

Hitchin Forum's objection to London Luton Airport Operations Limited's (LLAOL's) application for permission to increase passenger numbers to 19mppa 21/00031/VARCON

As with previous LLAOL applications to relax planning conditions to facilitate an increase of passenger numbers to 19mppa, Hitchin Forum strongly opposes this current version.

Whilst we recognise the economic significance of aviation, we believe that there is a currently an opportunity for the aviation industry to move away from a demand-led approach to airport expansion towards an approach which prioritises gains for the environment and quality of life for its neighbours, not just for the convenience of the airport and its customers. These proposals continue to fail to recognise current realities and represent a desire to return to 'business as usual' in an attempt to maximise future profits.

Business Case

Luton airport repeatedly asserts that continued growth of the airport is essential to the economic success of the region. In its letter of December 2019, stating its opposition to the Future Luton proposals, Hitchin Forum warned that

'LLAOL's proposals risk locking Luton and the surrounding area into an economically unhealthy dependence on the fortunes of the airport in advance of a likely changing policy background towards airport expansion. They will substantially increase carbon emissions and negatively impact on the health and quality of life of the airport's neighbours.'

That changing policy background will now also have to reflect the impact of covid-19. With 100,000 deaths and rising, hospitals stretched to breaking point, and two highly infectious new variant strains of the virus being brought into the country by travellers, we are currently living with the consequences of caving-in to demands from business leaders, especially from aviation and tourism, for a lenient approach to border control and quarantine regulations. Industry leaders presume to make pronouncements on the efficacy of tests and quarantine periods with what amounts to wilful ignorance of even the most basic virology or epidemiology. It should by now be apparent that to assume that there will be a 'return to normal', where that 'normal' is anything like the situation at the end of 2019, is naïve, irresponsible and borders on immoral.

Aircraft Noise - predictions and promises

The airport's proposals are based on predictions and promises to reduce noise which are similar to those it has made in the past, and on which it has not delivered. In 2012, it under-predicted the rate of passenger number increase and was over-optimistic about the rate at which carriers would introduce newer, less noisy aircraft into their fleets. It continues to predict that fleet modernisation will happen shortly. Paragraph 3.3.18 of the most recent Environmental Statement tells us that the forecast of fleet modernisation '...is based on current replacement schemes of the airlines using LLA and has considered the financial incentive offered by the Proposed Scheme for airlines to utilise the increased passenger / flight quotas available and so invest further in their fleet'. Any projections based on 'current' replacement schemes, when the impact of the pandemic on airlines' profits, their future willingness to invest and the ability of manufacturers to supply new aircraft are all uncertain, are doomed to be unreliable.

There is, therefore, no reason to believe that, if this application were granted, and passenger numbers grew in the way in which the airport hopes, it would be any more successful at controlling noise than it has been in the past.

Surface Access

Table 9.1 of the Transport Assessment shows that passengers from the East of England make up the second most significant group, after London and the South East, at 32.8% of total. An extra 328,000 passengers travelling from the east of England would therefore result from the proposed overall 1mppa increase. Section 3.3 of the Travel Plan states that 67% of passengers arrive at the airport using private vehicles – a figure taken from Luton Borough Council’s Climate Action Plan Support document of 2020. That equates to about 220,000 extra passengers using private vehicles from the east of England per year. Each private vehicle makes a two-way journey. If we assume an occupancy rate of 2 passengers per vehicle, that would be 220,000 extra vehicle movements per year. A proportion of these vehicle movements might use other routes, but it would be reasonable to say that of the order of 200,000 private vehicles would use the A602 / A505 through Hitchin’s two Air Quality Management Areas each year, contributing to emissions and additional noise.

Luton’s Climate Action Plan Support document goes on to say;

‘In order to reduce emissions from surface transport, it will be imperative that passengers have access to affordable, regular public transport options to shift away from current high levels of private vehicle use. Infrastructure capacity improvements to support the growth in electric vehicles will also be a key enabler for emissions reduction.’

In terms of public transport, just two of the 15 ‘Key coach services’ listed in table 4.2 of the Travel Plan serve any location in the east of England (Cambridge and Stansted airport). These amount to just 26 out of a total of 280 ‘key services’ – under 10% to cater for 32.8% of passengers. There are two regular local bus services from Stevenage calling at Hitchin listed in table 4.3, but these would be unlikely to satisfy the needs of airport passengers – they are not direct, have limited luggage space and there are up to 29 stops between Stevenage and the airport, with a minimum journey time of 45 minutes.

If, as the airport hopes, the figure of 19mppa is achieved by 2024, given the relatively slow improvement in infrastructure to support a move towards electric vehicle use, the associated cautious approach of the public in adopting such vehicles and the need to convince transport operators, already hit hard by covid, of a viable opportunity worthy of investment, Luton Borough Council’s statement is little more than an undeliverable aspiration.

If the Application is permitted, the residents of Stevenage Road, Upper Tilehouse Street and Luton Road in Hitchin will continue to experience increasing levels of noise, congestion and poor quality air. There is nothing in either the Transport Assessment or Travel Plan that will mitigate this.

Conclusion

The airport’s plans are based on a flawed business case that fails to take into account current realities and seeks to perpetuate the airport’s unhealthy economic relationship with Luton and the surrounding area. In this response we have focused on the airport’s failure to control noise violations or to consider the impact of airport traffic on air quality and congestion in Hitchin, both of which are a consequence of the airport’s wholesale dash for growth. That is symptomatic of its wider disregard for the environmental impact resulting from its operations, the most notable of which is the increased contribution of flights to greenhouse emissions, which it acknowledges, but cannot control. The Application should therefore be rejected.