

Examination of Modifications MM149 and MM375 in relation to London Luton Airport

REPRESENTATION COMMENTS TO NORTH HERTFORDSHIRE DISTRICT COUNCIL LOCAL PLAN

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THE REPRESENTOR'S ARGUMENT

The draft North Herts District Council (NHDC) Local Plan makes only one or two tiny references to London Luton Airport. Furthermore, in the modifications proposed by the Inspector and incorporated by NHDC, there are two specific modifications that are relevant to Luton Airport. These are:

MM 149 - which states

“London Luton Airport immediately adjoins the District to the west. Development potentially affected by noise from the airport will need to ensure that appropriate mitigation measures are incorporated. Site-specific criteria for relevant allocated sites are set out in the Communities section of this plan”.

And MM 375 – which states

“We will also work with these and other relevant authorities to understand, and holistically plan for, any long-term strategic infrastructure requirements arising from future growth. This will include consideration of any infrastructure that may be required within North Hertfordshire to facilitate the delivery of growth proposed in other authorities’ plans or other long-term aspirations that may come to fruition over the plan period. Any proposals to expand London Luton Airport beyond the limits of its current planning permission would fall within the scope of this commitment”.

In both the draft Local Plan and these modifications there is no specific mention of the major expansion planned for Luton Airport and which will have a significant impact on the planned building of 2,100 homes on Green Belt land to the east of Luton. If ever there was an elephant in the room – this would be it!

The Green Belt area to the east of Luton is very close to the boundary of London-Luton Airport – indeed building homes on Green Belt land further to the south of the area has been ruled out due to its proximity to the airport and air traffic.

Nationally there is an assessed need for more airport capacity and it is well-known that Luton Airport has an important role to play in this. Both nationally and locally therefore it is common knowledge that there are strategic expansion plans for the airport.

In early 2018 master plans were unveiled for a dramatic expansion of Luton Airport on an area closely adjoining the Green Belt land allocated for 2,100 homes by NHDC to meet so-called unmet housing needs from Luton.

These plans include, a second Terminal, which will be capable of increasing capacity at the airport from its current 18 million passengers per year (mppa) up to a projected 32 mppa, new car parks, new dual-carriageway roads and an extra link road, the DART rapid transit system, plus a significant business park – New Century Park.

The plans also include a new engine run-up bay, a sewage works, effluent treatment plant, a fuel farm as well as airport parking that will butt up very close to the Green Belt land in North Hertfordshire and the proposed housing building sites. These developments will be lit by tower lighting.

It goes without saying that such an increase in passenger capacity (some 78%) will mean a significant increase in the number of flights.

Such is the scale of this proposed development that Luton Airport will have to put in an application to the government for a Development Consent Order (DCO) to authorise the expansion. It is expected that the DCO application will be submitted to the Planning Inspectorate in mid-2020. The final decision will rest with the Secretary of State.

Amazingly, there is no mention of this significant development anywhere in the NHDC Local Plan or in the proposed modifications to the Plan. The various public consultations for the new Terminal Two and other developments have been continuously running for several years and yet the NHDC planners and Local Plan authors have failed to acknowledge even so much as an outline presence of this in their Policies, Examination Documents and Modifications. NHDC supposedly participated during the Luton Local Plan examination, and yet, still there is no mention of it in the NHDC Local Plan.

At the very least, the supposed delivery of 2,100 homes in this area simultaneously with the delivery of the major infrastructure at Luton Airport, just a field or so away, is going to be extremely challenging, let alone the impact on local residents in the villages around Cockernhoe and in the Wigmore area of Luton from such a massive and long-term concentration of noisy construction work. To not have any mention or examination of a development of this magnitude in the Local Plan or its modifications so close to the proposed housing development is alarming.

It can also be argued that building so many new homes close to the expanding airport, with its planned 78% capacity increase in the same timescale as the Local Plan period, will bring associated long-term aircraft noise problems. Apart from these proposed homes in North Hertfordshire being much closer to the runway movements than anything else currently in the Cockernhoe area, they also will be much closer to the proposed new Terminal 2 and with it the associated start-up, taxiing and shut-down noise from aircraft. If ever there was an issue that could cause long-term problems to NHDC from noise complaints and possible litigation, this would be it.

Interestingly, the airport expansion plans also entail eating into the Wigmore Valley Park area, but to compensate for this the airport authorities state that a bigger area of open space will be created to the east. The draft plans for this open space seem to indicate that the land allocated is actually in the NHDC Green Belt and so the question arises have the owners of this parcel of land sold it to Luton Airport?

In the adopted Luton Local Plan 2011-2031 it is stated that the New Century Park development will accommodate 7,000 people per day to enter and leave this industrial

site. Some of these people inevitably will travel by car and exit via the small local Luton road network (already busy), and some, undoubtedly, will further travel on via the roads through the proposed new housing development.

This is in addition to the increase in passengers using the airport. Whilst it is acknowledged that efforts are being made for passengers to use public transport wherever possible (e.g. the DART system), there is no doubt that a higher than current number of people will continue to use their cars to drop off passengers (evidenced by the inclusion in the expansion plans of a new drop-off zone for the new Terminal) and so there will be added pressure on the local road networks both in Luton itself and the adjoining areas.

NHDC has already stated that it does not foresee the traffic from its proposed housing development east of Luton having '*a significant adverse impact on the wider highway networks of Luton and Hertfordshire*'.

This view is not shared by Luton Borough Council, which states in its adopted Local Plan that the large East of Luton housing development '*will affect the local road network and there are likely to be effects in terms of increased traffic congestion and associated pollution*'. It also states in relation to the expansion of Luton Airport that this '*will create significant extra traffic to the airport, including an east-west direction through North Hertfordshire*'.

Given that NHDC does not seem to recognise that a nationally important strategic air transport development is about to take place on its own doorstep – namely the expansion of Luton Airport – at much the same time as the planned building of homes in the nearby Green Belt, and is in denial about the volume of traffic that probably will arise, it is hardly surprising that it still believes that its projected housing development on Green Belt land is going to take place in some form of splendid isolation.

CONCLUSIONS

- We contend that these modifications and indeed the draft NHDC Local Plan represent a failure of the Duty to Co-operate. The Duty to Co-operate relates to the preparation of the Plan which means that cross-border issues should be examined **before** the submission of the Local Plan.
- As the NHDC Local Plan makes no mention at all of the massive expansion of Luton Airport, which has direct implications for the proposed housing development east of Luton, as well as the residents already living in this North Herts area, it is difficult to see how the NHDC Local Plan has examined this major Luton Airport development issue. There is no evidence to prove that such examination has taken place before the submission of the Local Plan; there has been no scrutiny of it during the Examinations, and finally, there is no mention of it in these modifications.
- The disconnect between the statements from NHDC and Luton Borough Council as to the impact of traffic flows arising from the proposed new housing, the New Century Business Park and the expanded airport is worrying.
- It is simply inadequate to rely on the bland statement contained in MM375 – which says “**We will also work with these and other relevant authorities to understand, and holistically plan for, any long-term strategic infrastructure requirements arising from future growth**”. This utterly ignores the fact that an infrastructure project of national

significance is currently planned to take place right next door to the proposed east of Luton housing development and in much the same timescale.

- We further contend, therefore, that this aspect of the NHDC Local Plan should be deemed as Unsound and dismissed.
- Finally, it is difficult to conclude anything other than that NHDC is deliberately evading and ignoring the future wellbeing of its constituents and their environs when no proposals, questions or actions whatsoever are raised with regard to the Luton Airport development. At best this lack of comment/reaction – let alone practical objections - strikes one as surprising and alarming; at worst, one wonders whether the 'silence' is deliberate. Either way, NHDC is absolutely not representing or working towards ameliorating, in any way, the interests of its electors and residents in relation to the major Luton Airport development plan.