

Central Bedfordshire Council Response to:

London Luton Airport Limited Scoping Report (Future Luton: Optimisation) March 2012

And:

London Luton Airport Operations Limited EIA Scoping Report March 2012

Both London Luton Airport Limited (Owners of the Airport) and London Luton Airport Operations Limited (Current operator of the airport) have submitted separate Scoping Reports in advance of preparing and submitting their Environmental Impact Assessment report as part of their planning application for the proposed expansion of the airport.

Airport developments which result in an increase of more than 10million passengers per annum (mppa) should be submitted to the Infrastructure Planning Commission (IPC); In this case as both the LLAL proposal (an increase of around 8mppa) and the LLAOL proposal (an increase of around 4 to6 mppa) are lower that of the IPC trigger figure, they are submitted to Luton Borough Council who is the local planning authority.

As a general comment, I would like to draw attention to the following points:

- Aviation White Paper 2003 Report which, in the absence of other policy, represents current Government Policy explicitly requires a full-length runway for further development of the London Luton Airport. This appears to be contrary to the current expansion proposals.
- Comparing aircraft noise in 2025 with the proposed development and that without the development, may not be the best indicator of the 'worst case scenario' The pattern of increase number of flights, and aircraft improvement may produce one or more years when the increase in aircraft noise may be worse that of 2025. This needs to be carefully and clearly established
- The increase or reduction in the number of night flights, as opposed to the proportion needs to be clearly determined.

LLAL and LLAOL EIA Scoping Reports

Before I make comments on specific topics within each of the two scoping reports I would like to highlight the following issues which are of particular concern to the residents and businesses of Central Bedfordshire:

a) Aircraft noise disturbance

- Strategic Noise Maps, Noise Contours and other relevant technical data are extremely useful; However, what is important is how, and to what extent, the noise disturbance affects a specific community.
- We are mindful of the Government's aim to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. However DEFRA Guidance recognises that there will be occasions where this policy may conflict with the measures to protect quiet areas. The region of Central Bedfordshire affected by the activities of London Luton Airport is largely rural with low background noise and therefore relatively tranquil. Any additional noise will be more noticeable and disruptive than that within an area with higher background noise. This needs to be taken into account when resources are allocated to mitigate the effect of disturbance from aircraft noise.
- Most flights in and out of the airport have some effect on one or more parts of the region. However, noise from landing aircraft during airport's easterly operations is the greatest source of concern, particularly for people living under the flight path in south west central Bedfordshire. Hence we consider that introduction of aircraft noise monitoring systems within these communities could help keep the effect of noise from those aircrafts in check.
- In addition to the above, the part of Central Bedfordshire most affected by the operations of the airport lies almost entirely within the Chilterns Area of Outstanding Natural Beauty and the aircraft noise problem within the Chiltern AONB extends beyond the boundary of Central Bedfordshire. As such the Council expects the airport to explicitly address the problem of noise created by aircrafts which overfly the Chiltern AONB

b) Surface access, traffic and transport

- Impact of additional trips to and from the airport on the surrounding road network, public transport, Luton Parkway stations and walking and cycling routes has to be very carefully considered to ensure that solutions are available and these are fully in place at the time when they are needed.
- Central Bedfordshire and Luton Transport Model (2012) is a useful tool to assess the impact of the airport traffic on local and the wider

road network. Central Bedfordshire Council is happy to discuss arrangements for the use of this Model.

- Increased passenger numbers will result in demand for additional car parking spaces; this together with the limited space within the airport boundary could result in demand for additional off-site carparking within Central Bedfordshire. The EIA needs to address this potential

Specific points

1- London Luton Airport Limited (LLAL) Scoping Report

a) Aircraft Noise and Transport

- No Transport Assessment provided with this scoping report
- Paragraph 5.145 makes clear that the L_{night} index is not sufficient to highlight noise disturbance in an individual location or at specific time; whereas the aggregate of aircraft noise at night which is the L_{night} index may be within the acceptable threshold noise disturbance, specific aircraft noise in a location such as a village below the flight path could cause severe concern. For this reason, it is necessary to identify the effect of the aircraft noise at these specific locations and where necessary to introduce mitigation measures.

b) Landscape and Biodiversity

Application - 12/00333 – Future Luton Optimisation - Ove Arup

This is a detailed Scoping Report - and it is helpful to have included the photographs and maps. (these are particularly useful for the biodiversity)

We do not agree that a landscape and visual assessment should be "scoped out " on the grounds that the development is contained within an existing site.

We recommend that there are targeted landscape studies which would pick up the changes in the skyline caused by the new multi-storey carpark and the resultant landscape impact. We are not given an idea of the scale of the building - so at this stage , without the design parameters, I cannot see how the impact on the surrounding landscape , which includes sensitive sites such as Luton Hoo, Someries Castle (as well as residential areas) can be assessed.

2- London Luton Airport Operations Limited (LLAOL) Scoping Report

a) Aircraft Noise and Transport

- Paragraph 13.10 refers to the 'identification of noise sensitive receptors around the airport' and paragraph 13.15 states 'this (*noise contours*) will be supplemented with a consideration of effects at specific locations' We expect that the noise sensitive locations identified to include residential areas and schools under the flight path.

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b) Landscape and biodiversity

Application -12/00334- LLA operations Ltd - Terence O'Rourke

Our understanding is that this application will not result in an increase in height of the built form, although the density of the massing might increase . Again, it is not proposed that a visual assessment is undertaken. This is more reasonable, but the EIA should still examine the change in skyline and also the night-time impact of the proposed changes

Landscape Enhancement -

Quality design is required to limit the impact on CBC countryside and communities.

Both LBC and CBC planning policies require development to contribute to the landscape quality of the site and it's setting. On site, this will be primarily through hard landscape design and the use of quality materials. Mitigation of new buildings , particularly the Multistorey Car park, requires innovative treatment eg with finishes and features to mitigate visual intrusion, such as a green roof to aid integration and water management .

The redevelopment provides the opportunity to create a richer identity for the Airport - which should be seen as the gateway to the Chilterns. Vernacular materials such as chalk and flint create identity; chalk subsoil could be used to create new calcareous grassland .

The SBDC Landscape Character Assessment describes the adjacent landscape as being "*predominantly exposed with open, long distance views to undeveloped horizonswhich are interrupted by the terminal buildings* " It is acknowledged that the Airport reduces the sensitivity of the landscape , but the area is still considered to be *moderately sensitive to change*.

The strategy for the area emphasises the need to safeguard Someries castle and to conserve the views to and from Luton Hoo.

Development at the Airport should also fund landscape enhancement of roads and lanes in the wider landscape. Hedgerows with standard trees are characteristic , but many would benefit from management or re-establishment where cleared. Such treatment would help to absorb the impact of increased road traffic in the area.

Requirement for increased car parking within CBC area

We are concerned that the increased passenger numbers will result in demand for additional off-site carparking, which can result in storage which detract from the local environment. The EIA needs to address this potential.

Loss of Tranquillity -

This issue is of the highest importance as it affects the health, wellbeing and amenity of residents and the countryside generally. Tranquillity is recognised as a valued landscape attribute and is particularly relevant to communities and also protected landscapes such as the Chiltern's AONB and the Registered Parkland of Luton Hoo , which also falls within the former AGLV.

The EIA will need to explore changes in tranquillity.

Manouchehr Nahvi
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