



# HARPENDEN TOWN COUNCIL

*CLOSER TO THE COMMUNITY*



**Town Mayor – Councillor Rosemary Farmer**

*The Town Mayor's charities are:*

*The Harpenden Trust and The Royal Anglian Regiment Benevolent Charity*

25 September 2013

Ref: RF/DW/PS/E19/33061

Submitted to the Airports Commission by email to [airport.proposals@airports.gsi.gov.uk](mailto:airport.proposals@airports.gsi.gov.uk)

## **Long Term Options:**

***London Luton Airport - Submission to the Airports Commission***

***Weston Williamson and Partners***

I write in response to the submission from Weston Williamson and Partners dated 19 July 2013 and their proposals for a four runway hub airport south of Luton.

Harpenden Town Council is disappointed that the promoter of this option has failed to observe the advice of the Commission in Guidance Document 01: "Submitting evidence and proposals to the Airports Commission" and Guidance Document 02: "Long Term Capacity Options: Sift Criteria". Adherence to these requirements would have served to illustrate the short comings and impracticality of this proposal.

Using the Commission's sift criteria, examples of issues with the proposal are set out below.

### **Sift Criteria**

### **Issues**

#### **Strategic Fit**

- The east-west operations of this proposed hub are understood to be incompatible with continuing operations at Stansted. This would result in the loss at Luton and Stansted of at least 40 million passengers per annum of largely short haul, point to point capacity.
- Rail access to London would be via the Thameslink/Midland Mainline route. It is completely unrealistic that St Pancras International could handle passenger volumes over and above that to be delivered by the Thameslink Programme and Midland Mainline electrification and would presumably require London's Eurostar and HS1 services to be relocated.

<b>Sift Criteria</b>	<b>Issues</b>
Economy	<ul style="list-style-type: none"> <li>• Virtually the only economic argument used is the supposition of infrastructure investment savings the location delivers given the area's good communication links. As outlined above, in relation to rail, the proposal takes absolutely no account of planned growth and capacities.</li> <li>• The site is closely surrounded by significant settled communities – Harpenden, Luton, Dunstable, Stevenage, Hitchin, Welwyn Garden City, Hatfield, St Albans, Hemel Hempstead and Tring. No estimate is made of dislocation across these communities.</li> </ul>
Surface Access	<ul style="list-style-type: none"> <li>• The proposal fails to identify what improvements would be required to the existing transport links and their cost.</li> <li>• There is no supporting analysis for the proposed Tring to Stevenage light rail link and the challenges of establishing a route across the Chiltern Hills chalk escarpment.</li> </ul>
Environment	<ul style="list-style-type: none"> <li>• Given the proximity of the communities highlighted above, the estimate provided by the promoters for the people affected by noise should be considered little more than conjecture.</li> <li>• The submission identifies villages and hamlets that would be demolished but doesn't include East Hyde.</li> <li>• Two communities, Slip End and Markyate with population totalling some 5,000, would face intolerable conditions.</li> <li>• The suggested perimeter would be less than 1800m from housing in Harpenden – a town with a population of some 30,000.</li> <li>• While the devastating impact on Grade 1 listed Luton Hoo is identified, the submission fails to identify the impact on the Chilterns Area of Outstanding Natural Beauty.</li> </ul>
People Cost	<ul style="list-style-type: none"> <li>• The submission fails to address the Commission's requirements.</li> <li>• The estimate of £25bn is not broken down as requested by the Commission into its component parts.</li> <li>• Have the costs of buying out the owners/operators of London Luton and London Stansted been included?</li> <li>• The thrust is that costs will be lower than alternative sites because these will require £15-28bn to be spent on new infrastructure.</li> <li>• It appears the proposer assumes the M1, A1M, M25, Midland Mainline, Thameslink and St Pancras International have infinite capacity.</li> </ul>
Operational Viability	<ul style="list-style-type: none"> <li>• The submission fails to address the Commission's requirements.</li> <li>• There is no recognition of the site's propensity to attract fog and snow.</li> </ul>
Deliverability	<ul style="list-style-type: none"> <li>• The site is part of the Chilterns chalk escarpment. The topography is challenging and the submission takes no account of the fact that the existing Luton runway lies 160m above sea level while parts of the site are as low as 100m above sea level.</li> <li>• Selection of this site would have an immediate impact upon the investment that can be expected at London Luton and London Stansted over the short and medium term resulting in a degradation of operational effectiveness and customer experience.</li> </ul>

The promoter's failure to address adequately the Commission's requirements and provide a standard of evidence to which the Town Council and others can respond, presumably means that it will not meet the Commission's test for it to be considered as a credible long-term proposal.

If the Commission is nevertheless minded to include the proposal as a long-term option, it is considered that Weston Williamson be required in the first instance to meet the Commission's published evidence requirements at its expense and that a further opportunity for consultation is provided.

Finally, following consideration of the Roskill Commission Report, the Secretary of State for Trade and Industry concluded in a statement to the House of Commons on 26 April 1971, that in relation to the 3 inland sites considered in Bucks, Herts and Beds, the Government's view was that "irreversible damage....would be done to large tracts of countryside and to many settled communities by the creation of a airport at any of the three inland sites...." That conclusion, relating as it did to reasonably remote, flat sites is even more apposite in relation to this proposal for a site on a chalk escarpment so close to so many settled communities.

I trust that the Council's comments and observations will be given due consideration.

Yours faithfully



Councillor Rosemary Farmer  
**Town Mayor**