For official use only (date received): 22/05/2022 11:15:58

The Planning Inspectorate

COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/B0230/V/22/3296455

DETAILS OF THE CASE

Appeal Reference	APP/B0230/V/22/3296455
Application By	LONDON LUTON AIRPORT OPERATIONS LIMITED (LLAOL)
Site Address	London Luton Airport Airport Way Luton LU2 9LY Grid Ref Easting: 511908 Grid Ref Northing: 220942

SENDER DETAILS

Name	DR SIMON PENDER
Address	[redacted]

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Applicant
- ☐ Agent
- ☑ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground
- ☑ Interested Party/Person Correspondence
- ☐ Other

YOUR COMMENTS ON THE CASE

I live in a rural area to the south of the airport, and write having extensively reviewed Luton Airport's documentation for the proposed project, which I consider to be significantly biased in their representation of the evidence, shaped by a cozy and unobjective relationship with Luton Council. The proposed increase in flight volumes is certain to increase noise levels to my community (outside Luton Council's area of responsibility), and detract significantly from an area of exceptional natural beauty. I can say this with certainty because the change in flight numbers through the course of the pandemic is already having a significant disruptive effect.

Roads in this area are already under significant stress due to airport traffic, in particular the B653 Lower Luton Road. Other, smaller roads through rural communities, many of which are not wide enough for two large vehicles to pass safely, see significant airport traffic. This is certain to rise under the proposals, increasing both congestion and disruption to the life of rural communities.

There is no good national-level case for expansion at Luton at this time. UK flight volumes remain roughly 40% below their pre-pandemic peak, with no sign that this will recover given ongoing testing requirements and border restrictions around the world. Even if there were a national capacity requirement at this time, it is not evident that Luton would be a good choice for expansion, given the far greater economic significance of Heathrow, with its dramatically better transport connectivity and its role as a major hub airport.

Luton Rising's proposed expansion is unlikely to drive organic growth in flight volumes: instead, it appears designed to take market share from other airports. This means that the anticipated economic growth is also likely simply to move employment around the country, rather than to create genuinely new opportunities.

The Draft Need Case significantly overstates Luton's role in the 'Oxford-Cambridge Arc'. As a former Cambridge academic and resident, I can confidently say that it has none of any significance. Luton is not the closest or most convenient airport for either city (those are Heathrow and Stansted respectively), and it has no meaningful connections to the innovation or industry associated with the two universities. If it did, the 'pockets of deprivation' cited in the Draft Need Case simply would not be so prominent. It is also clear that the routes typically served by Luton Airport have no connection with business or academia. The majority are short-haul routes to holiday destinations around Europe, combined with routes serving migrant workers from Eastern Europe. Even here, the Draft Need Case misrepresents its prospects: claiming that the airport is ‘well placed’ to attract key inbound visitors from European markets including Romania and Poland, the Draft Need Case does not reflect the impact of Brexit, in particular on economic migration and short-term employment movements from Eastern Europe. By the Draft Need Case’s own statistics (inset 6.4), flights to/from Eastern Europe accounted for some 40% of Luton’s business. Yet the statistics are cut off from 2019, meaning that the proposal takes no account of the impact of Brexit on this very high fraction of Luton Airport’s business. This means the proposals fail to consider critical relevant evidence: in seeking to increase capacity, Luton Rising has simply ignored a substantial factor depressing likely future demand, on a logic of 'build it and they will come'.

The Draft Need Case also misrepresents the proposal's green credentials, essentially disavowing Luton Rising's responsibility for increased emissions, pollution and noise as a matter for national-level Government policy. A number of caps are offered as reassurance: this merely limits the significant growth in emissions, pollution and noise associated with the plans, but at far higher levels than the present. We can take no comfort from these: it is evident that Luton Rising's strategy, like that of most UK airports, is to expand on the ground then maximise throughput regardless of impacts. We should be clear that the proposal is to nearly double the airport’s carbon emissions, principally through flight operations, even assuming increasingly efficient aircraft. Saying that the Proposed Development ‘would not materially affect the UK’s ability to meet its carbon reduction targets’ is simply shifting the problem elsewhere, i.e. assuming that other airports will reduce volumes to compensate. That is not a rational assumption.

The Emerging Transport Strategy document takes no account of impacts on minor roads beyond the immediate vicinity of the airport (in particular the B653 Lower Luton Road), assuming that passengers will only connect to the motorway or to public transport such as the already overcrowded Thameslink rail line. As such, it should be rejected on the basis of failure to consider critical relevant evidence.