HarpendenSky.com
The Airtraffic Impact Reduction Campaign
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PUBLIC INQUIRY STATEMENT

Subject	210/00031/VARCON Environmental Impact Assessment [EIA]
Originator	Neil MacArthur representing HarpendenSky.com
Contact	
Date	Friday 26 August 2022

The original Dept for Leveling Up Housing & Communities [DLUHC] call-in advice dated 6April 2022 highlighted the SoS particularly wished to be informed on two key subjects [i] the extent to which the proposed development is consistent with Government policies on meeting the challenge of climate change plus [ii] Government policies on conserving & enhancing the natural environment.

In accordance with the DLUHC aims, we submit the following statement to the Public Inquiry primarily in response to the LLAOL EIA & Addendum Summary July 2022 to which the subject numbering refers.

[4.2] Air Quality: the EIA makes no reference to the Environment Act 2021 [EA 2021] Environmental Targets Particulate Matter [PM] & in particular PM2.5 emissions from aircraft insofar as the targets in force are concerned or how they will be managed when the required future targets are set. The LLAOL application is for 1million extra "passengers" per annum [PPA] so the carrier air quality impact must be included.

For example, the EIA NTS item 4.2.3 makes no reference to the change in PM2.5 emissions from increased airtraffic related to 1million extra PPA [not just cars trucks & non-road vehicles] & similarly in the Assessment of Effects. PM2.5 emissions are made directly by aircraft [black carbon, primary organic matter & sulfate]. These gaps in the EIA Addendum must be identified, assessed & published.

EA 2021 states: "*Responsibility for tackling local air pollution will **now be shared** with designated relevant public authorities, all tiers of local government **and neighbouring authorities***". There has been no attempt by LLAOL to share responsibility for air quality management with regard to mitigating the impact of greenhouse gasses resulting from this application & the Luton Borough Council [LBC] Annual Air Quality Status Report highlights where limits on NO2 & PM2.5 are already being breached before accounting for any expansion in the number of flights [eg increasing to 19mppa equates to c10,000 additional flights with a substantial increase in CO2, NO2, PM2.5].

Hertfordshire County Council [HCC] declared a Climate Emergency in July 2019 & published a Sustainability Strategy which promises "clean air for all by 2030" but this policy will be impossible to achieve with an expanding Luton Airport capacity on the borders between Bedfordshire & Hertfordshire. This is an example of EIA ignoring the EA2021 requirement for local collaboration on air quality management. Therefore as due process has not been followed this application should be denied.

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[4.3] Climate: Dept for Business Energy Industrial Strategy [DfBEIS] Sixth Carbon Budget: this policy contains a commitment to **reduce emissions by 2030 by at least 68% compared to 1990 levels** which includes aviation. LLAOL currently emits c2million tonnes of CO2 annually, plus NOx, PM2.5 etc at 18million ppa [excl road transport impact]. This application will increase CO2 emissions by c80k tones annually, plus other GHGs, in direct conflict with the DfBIS reduction objective. Therefore this application should be denied.

[4.5] Human Health: Airtraffic is a major emitter of CO2, NOx, PM2.5 & the population impact from the additional 1million PPA airtraffic must be formally identified & assessed in conjunction with a reduction in the "business as usual" 18million PPA airtraffic emissions. For example, there are 38 care homes in Luton & PM2.5 exposure has a significant negative impact on the resident health so the potential emissions including PM2.5 impact must be known.

Luton is established as one of the "*top 4 UK areas for PM2.5 related deaths as percentage of total deaths in UK"* Source: Centre for Cities & consequently LBC has published a Climate Emergency. Luton Airport air & related road traffic is the primary source of CO2, NOx & PM2.5 emissions in the region which will become worse with any further airport expansion. The current PM2.5 emission level is double the lowest in the UK.

HarpendenSky
HarpendenSky.com is a campaign group opposed to the impact of airtraffic noise and emissions affecting residents in and around the town of Harpenden in Hertfordshire www.HarpendenSky.com.

Thankyou for your consideration.

End of Statement.