



19th August 2022

Re: **PINS Reference : APP/B0230/V/22/3296455**

Luton Borough Council Application number: 21/00031/VARCON)

Dear Sir / Madam

Thank you for inviting me to respond to the Addendum to the Non Technical Summary of LLA's plans – described as "Luton Airport Expansion - 19 mppa" – but for which I read "Luton Airport rewrite of conditions protecting residential amenity"

I have just two comments to make on the addendum.

- 1) We are told that the breaches of the noise conditions that occurred in 2017, 2018 and 2019 were caused by the introduction of "next generation" quieter jets being slower than forecast, and we are asked to forgive this because these were factors outside of the airport operator's control. Reading this addendum, it is clear that once again the applicant is relying on events outside of their control – i.e. the introduction of aircraft with a greater passenger capacity, keeping ATM's lower, and that those aircraft will be quieter in operation than those in use today. The addendum does not offer any explanation of why their reliance on factors outside of their direct control should now be trusted, when recent experience suggests the contrary?

Paragraph 113 from the original LBC Planning Officers report on 12/01400/FUL, approved by the Development Control Committee on 20th December 2013 states:

113. It can be seen that the predicted 1999 taken from the 1997 ES levels were higher than actual 1999 levels (0.2 square kilometres for daytime noise. and 22.8 square kilometres for night time noise). Further it can also be seen that the current operation of the Airport is well below these levels. The requirement for Condition 12 for night time noise to be limited to an area of 37.2 sq.km for the 48-72 Leq dBA 8 hour (23.00 – 07.00) contour is ambitious but will ensure that lower noise levels are achieved in 2028 than currently predicted by LLAOL. **However with strict controls on growth and measures such as fleet modernisation being maximised, this lower area is considered to be practicable and achievable. It also ensures additional benefits in terms of residential amenity in accordance with policy.** (my highlight).

Once permission was obtained, the Growth Incentive Scheme, signed by both Luton Borough Council and the Airport Operator, resulted in the applicant maximising growth rather than exercising "strict controls" and no measures have ever been taken to ensure fleet modernisation was maximised.

The premise that conditions can be ignored and then re-written does not reflect well on the Local Planning Authority.

- 2) It is bitterly disappointing to read that so many environmental consequences of this variation are adjudged to be adverse impacts on health, noise and climate – dismissing these as insignificant or negligible. The various environmental crises that the world faces today are all caused by hundreds of thousands of “negligible” adverse impacts. Increasingly it is acknowledged that to meet our commitments to net zero, championed by the Climate Change Committee and reinforced by the law courts, means that there is no spare capacity for any adverse impacts.

Yours Faithfully



Nigel Green