation and wildlife habitats. Where will the wildlife go? They will not simply relocate to the new park which in any case will take time to build and for the vegetation to mature.

Destroying valuable agricultural land in order to relocate the park does mean the reduction and destruction of open space. Also, the agricultural land that the new park will be built on is not being relocated and this is a huge loss to the area and let us not forget that a loss in agricultural land will also affect employment in farming. Taking land out of agriculture does not make sense either, given the war in Ukraine which produces 40% of Europe's grain.

Compensation and Community First Funding

15) Do you have any comments on our proposed compensation policies and measures?

Noise insulation is not appropriate to all properties within the parameters of the specified noise contours. Double-glazing is only effective when windows are closed, which they will not be on a hot summer day or night. On a hot summer night, residents' sleep will be disturbed by the noise (windows open) or by the heat (windows closed). It also does not help when residents wish to be outside.

Any land or property acquisition scheme, however generous, is no compensation for the loss of a person's or family's home and community. People have chosen to live in Kings Walden Parish, many choosing to live there despite their being an airport close by. They didn't choose to live there with it being as close as the proposals show.

The compensation scheme on offer should be extended to all of the villages in Kings Walden Parish affected, not just the certain few that Luton Rising assumes are affected by noise etc.

We have residents who wish to take out equity release on their properties and have been turned down due to their property's close proximity to Luton Airport. The airport being closer will only exacerbate issues like this.

16) Do you have any comments about our proposals for the Community First scheme?

It is hard to see how the proposals for the expansion are putting the residents of Kings Walden Parish first.

Further comments

17) Do you have any other comments about our proposals to expand London Luton Airport?

Kings Walden Parish Council urge you to listen to residents' comments, and consider the negative impact that an expansion will have on the land surrounding the airport and its residents.