

Consultation by Luton Borough Council on Planning Application for expansion of London Luton airport

Comments on Transport Assessment, Surface Access Strategy, Travel Plan, Noise Action Plan and Sustainability issues

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Surface Access Strategy

The published Airport Surface Access Strategy sets out to include clearly defined transport objectives, simple performance targets, tangible transport measures and clear areas of responsibility.

This Council supports the above aims and the need for the integrated package of transport measures listed as required to deliver the Airport's Surface Access Strategy provided that the programme of surface access infrastructure development and the associated soft measures are effectively tied to the stages of any agreed expansion plan and the following issues of concern to this council are properly dealt with.

Central Bedfordshire Council is pump-priming investment into promoting the new guided busway service that will serve the airport, as well as actively promoting sustainable travel in areas which include many of the airport's staff and passengers. It would assist the airport travel plan and The Airport Surface Access Strategy to meet their targets were the airport to invest in measures that make public transport access to the airport more attractive for staff and visitors, including funding to increase busway service frequencies to the airport, promotional measures, incentives and other measures deemed fit.

The Surface Strategy document states that the results of bus and coach passenger forecast indicate that despite the assumed increase in passenger numbers the majority of the bus and coach services would still maintain the ability to cater for predicted demands based on existing services. This way of gauging the demand is only valid if all future Bus and coach passenger want to travel where these services cover. Besides that, it ignores the very likely possibility that the passenger demand limitation is a factor of lack of available services to places where people may want to travel.

We expect that the LLAOL will :

- Work with local bus operators and local highway authorities, and if necessary consider making financial contributions to develop an extended network of bus services to link the proposed growth areas in



and around Luton, Dunstable and Houghton Regis with the Airport and surrounding employment areas

- Deliver, as soon as judged necessary by the Local Planning and Highway Authorities, a tracked transit system between the Parkway Railway Station and the Airport and;
- To introduce a *Quality Score* target to increase the quality of the bus or coach services serving the airport

The Council can also support the objectives of widening travel choice, integration and sustainable accessibility, but suggest that airport expansion could offer more scope for developing innovative schemes particularly in the area of influencing modal shift. The airport must take advantage of these opportunities to help develop a sustainable surface access strategy.

We expect that the LLAOL will fully commit to:

- Delivering their contributions to the Strategy when they are needed, and that support will be provided to other authorities in delivery of their schemes.
- Work with Network Rail and the DfT Rail to improve interchange facilities.
- LLAOL aims to maximise the accommodation of projected parking requirements on site. It should also use innovative and best practice parking management methods to encourage more sustainable means of travel.

The Council welcomes the acknowledgement apparent in LLAOL's Surface Access Strategy that Luton Airport is also an inter-modal transport hub and accepts its share of responsibility for the Airport problems which are not their direct responsibility, but are nevertheless exacerbated by the Airport functions. Wherever necessary it will be essential for LLAOL to make financial contributions to help progress the schemes that improve surface access.

Transport Assessment

Transport modelling work undertaken so far to test the impact of the airport expansion only concentrates on roads in and around the airport and Luton. The only place in Central Bedfordshire where the impact of the expansion is considered is along the route of the A505. The information provided as part of the assessment is inadequate as the impact of the traffic resulting from airport activities is more than likely to spread wider in Central Bedfordshire area than just along the A505. In turn there is also likely to be a strategic impact of airport related traffic on non-airport journeys across Central Bedfordshire, which is likely to influence mode (road, rail and bus) and route choice.

It is therefore essential that the recently updated Central Bedfordshire and Luton Transport Model is used to fully test the combined effect of the background traffic, airport generated traffic, and traffic related to the growth area on the local and wider road network of Central Bedfordshire and the surrounding area.

Framework Travel Plan (FTP)

There is a lack of clarity on who, and how the FTP will be managed and monitored. The commitment to a Travel Plan Co-ordinator (TPC) and funding is welcomed. However more definition is required on responsibilities for engaging partner employers on the site and a contingency plan should these not be met. A clearer view of the expectations of other partners in terms of the type of Travel Plan they are expected to produce, how this fits within the LLAOL FTP, who will monitor against overall targets and the decision making process for funding and its allocation.

Aircraft noise

General comments

- 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.
- 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

Specific Points

- This Council Supports the introduction of the Quota Count system (QC) and the resulting ban on operations by aircrafts with a QC of more than 2¹. However, the maximum limit of 10200 aircraft movements per year reported in paragraph 4.28 of the sustainability statement appears to be too high.
- We appreciate the prompt action taken to monitor aircraft noise in Eaton Bray, Studham and Kensworth following our request that aircraft noise in CBC villages under the airport flight path should be regularly monitored and seek assurance that a firm programme is in place to monitor the rest of the parishes under the flight path. In particular village of Caddnton and Slip End. We also seek assurance that this aircraft noise measurement is repeated at relevant intervals to monitor the impact of the changes in the number of aircraft movements over these villages.

POSITION TO DATE

This Council has previously supported a modest expansion of the airport to maintain its 'niche role', indicating a preference for concentrating additional strategic capacity elsewhere in the South East. The Council has been mindful of the potential economic benefits to the sub-region but has consistently raised concerns about the consequential high environmental impact of the more significant expansion plans.

This is reflected in the adopted South Bedfordshire Local Plan which remains part of the statutory plan and states that support for the airport is qualified by its concern that the environmental impact is monitored in consultation with local communities below the flight paths, and minimised so far as possible, and that any future expansion is kept within acceptable environmental limits.

Initial concerns related to the current application

There is insufficient information primarily on the effects of the proposal at the local level within Central Bedfordshire. Given the sensitivity of a number of issues, until a more detailed assessment is undertaken, the Council is unable to ascertain key impacts and possible acceptable mitigations. In particular, key issues that must be addressed further are:

- ❖ There should be appropriate and convenient public transport access to the airport from relevant areas within Central Bedfordshire and in particular Dunstable and Houghton Regis,
- ❖ The reported Transport modelling work appears to be inadequate and that the recently updated Central Bedfordshire and Luton Transport Model should be used to fully test the combined effect of the

background traffic, airport generated traffic, and traffic related to the growth area on the local and the wider road network of Central Bedfordshire and the surrounding area,

- ❖ The programme of surface access infrastructure development and the associated soft measures should be effectively tied to the stages of any agreed expansion plan,
- ❖ A means should be devised to limit passenger numbers, particularly having regard to the effectiveness of environmental safeguards, and there should be a maximum limit on the number of aircraft movements,
- ❖ Aircraft noise and air pollution aspects of the development need to be considered carefully to avoid further harm to residents of Central Bedfordshire, especially in the Parishes under the easterly arrival route. These are Slip End, Caddington, Kensworth, Studham and Whipsnade and to a lesser extent Eaton Bray. Slip End, Caddington and Hyde are also affected by some departure routes.

Recommendation

Accordingly it is recommended that this council should lodge a holding objection in response to this application because insufficient information is provided to satisfy us that there would be no adverse effect resulting from the proposed expansion of the airport. Given the sensitivity of a number of issues, until more detailed assessment is undertaken, the Council is unable to fully ascertain key impacts and possible acceptable mitigations.

*1 Noise classification of the aircrafts with QC2 is 93-95.5 EPNdB (Effective Perceived Noise in decibels)

