



Slip End Parish Council

12th February 2021.

We, Slip End Parish Council, write in response to planning application 21/00031/VARCON of January 2021 to raise a number of concerns.

We have a long engagement with LLA expansion plans, including the LLAL 2039 consultation of 2019 and the Luton Airport Expansion plan (19 mppa) of 2020. We note with some concern that the Slip End Parish Council is not listed in the Wider Council stakeholder list at the end of the LLA – 19mppa Consultation Summary Report (LLA19CSR). Whether this is a clerical error or a lack of interest in our opinion we know not. To remedy this deficiency we attach copies of our responses to both consultations – both are relevant to the present planning application in that environmental and economic concerns about airport expansion are the same whether the target numbers are 19mppa in 2021 or 32mppa in 2035.

The LLA19CSR report comprehensively summarises the environmental and economic objections to raising the passenger limit to 19mppa, to such an extent that we are surprised that LLA wish to ignore it and proceed with yet another planning proposal. Many of our concerns are covered by the report, others are not (see attached letters). Rather than cover old ground we suggest that LLA19CSR substantially represents our view point and move on to consider the proposed changes:

We object to the proposed change to Condition 8 of 15/00950/VARCON to raise the annual passenger cap from 18mppa to 19mppa. The objections raised in LLA19CSR to growth are comprehensive and should be addressed first. In particular the claims that reaching 18mppa 9 years ahead of target is a great achievement should be withdrawn by LLA. It is apparent that the infrastructure which sustained this growth is inadequate and should be improved first. The fall in aircraft movements during covid-19 offers the opportunity to do this.

We object to the proposed change to Condition 10 of 15/00950/VARCON to ease noise restrictions. LLA has a poor record in enforcing noise limits, particularly for night and shoulder sectors. The reason given for easing limits is that new generation aircraft are not coming on line as quickly as originally projected. We would point out that the noise reductions from new generation planes have been less than anticipated, Covid-19 will delay fleet modernization yet further, and that LLA has persistently refused to provide growth projections for mid-haul routes using wide-bodied jets. Flights of this type are slower and noisier on take off, and have increased substantially in the last couple of years (ie the Luton-Tel Aviv route), which impacts greatly on communities, such as Slip End, which are located directly under the flight path. This is particularly ominous given EIA vol 2 suggests the use of 'larger aircraft' will mitigate the increase in passenger numbers (section 3.3.10). We suggest LLA should focus on being the 'good neighbour' it claims to be, and address current shortfalls in noise mitigation.

We are also disappointed that proposed changes to Condition 22 (Car parking management) and Condition 24 (Travel plan) contain no details or proposals whatsoever. 'Fly-parking' in surrounding communities seems to be an issue that LLA refuses to engage with.

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Overall, in these times of economic uncertainty and massive downturn in the aviation industry, there is no case for ANY expansion in LLA capability – 92% of respondents summarized in LLA19CSR (section 5.10) believe there will be no economic growth resulting from such an expansion. Yet LLA persists in promoting this vanity project whilst ignoring the very consultancy documents it commissioned. We therefore strongly object to planning proposal 21/00031/VAR.

Yours faithfully

Peter Segal
Parish Clerk
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