

Responses to representations

Following the public consultation, representations were received from

2 Town Councils,
16 Parish Councils,
1 Civic Society
2 Associations of Local Councils
517 members of the public or local interest groups.

Many of the public representations comprised of the submission of variations of a similar email, which was then forwarded from individuals.

The key issues raised fall into categories. These have been addressed in the paragraphs below. Where representations form the basis of “papers” or detailed responses, these have been referred to under the individual category.

Environmental Statement

Comments were received suggesting that either no ES had been submitted, or that it was deficient and did not take account of the wider impacts of the airport.

It is confirmed that the ES was submitted with the application and published on the planning webpage for inspection.

The impacts are addressed in the main body of the report.

Nationally Significant Infrastructure Project (NSIP)

A number of representations referred to the appropriateness of LBC to be the determining authority.

In addition, some of the suggestions were that the application should be determined through the NSIP process because of the relationship between the Council and the airport. This in itself is not a reason for determination through this procedure.

The main report sets out the process of appointing a consultant to review the existing and future capacity.

General

As a general note, it should be noted that the applicant is applying for works which seek to increase the throughput of the airport to 18mppa. It does not expect to reach this figure until towards the end of a period running to 2028.

To achieve that growth, the airport operator not only will need to make some physical alterations (as outlined in the application), but there is also the commercial growth of the airport which relies on the economy, the demand for air travel and the attractiveness of Luton as a destination.

Therefore, where highway works are proposed, these are likely to be implemented prior to an urgent need, fleet mixes of aircraft may well have improved technology and other factors may have changed. These proposals will not have the immediate impact of 18mppa.

Noise Levels

Comments are made in respect of the noise impact on local communities. In particular local interest groups such as LADACAN submitted detailed comments.

A consultant was appointed to review the measures proposed in terms of noise impact and advise the Council on appropriate conditions and controls within the S106 legal agreement. This is covered in the main report.

There have been references to the impact on community buildings and schools arising from noise. Previous compensation schemes have only related to residential properties. A proposal relating to community uses has been included within the draft S106 legal agreement submitted with the application.

Night Flights

Many communities are concerned about the impact of noise and disturbance associated with night flights and cited research into the impact on health from a disturbed night's sleep. It is recognised that to impact is not only linked to the noise of aircraft, but the number of incidents of disturbance.

Further research is being carried out by ERCD, the Environmental arm of the Civil Aviation Authority as part of the Aviation Policy Framework and controls over night flights at the designated airports. The outcomes of this may influence aviation environmental policy in the future, but currently there would be no grounds to completely ban night flights.

It would be unreasonable for the Council to ban night flights completely, based on the physical works proposed in this application. However, by imposing conditions and setting targets to reduce the number of noisier aircraft and seek the phasing in of newer aircraft which introduce cleaner and quieter engines, controls are proposed which are more stringent than currently in place.

Some of the representations refer to the quota count (QC) proposed in the original submission, leading to an unacceptable level of night noise. Following discussions with the applicant, an amended QC has been agreed. This is referred to in the main text of the report.

A number of the public responses stated:

“I oppose the planning application due to its unreasonable definition of 'night'. In Appendix H Noise Appendix N(3) section 7 it states that noise contours are calculated between 11pm and 7am. By shortening the night period for quota purposes, half of the predicted 14 average night arrivals between 11pm and 1130pm and all of the predicted average morning departures between 6am and 7am would be excluded from the night noise quota.”

The night period has been addressed in the main body of the report and has been the subject of discussions with the applicant. Conditions have been imposed that seek to provide greater control over the night period.

Flight paths/airspace

Some of the Councils represent areas that are overflowed by aircraft from more than one airport, in one case it is quoted that the parish is overflowed by aircraft from Heathrow, Stansted, London City and Luton. There are therefore concerns that this proposal would have a further impact on noise and disturbance to the residents.

In addition representations from groups with an interest in the protection of the Chilterns Area of Outstanding Natural Beauty have been received, raising concerns about the loss of tranquillity.

Concerns have been raised about the potential changes to flight paths. This is not part of this application. A previous review (TC North) by National Traffic Services was abandoned and a new review will be carried out in the future (LAMP). At this stage only airspace around Gatwick is being reviewed.

This is a separate process which will have its own public consultation exercise in due course and is out of the control of the airport operator.

One recent consultation carried out by LLAOL, known as RNAV1, has recently closed and a series of workshops will be held shortly to feedback the outcomes to stakeholders.

This consultation is not related to this application and where representations from members of the public related to this, these were forwarded to LLAOL.

BMKALC have proposed a number of alterations to the flight paths and noise preferential routes (NPRs). These have been passed to the applicant for information, but as stated above, any future review will be carried out by NATS and not part of this application.

Designation of LLA

One representation considered that LLA should be re-categorised as a 'designated airport' and therefore fall under the same regulatory authority for noise abatement as the other London airports. This is not within the control of the Local Planning Authority.

Air quality/pollution

Concerns regarding air pollution are a worldwide concern and there are EU requirements to monitor and manage air quality.

A monitoring system already is in place, within the airport boundary. In addition, local authorities are required to monitor and report on air quality within the district. Where air quality levels are identified as decreasing below certain limits, there are requirements under separate legislation to seek improvements to air quality. These requirements are reported through DEFRA.

A further indicator of poor air quality can be seen through the health monitoring of the population.

The Government is encouraging the aviation industry to improve technology to provide engines which show reductions in noise and emissions.

Whilst air quality at LLA will continue to be monitored, the industry is progressing with technology to improve with the influence of the Governments of many countries.

Transport Infrastructure

A number of parishes and residents have raised concerns about the increase in traffic passing through villages, arising from the growth of the airport. One respondent has submitted a number of “papers” on highway implications and the wider implications associated with development on the strategic highway network.

A Traffic Impact Assessment has been submitted with the application and separate assessments have been carried out by the Highways Agency, Hertfordshire County Council, Central Bedfordshire Council and Luton Borough Council, in discussion with URS, acting for the applicant.

A condition has been imposed by the Highways Agency, restricting throughput until works to improve M1 J10a have been completed.

As noted in the main body of the report, whilst an impact on localised junctions around the airport will require some mitigation works, the further away from the airport, the impact is minimised, due to traffic dispersing.

Specific roads have been mentioned but these are generally considered to be outside the area of impact.

Comments have been made about no direct rail link to the airport, but with recent improvements to Parkway Station, there is now a greater choice of bus links from the station to the airport terminal.

The capacity of the rail network has been addressed by Network Rail and First Capital.

In respect of bus and coach services, the operators frequently review services and if a demand exists new or additional services will be added by the operator.

Interpretation of Local Plan Policy

This is addressed in the main text of this report.

Economic Issues

Is it considered that the number of jobs created as a result of this application is overstated. The application quotes direct and indirect jobs. Not all of these jobs are likely to be located within the boundary of the airport, some will be indirectly related, such as maintenance of aircraft and vehicles associated with the daily operation of the airport, hotels, car hire companies and other services.

In the same as capacity or transport forecasting is not an exact science, job creation can only be estimated based on recognised forecasting models.

Representations have been made seeking a balance between the economic and environmental cost. In assessing applications accompanied by Environmental Impact Assessments, that balance also needs to consider the social impact. These three elements are covered in the main text of this report.

Concerns have been expressed regarding future destinations that may be reached from LLA and the negative impact that this may have on the UK economy. This is not a matter that can be truly assessed in the context of a planning application. Much of this relates to personal choice of holiday destination. However, in the same way it is difficult to influence UK holiday destinations; there is little that can be done to influence visitors travelling to the UK. These matters are more commercial decisions for the airport operator to address.

In terms of responses in support of the application, many of these are from local businesses (some currently located at the airport) and the benefits that growth will bring to their business.

Flooding

Kimpton Parish Council has specifically identified a flooding issue. A Surface Water Drainage Strategy is being produced by the applicant in conjunction with the Environment Agency and the Water agencies.

This proposes a long term strategy for the airport site and will deal with the potential for flooding as a result of the airport own operations.

Other Comments

Comments such as “the airport is in the wrong location for the level of operations it carries out” and “the application should be withdrawn”, generally relate to wider issues.

For the record, as the application has been submitted to LBC for determination, a process must be followed and a recommendation and resolution to approve made by the Council. The application will then be referred to the National Planning Casework Unit who will consider if the Secretary of State should review the application.

Some respondents made comments about charges for parking in the drop off zone and the cost of parking generally. These are not relevant to the application, but have been referred to the airport operator for information.