

LONDON LUTON AIRPORT MASTER PLAN –PROJECT 2030

COMMENTS OF NORTH HERTFORDSHIRE DISTRICT COUNCIL

Introduction

In commenting on the Luton Airport Master Plan, this Council is at all times concerned primarily with the impact which any proposal will have on the people and environment of North Hertfordshire. Safeguarding and promoting the quality of life of people in North Hertfordshire, is the main concern of this Council.

As such, North Hertfordshire District Council has serious concerns about the proposals contained in the Luton Airport Master Plan, particularly the actual and potential impacts on people in North Hertfordshire. The Council objects in principle to the proposed increased scale of operations at Luton Airport, which will see passenger numbers increase by over three times, and double in physical size.

It is accepted that the current Government policy is to increase the capacity of Luton Airport to around 30mppa by 2030, however the Council does not agree with this policy. The Council are objecting to the Option put forward in this document, because of the impacts it will have on residents of North Hertfordshire. However, the Council will also comment on matters dealing with impacts and mitigation, on the premise that despite this Council's objections, these proposals may gain approval and be implemented in the future.

Air Transport White Paper (ATWP)

The ATWP says that the Government 'supports the growth of Luton up to the maximum use of a single full-length runway based broadly on the current alignment, on condition that the overall environmental impacts of such development will be carefully controlled and adequate mitigation provided' (11.89)

Throughout the section of the ATWP which deals with Luton, it talks about a 'replacement' runway. This suggests that the Government expected the existing short runway to be 'substituted' by another runway. However, the Master Plan makes clear that this will not be the case.

The Council are of the opinion that Option D is not a replacement runway, as set out in the ATWP, but in effect a second runway. Paragraph 11.92 of the ATWP states that 'On balance, we do not support a second runway at Luton'. The Master Plan admits that the current runway will probably be used in the future for some form of aircraft movements. Therefore, the 3000m runway is in no sense replacing the 2,160m runway, it is in addition to it. The Council would like all references to 'replacement' runway removed from the document.

Forecasts

The document contains figures on demand forecasts for the airport at various dates up to 2030. Table 7.2 gives key operational thresholds and capacity constraints. It states that the maximum capacity of the airport will be reached by 2020 and will be 30mppa. It is not clear whether this includes any use of the existing runway in addition to the full use of the new runway. There is also no data on the capacity of a fully operational two-runway airport, which would be a possibility with this Option, if the demand were there.

Preferred Option/Optioneering

Despite being told that more details would be included in the Master Plan on the cost of each option, this has not happened. Unless some information is provided on costs, there will always be the suspicion that Option D was chosen as it was the cheapest one. (para 6.4)

According to paragraph 7.27, the current runway will be used for emergencies and maintenance. It also states that LLAOL wish to continually review the opportunity (of using the current runway), and maintain, 'limited continued use of the existing runway for aircraft movements, beyond 2015, ...'. This is particularly worrying as it shows that the airport will consider using both runways to their full potential in the future.

The Council is concerned that the idea has been floated in this document that Luton Airport could at some point in the future operate as a two-runway airport, but the implications of this have not been considered nor discussed in the Master Plan. The Master Plan is supposed to look forward to 2030, and so it should contain more detail on what the airport is proposing post-2015, with regard to use of the current runway. The fact that the airport will consider using both runways in the future, will cause more uncertainty and concern amongst local communities and should be explained more fully.

Should the full-length runway be constructed, the Council objects to the continued use of the current runway for any purposes other than emergencies or essential maintenance.

Land Take/Visual impact

The proposal in the Master Plan will involve the loss of 330 hectares of Green Belt land, for development within the boundary of the airport. This is the largest land take of all the options considered, and six times as much land as would have been lost under Option A to extend the existing runway. Of the 330 hectares of land, 177 is within North Hertfordshire. Including the 'environmental buffer', there will be approximately 277 hectares of Green Belt land in North Hertfordshire required for this proposal.

The physical size of the airport will increase greatly, approximately doubling the site area. Whilst the proposal is to try and minimise the impact of the new terminal, it will still be a large new building in the middle of what is now Green Belt land. It is not clear from the Core Strategy and the Sustainability Appraisal, if and how different factors such as land take were weighted when the optioneering was being done.

Transport

Increased Traffic

One of the major concerns which the Council has over increasing passenger numbers by approximately four times, is the ability of the transport infrastructure to cope. It is even more concerning because of the fact the airport operators have no control of the vast majority of transport infrastructure which will be required. Therefore, they can only hope that the infrastructure is provided to deal with the increase in passenger numbers.

Whilst the Council does not support the scale of development proposed in the Master Plan, if it should happen then the proper transport infrastructure must be put in place when it is required, and preferably before it is required. The airport operators will be required to ensure that sufficient resources are made available to meet travel

demand generated at the time it is needed, especially to support mode share targets that seek higher levels of passenger transport, walking and cycling than are currently being achieved. It will not be acceptable to rely on infrastructure managers and service providers to meet the future surface access needs of the airport.

Paragraph 2.13 of the Airport Surface Access Strategy (ASAS) mentions the strategic road network, but contains no discussion of the existing constraints on the network. The number of extra passengers using the airport between now and the 2030 could be in the region of 22 million. This is an extra 60,273 passengers per day. In 2004, 61% of passengers used private cars (excluding hire cars and taxis) as their main mode of transport to the airport. Based on these figures, the number of additional people arriving each day by car would be 36,766 (61% of 60,273) in 2030. The overall passenger numbers will include some transferring passengers, though this will be very small, as Luton is not a hub airport.

According to the ASAS (2.13), 14% of the airport traffic comes along the A505 (east). Therefore, the number of extra people potentially using Luton Airport per day who come by car and use the A505 (east) could be 5,147 (14% of 36,766). The latest count of vehicles on the A505, just to the west of Hitchin was 24,848 over a weekday average. Clearly, not every car contains only one individual, with the average occupancy rate for cars in Hertfordshire is 1.25.

The vast majority of the traffic on the A505 will have to come through Hitchin, or on rural roads not intended for the purpose of accessing the Airport. Hitchin currently experiences congestion at peak times. Should Luton Airport expand as is proposed, as well as the potential construction of a Luton Northern by-pass which may join the A505 within North Herts, the result will be a significant increase in congestion in and around Hitchin.

The Council would have liked to have seen a Transport Assessment (TA) done in support of the Master Plan. An overarching and robust TA could have been produced to support the Masterplan to which detail could have been added for individual phases as they come forward. As it has not been done, the Council wish to ensure that any future Transport Assessment covers the impact which these proposals will have on the A505 east and Hitchin.

Paragraph 1.6 of the ASAS states that a Scoping Report will be carried out prior to the Transport Assessment. North Hertfordshire District Council would wish to be involved in this Study. Paragraph 3.19, bullet 2 talks about costs and benefits and options for improving connections to the east of Luton. This should include constrained junctions in and around Hitchin.

Another concern which the Council has relates to traffic on A1(M). If the development at West of Stevenage is built, this would create more congestion on the A1(M) around Stevenage. As congestion worsens, there may be more pressure for those travelling to the airport up the A1(M), to come off at Junction 6 and travel up the B656 and indeed other less suitable rural roads.

Figure 3.1 in the ASAS shows Proposed Surface Access Improvements. The purple dotted lines show 'Possible Alternative Routes'. It is unclear what these routes from the A6 to the A505 relate to, especially the lines shown to the south of the A505. One alternative north of the A505 appears to be similar to the current safeguarded route whereas the other has not status. The Council is concerned that these routes are put in the public domain without a robust appraisal of the transport and environmental impacts as well as a clear view on how they will be delivered.

With regard to the Luton Northern by-pass, paragraph 2.45 of the ASAS says that it is under consideration for inclusion in the LTP, and in paragraph 3.19, bullet 4 it is a 'proposal' on the Bedfordshire County Council. The Luton Northern by-pass is only at the feasibility stage, and no case has yet been made for the need for it, or what its purpose would be, in the feasibility work so far. Therefore, it is probably incorrect to say that it is a proposal, or under consideration for inclusion in the LTP.

Modal Split

The Council is keen to see as many passengers and employees as possible arriving and departing Luton Airport by public transport. This is for reasons of limiting Co2 emissions as well as having less car traffic on the roads in North Hertfordshire. Paragraph 3.22 of the ASAS state that the challenging targets of 35% public transport use will be retained.

The other three main London Airports have set targets of 40% of passengers using public transport, and Stansted have almost met that target. Therefore, it is debatable whether the Luton target of 35% is challenging enough, and we would suggest that this is increased to 40% as a minimum with a view to increasing this via effective operation of a Travel Plan. A date for achieving all targets should also be set.

Paragraph 3.19, bullet 16 talks about working with bus and coach operators to improve east-west public transport. The Council supports this, but would like it to go further, and for investigations to be made into using Hitchin station as a railhead for passengers from Cambridge, Peterborough and locations between them and London. As stated above, the Council is concerned that operators will be relied on to meet demand without any financial assistance from the Airport Operator.

The Council agree with the comment in paragraph 2.21 of the ASAS that demand management will be required to promote more people to use public transport, and consideration should be given to restraining and managing car parking provision to promote alternative modes. Paragraphs 2.34 and 2.35 should give some more detail about how the airport expects to increase the modal share of rail and bus/coach.

As part of the Transport Assessment process, a Travel Plan for employees and passengers should be developed. Such a Plan should be considered the implementation part of the Transport Assessment and should run alongside any infrastructure improvements required to maximise the potential for passenger transport, walking, cycling and car sharing.

Severance of roads and public rights of way

The proposal to expand the area of the airport will have serious implications for the surrounding road network. A number of roads around the airport will be severed by the new boundary. This will have significant implications for accessibility in the area. Paragraph 8.29 states that these roads and affected public rights of way will be diverted, but does not say how. Without further information, the Council is not convinced that the movement of people in the vicinity of the airport is not going to be significantly inconvenience by the blocking of a number of local roads.

Pressure for off-site parking

Table 7.1 in the document states that there will be a requirement for approximately 14,000 extra parking spaces. The aim of the airport is to accommodate as much of this as possible within the boundary of the airport, but it is acknowledged that this may not be possible. The Council is concerned that there may be pressure for car parking within North Hertfordshire, if it cannot be accommodated within the airport, or

the Luton conurbation. This would likely have adverse impacts on the rural environment.

Air Noise

The impact of noise on residents of North Hertfordshire is one of the most important issues for the Council. The Master Plan states that the number of people within the 57dB(A) noise contour will reduce between 2004 and 2030, from 3,773 to 2,790. However, this is mainly due to the fact that residents in south Luton will no longer be within the noise contour. This is not the case to the east of the airport in North Hertfordshire.

In 2030, the 57 dB(A) contour will stretch right across the southern rural part of North Hertfordshire, and reach central Stevenage. It will encompass a number of small communities in North Hertfordshire, including some who have not been exposed to these levels of noise before, e.g. Whitwell.

Night noise is something which is particularly concerning for people who live around the airport. Therefore, the increase in night noise which these proposals will lead to, is worrying. The number of people affected by night noise within the 48 dB(A) contour will increase from 6,731 in 2004 to 16,010 in 2030. Whilst some of this increase will be within Stevenage, some will be in North Hertfordshire, west of St Paul's Walden and to the south in places like Peter's Green and Whitwell.

It has been estimated by London Luton Airport Consultative Committee's noise consultant, that there will be an increase in night noise of 13 dB L Aeq T in Langley, 12 in Peter's Green and 13 in Whitwell.

Ground Noise

The creation of noise by an airport is not entirely associated with aircraft in flight but also from ground operations. This aspect has been mentioned within the draft Master Plan documents in as far as the preferred option D, is stated as being further away from housing and therefore noise levels will be naturally lower. All things being equal, this is likely to be true. However, the greater distance between the new runway and the various terminal buildings will result in considerable aircraft taxiing and this is likely to be a significant source of noise. The comment that aircraft stands are to be designed to reduce noise whilst aircraft are static is welcome but is unlikely to have an important part to play in general noise control given the above comments relating to taxiing.

Sound Insulation Scheme

Any scheme to provide respite to residents should be welcomed, particularly if it is provided on a voluntary basis. However, it is important to note that the scheme suggested by LLA is limited in the following respects:

- Protection is only afforded to dwellings – obviously there is no protection for gardens or other amenity areas;
- The scheme relates to grant aid for windows. No comment is made regarding the real objective – the management of the internal living space as regards noise levels and ventilation;
- Windows may not be the only acoustic weak spot in a dwelling (e.g. the roof);

- The trigger for compensation appears to be based entirely on modelled noise levels and not those actually encountered by the community;
- The proposed 63 dB(A) threshold needs to be based on accepted published guidance and be consistently applied with regard to best practice within the industry;
- The proposed threshold is based entirely on daytime noise levels – a second trigger relating to night-time noise may be a reasonable addition;
- A sound insulation scheme relating to future noise levels has been deferred until later in the development process..

Air Quality

The proposed expansion of LLA, should it proceed, is likely to have a significant impact on local air quality due to direct aircraft emissions and also from the greater use of road transport. Whilst the documentation published by LLA acknowledges the potential environmental harm in this respect no prediction has been made on the scale of this impact or whether it is capable of being adequately controlled. Indeed, a full assessment has been deferred until Phase 1 of the development process.

Water Resources and Flooding

In 2001 the village of Kimpton suffered serious flooding - there were unconfirmed suggestions at the time that the flooding could have been attributable to some extent from run off from the airport. The large increase in hard surfacing will have some impact of the drainage in the area, and could lead to flooding problems elsewhere if not properly dealt with.

The Environment Agency is the prime regulator as regards water resources and therefore it is inappropriate to comment other than to state that a full hydrological survey has yet to be completed. LLA is situated over an unconfined chalk aquifer that is used for water abstraction. It is therefore vitally important that this scarce resource is protected from contamination.

Employment and Economy

This Council can appreciate the objective of Luton Borough and South Beds District Councils to regenerate the urban area through increasing employment opportunities for its population. However, the Council is most concerned with its own communities.

The number of people who work at Luton Airport who come from North Hertfordshire is small compared to other areas such as Luton, South Beds and Mid Beds. The study undertaken by Halcrow on the 'Employment and Housing Implications of an Extended or Replacement Runway At Luton Airport' (2004), put the figure at 376 (4.8%) in 2000.

Hitchin and Letchworth have higher unemployment than the District average. However, it is not so high as to mean that some extra jobs at Luton Airport, which may go to residents in the western part of North Hertfordshire, is a major incentive for the District to support significant growth at the airport. More jobs for North Hertfordshire's residents are generally to be welcomed, but not if it comes at the expense of other residents' quality of life.

One of the purported benefits of the airport expansion is the rise in foreign tourists coming to this country via Luton Airport, and spending their money in this country. However, according to the Halcrow study, in 2003 there were 2.5 times as many people leaving the country from British airports, as were coming in from abroad. The balance of payments deficit on overseas travel and tourism was £18.5 billion in 2004. In any case it is unlikely that much of the money spent by foreign tourists will be in North Hertfordshire.

Housing

Increasing the number of jobs at Luton Airport will create an increase in demand for housing in and around the conurbation. Paragraph 8.73 estimates that this could be in the region of 8,000 new dwellings in the core catchment area, which includes North Hertfordshire. North Hertfordshire is already potentially having to accommodate at least 2,600 extra dwellings in its Green Belt to support the growth of Stevenage. The Council cannot support the loss of further areas of Green Belt in the west of the District to support the growth of Luton Airport.

Conclusion

The Council is not claiming that there are no benefits to some North Hertfordshire residents of an expanded Luton Airport. However, in the Council's view, the benefits of this proposal are outweighed by the disbenefits, particularly with regard to traffic and accessibility, noise, loss of land, and visual impact. The Council is also of the view that this proposal is for a second runway, rather than a replacement runway, and is contrary to the government's policy in the Air Transport White Paper. Should Luton become a fully fledged two-runway airport, the disbenefits to North Hertfordshire would become even more serious. Given the scale of development proposed applications for expansion of the airport should treat development in a long term and comprehensive manner, rather than in a piecemeal approach. Applications should be for the whole of the master planning area to properly assess and control the context of development. This is particularly important given the location of the administrative boundaries and the need for this Council to ensure that the appropriate mitigation measures are secured.