

Q 1a: Responding on behalf of an organisation

Q 1b: The Harpenden Society, a residents group of near 1,000 Members concerned with the quality of life in Harpenden and any untoward influences on it.

Responding as the Chair, Philip Waters, of the Society, based on the views of a widely experienced Committee on behalf of the Members

Q 2a: Impractical to question the whole membership on these 6 points

Q 3: Most Members will have experienced one or more of these detrimental factors to varying degrees but it is the - uncivilised -- noise from LTN aircraft both day and night which is the most irritating, with, as can be seen from the AMR maps showing frequency of noise complaints registered by the Airport staff, many coming from local residents (& by inference, at least some from our Members)

Q 4a: The document presumes continuing rapid increase in demand and asks: Other factors to be considered when forecasting demand?

Yes, the impact of climate change, elaborated under Q 9b, especially following the recent UN/WMO report that global CO₂ levels are continuing to increase and more than expected.

Q 4b: Any comments on 'the need to expand LTN'?

The alleged 'need' should not take precedence over the likely increase in noise, road congestion etc already imposed on Harpenden residents. The lengthy noise-control breach, now in its third year, and vague (p. 28 of the Guide) promises that it's '*expected that cargo carriers [which historically have often used old, noisier planes, including at night] will move to quieter aircraft over time*', are of little comfort to those regularly disturbed by LTN flights *now*. Meanwhile, the climate issue should temper the inevitable "Consultants" enthusiastic 'likely demand' graphs and hopefully require a complete re-assessment.

Q 5a: Comments on the benefits we think will accrue from expansion, nationally/regionally/locally?

Nationally - NEGATIVE as LTN is an > 80% leisure traveller airport and its customers EXPORT their UK-earned wealth abroad to spend it there while at the same time *undermining* UK holiday resorts - part of the (said to be) £18 BILLION p.a. 'Tourism Deficit'

Regionally - relatively small impact on what is a generally prosperous Region (Map p. 34 shows 300+ employees from each of five District Council areas - but of the tens of thousands in work there)

Locally (presumably Luton & immediate surrounds) - no comment

As to JOBS, and in particular, *Jobs created per million additional passengers* - important because used by the Consultants to calculate the economic benefit allegedly accruing from this further major expansion:

Thus, the way in which the ca 125 genuine new on-site jobs per million additional passengers over the 1997-2006 growth period to a 2006 total of ca 4000 (from the

Airport/Council Annual Monitoring Report, AMR) then quickly ballooned to around 300 jobs/mppa and near 10,000 so-called '*LTN-related jobs*', was due to the use of a 'Jobs tree' (p. 32 of the Guide). This more than doubled the *on-site* jobs number by adding in the many employees in companies *from outside* which do business with the Airport and though it may sound not unreasonable, to be *credible* the methodology *needs to be explained*; otherwise it sounds like the economics equivalent of 'creative accounting' with eg an employee on a delivery schedule who calls at the Airport is counted as one additional job

Finally, some of our Members, eg those who never fly [around half the population] or not from Luton, and are annoyed by its noisy aircraft, find the title of this Section and its 'Benefits of Expansion' equivalent in the Guide (p. 31), rather presumptuous.

Q 6a: Any comments on our proposed DCO [Development Consent Order] Application? [which includes an expanded site]

Those Members with a loyalty to Hertfordshire and opposing the expansion plan seem likely to be offended by the inclusion of a sizeable piece of the County to the East of the current site - allegedly to create 'wildflower meadows', additional 'public open space' and currently cropped 'Habitat creation etc' areas, but which seemingly, despite its partly hilly nature, *could be used for future further expansion*. That possibility is of considerable concern to us and we would expect some form of Legal Covenant that that could not happen - though we realise that may not stop LTN from finding a way of having it waived as with their ongoing apparent breach of one of the noise control Planning Conditions (10).

Q 6d: Any comments on the proposals for a second Terminal & new interchange (DART) [a cable-hauled railway up from station to Terminals: not the long-established 'Dublin Area Regional Transport' system!]

Our only comment is that passengers travelling to Parkway station will still have to unload their luggage, get lift/walk across to the DART terminus, transfer to *that* vehicle, wait/travel on that, and unload luggage on arrival at the Terminal: we see little real advantage as to convenience compared with the shuttle bus, though presumably more capacity.

Q 6f: Any comments on the 'landscape proposals'?

We have raised our concern about LTN's acquisition of currently productive (rapeseed) land to the East of the current site under 6a. More generally, we think it impossible to (p. 57) 'integrate the Airport with its surroundings' due to the generally urbanising effect of the expanded facility with (for N. Harpenden residents) its intrusive lighting and ground-testing noise and (for all) the departure/overflight noise; also the the loss of a sense to many of Harpenden being a 'town in the country' whereas if this proposal goes through, and many hope not, it will be more like Horley on the doorstep of Gatwick (& a worry to anyone contemplating moving, with substantially lower house values there despite it too being within a convenient commute of London).

Q 6g: Any comments on the proposed replacement Wigmore Park [as the current one is taken over for the proposed expansion]

Difficult to discern the precise outline of the 'replacement park' from the sketch map on p. 60 of the Guide (poor indication of existing roads & no County Boundary marking), but most

is currently cropped farmland within Hertfordshire and where it seems likely to take years to replicate the current mature trees, shrubs/scrub, and wildflower mix (*including orchids*, whose proposed transplanting from the current Park presumably requires permission under the 1981 Wildlife & Countryside Act). There is a fiercely protective Wigmore residents group, with a website, and so we will not elaborate here.

Q 7a: The goal to have 'at least 45%' accessing LTN by public transport

We suspect the seductive temptation of 'putting the luggage in the car and driving' to LTN, or worse environmentally have someone (friends, taxi) else do so, making TWO return trips, will preclude a 45% reduction of what would be a rapidly increasing total should this expansion proposal go through. Even if a 45% reduction is achieved, there will still be an ADDITIONAL EIGHT MILLION individuals driving in each year if the 32mppa mark is reached. The Guide then misleadingly claims (p. 75) that despite that, there will allegedly be a negligible increase in nearby traffic levels (by only '0.7 to 1.25% depending on time of day') and that's apparently because the authors/Consultants *have averaged the predicted increase across the whole road network of the five surrounding District Council areas*. Also, many who 'arrive by public transport' will actually have driven most of the distance and parked at Slip End for the shuttle bus into the Airport or eg in our residential areas and then used the train or bus for the last 5 miles. Meanwhile, the document admits to some impact of 'additional traffic on local routes to the S. & E.' even though the p. 75 figure *implies(?)* little extra on the already overcrowded A 1081 and B 653 as most will use the 'improved' J. 10/M1. Whether or not so, an overcrowded/overflowing M 1 is of considerable concern to Harpenden residents as the M 1 and its link road is much used by local residents, and emergency services, to access Luton & Dunstable Hospital and beyond - and neither are mentioned in the list of proposed 'Road Improvements' pp 77-80, all being in Luton (except J 10) and Hitchin (not that anything significant could be done to increase the capacity locally of either the A 1081 or B 653 without demolishing housing in the narrow stretches along the N. approach to Harpenden High Street on the A 1081 or through Batford on the B 653).

Nor does it say *WHO is paying for that long list* of 'Road Improvements on pp 77-80. It *should be* LLAL, whose expansion plan is the reason for the need (Air Transport National Consultation, South East, July 2002, DfT, para. 17.13, p.129: 'Airport operators will be expected to meet the full costs' etc), and NOT the general taxpayer and *that should be clearly stated in the text*.

Finally: firstly, the documents should say just how LLAL is intending to get the DfT and rail operators to provide *far more capacity on the rail network*, especially into London as Harpenden commuters already have a struggle to find a seat in the morass of early airport arrivals and their voluminous baggage; and even without the extra 8m ppa or more, the system is close to capacity. In particular, the central through-London 'core section' of the Thameslink commuter route is only two-track through its entire length and is already operating at close to its theoretical 24 trains/hour maximum and mainly of the maximum 12-car length. The mainline service from St Pancras to Nottingham/Sheffield currently has one stop/hour at Parkway station and usually of full-length formations but stopping more would take out several minutes capacity in what is already a quite intensive hourly service. Maybe that time could be shortened slightly by running electric trains on that - Nottingham - service but that was dropped from DfT's electrification plan a few years ago to save cash: perhaps LLAL would consider funding it?

In addition, the Consultation does not refer to the Hertfordshire Council Council Transport Vision 2050 which sets out how modal shift is to be achieved in the County away from the private motor car but we see no real evidence in the LLAL proposal of a meeting of minds in this matter nor how LLAL's plans will achieve substantial modal shift. Clearly this is an area where, if only in a sense of cross-boundary cooperation, LLAL should be asked to put forward much more substantive and detailed information or indeed re-assess the whole 'expansion' project.

Q 7b: Will you use the 'improved public and sustainable transport' to access the airport?

This seems to refer to the aspirations of the 'persuade employees to car-share' kind plus exaggerated claims for the capacity of the rail network (as on pp 70/73 for those Members who access the 'Guide' document - which goes on to list the many *road* improvements mentioned above) and plainly it's difficult for anyone to judge until the promised systems are in place; also, use of the word 'sustainable', a weasel word used to sell almost any idea nowadays, tends to be treated by many with suspicion. Finally, we doubt (p.81) that in an era of increasing automation, a modern airport should require an 'additional 350 airport employees per extra million ppa' (on-site employees or the additional calls by outside delivery men etc?)

Q 8a/c/d on Construction, Earthworks, etc proposed for the expansion as does 8b as its mention of 'phasing in' is of the construction work, not Planning Applicants (?in small stages to avoid Govt intervention?) and irrelevant to Harpenden; so to:

Chapt 9 is on 'Managing the effects' - and some may think contains some of the more misleading, some would say dishonest, comment in the whole Guide (emphasised by the totally inappropriate photos opposite the title page, similarly to Chapter 11!). It contains another presumptuous comment, p. 109, that 'Once operational,' as though there is no doubt of acceptance despite the longstanding warnings about climate change, ramped up by UN comments at the 3/12/19 Madrid Conference (which we realise the authors wouldn't have details of but it would have been sensible to show some sensitivity to such concerns). Particular Questions:

Q 9a: Comments on the proposals to manage/mitigate air pollution during construction and (presumed) operation, the two aspects being blurred

The comment that despatching almost twice the number of aircraft per hour will 'have no significant effect on existing air quality' (p. 110), presumably including *on the apron (which with about 1/4 of current departures in the early 2000s used to violate WHO nitrogen oxide acceptable levels)*, defies belief when the proposed 'mitigation' measures are directed entirely at *on-site vehicle* emissions plus some wishful thinking about new aircraft; but that's a workforce/frequent traveller problem. Comments about air quality monitoring in nearby residential areas including housing under flightpaths claim no problem (worse along busy roads) and of little relevance to Harpenden apart from the effect of the relatively small traffic increase alongside the A 1081/B 653 locally. The list of frankly trivial actions to reduce CO2 emissions on the airfield itself by 'encouraging' the use of electric vehicles, discouraging car access etc *fades into insignificance compared with the CO2 and other*

pollutants the thousands of additional aircraft departures that would follow such an expansion

Q 9b: Any comments on the proposals to lessen greenhouse gas emissions & adapt the expansion to climate change

Disgracefully misleading in simply ignoring the inevitable almost doubling of departing aircraft..

Yes, the impact of climate change, especially following the recent UN/WMO report that global CO₂ levels are continuing to increase and more than expected. Aviation is already a significant contributor and as *other* carbon sources are *reduced* (eg as 'Renewables' replace fossil fuels), aviation will quickly become *one of the major contributors* (possibly up to 25% of the total by 2050). 'Offsetting' this carbon by planting trees seems like *a ploy to divert attention from the cause* and anyway would require unacceptable areas of good agricultural land to have any real effect. Those behind LTN's planned expansion should realise that slowing or even reversing aviation's headlong growth may have to be considered to reduce the carbon emissions (and the additional warming effect of contrails). Their Plan to deal with LTN's carbon emissions simply by proudly listing a series of - relatively insignificant - measures to reduce just those originating from the airfield itself and ignoring those far greater emissions from the thousands of flights originating there, is indefensible! (as at para 3.11 in the extended Guide in which after admitting that most emissions are from air traffic rather than the airfield say "but we have no control over that" - and so are free to ignore!: plainly LTN, as any airport, that facilitates a major increase in emissions is ultimately, along with the airline, responsible for them and it is high time Govts and ICAO decided a policy to deal with the problem longterm.

[Note: In some detail because of its *sudden emergence* as a point needing an answer]

Q 9e: Other comments on the LTN proposals to manage the effects of expansion

Misguided: what's needed is a TOTAL RE-ASSESSMENT of the whole outdated scheme, with the possibility that soon aviation may be restricted to international genuine zero carbon operations

Q 10a: Comments on proposed land acquisition - covered under Q 6a

Q 10b: Comments on the proposed 'noise insulation' scheme

It's NOT insulation but simply mitigation [making less bad] - and is no use in the garden. Only applies to those very close to the runway so of no interest to Harpenden despite the considerable annoyance caused locally.

Q 11 – Further comments

With the last major expansion of 10mppa to 18mppa, and held at that <10 mppa increase to avoid the need to go through the Govt Planning Inspectorate (but readily agreed by local Plg Auth, Luton Council), having barely run its course, this proposal was very bad news to many local residents already disturbed by LTN's current overflights and in no way taken in by vague promises of changes in flightpaths which will allegedly reduce the nuisance [some would argue only substantial financial compensation would ease the annoyance, especially at night, the disturbance while in the garden, etc.]

It seems that this latest Plan, very much encouraged by Luton Council, a major beneficiary, is to the detriment of those in nearby Districts as to noise, traffic, urbanisation etc, with no democratic say in the matter, apart from via 'Consultations' such as this. Although some of our Members may use the Airport, many in the area (from the AMR maps showing the origin of noise complaints) are plainly annoyed by noise disturbance, including at night which is particularly uncivilised. Hopefully the Govt will react to the climate 'crisis' and hold back on this proposal until methods of greatly reducing airborne CO2 emissions are found.

Q 12a: [Name, address,e-mail]

Submitted by the Chair of the Harpenden Society on behalf of its Members: Philip Waters, 10 Manland Way, Harpenden, AL5 4QS; e-mail: philwaters7@hotmail.com

Yes happy to be contacted

Q 12b: Impractical to say for a large group

On behalf of The Harpenden Society Committee and its Members, Harpenden, 11th December, 2019