

Development Control Manager
Luton Borough Council
Town Hall
Luton
LU1 2BQ

11 February 2013

Dear Sir,

**Luton Airport – planning application to Luton Borough Council
to increase capacity to support 18 million passengers per year.**

We are the civic society of Harpenden, which is located just a few miles south of Luton and its airport. We have a membership of over 1,000.

London Luton Airport Operations Ltd (LLAOL) has recently applied to Luton Borough Council, its local planning authority and the owner of the airport, to increase the capacity of the airport.

We are writing to say that we object to the proposal. In addition we firmly believe that you lack the technical resource to consider it fully, that your conflicts of interest mean that you are unable to consider it with proper impartiality and that they also mean your decision would not carry public confidence.

Our reasons are:

Luton Borough Council's crippling conflict of interest

We believe Luton Borough Council (LBC) will not adequately assess the impact of this major development on the wider community as it is seriously handicapped by conflicts of interest, whether you acknowledge them or not. It is to be expected that any local planning authority would have an economic interest in the assets in its borough, arising from their rateable income, but LBC's interest goes far beyond this. You receive a substantial levy on each passenger passing through the airport, amounting to £25 million in 2011. This is likely to prevent the impartial exercise of your judgment in the application to double passenger numbers.

Secondly, LBC's close connection with LLAOL's wholly owned subsidiary London Luton Airport Ltd (LLAL) can be seen from the fact that two LBC councillors (Messrs Hussain and Franks) are directors of LLAL, and have been since 2007. LBC and the airport are too closely connected for LBC to be impartial, or to be seen to be impartial.

Road and rail traffic

Currently two thirds of Luton Airport's passengers arrive and leave by road. Assuming that this proportion stays the same with double the passengers, we calculated that there would be an extra 7,500 cars per day on the roads through and near Harpenden over and above those using the M1 for access. The local roads, already heavily congested for much of the day, are not designed for this extra traffic and will not cope.

Meanwhile, the rail line, Thameslink, is already a very overcrowded commuter route/ Yet LLAOL say they want to increase the proportion of passengers who use the railway, while at the same time complaining to the House of Commons Transport Select Committee on 5 December 2012 about the Thameslink line's inadequate capacity for the times they need. It is hard to square these complaints with LLAOL's hopes to increase the number of their passengers using the railway, even at the current number using the airport, let alone for a doubling of the airport throughput. That means that the estimate of an extra 7,500 cars per day will be too low.

On top of that, Thameslink's current capacity, which LLAOL say is inadequate, will now be restricted by the needs of the new Helioslough road/rail freight depot at Radlett. Network Rail say that the new depot will cause capacity constraints on the Thameslink line, and "detriment to passenger services" will result.

LBC is not equipped to judge the strains on the infrastructure outside its own district. That is a national matter. It therefore seems to us to be crucial that it is studied by a properly resourced body independent of LBC. The improvements to Junction 10A serving the airport are regarded as a National Significant Infrastructure Project. The infrastructure implications of LLAOL's application to double its passenger numbers should be assessed in the same way.

Noise

LLAOL has no limit on its night-time operations other than a largely ineffective noise penalty system. Big increases in 6 am departures are planned. Although some of the official routes largely avoid Harpenden, one of them goes right over the town. In addition not all aircraft keep to the scheduled route, and they too often overfly the town. The proposal would virtually double this noise nuisance.

Conclusion

We object in the strongest possible terms to the application and to your ability to decide it. We urge you to support our request to Government that the application is treated as a Nationally Significant Infrastructure Project.

Yours sincerely

CL Marsden
Chairman
The Harpenden Society