Friends of Wigmore Park,
[redacted]

18th May 2022

Holly Dutton,
The Planning Inspectorate,
Room 3/J Kite Wing,
Temple Quay House,
2 The Square,
Bristol,
BS1 6PN

PINS REF:APP/B0230/V/22/3296455

Dear Ms Dutton,

Friends of Wigmore Park wish to comment on planning application 21/00031/VARCON, by London Luton Airport Operations Ltd (LLAOL).

We would like first to register the following background information for this application. We base this on the history of LLAOL, and the planning authority, Luton Borough Council (LBC), and why we believe that the planning process has been manipulated, for the commercial benefit of both LBC and LLAOL.

LLAOL has the concession to run London Luton Airport on behalf of LBC, the owner of the airport via its company Luton Rising (LR). LBC holds 100% of Luton Rising shares with the voting directors all being politically appointed councillor directors.

Luton Rising is finalising its DCO application to government to increase the capacity of the airport from 18m to 32m passengers. The proposal is to do this in two phases. Phase 1, which encompasses this planning application, is to increase capacity from 18m to 21.5m by utilising the existing terminal but breaking out of its existing airport boundary by building temporary car parks on the adjoining Wigmore Valley Park* and by encroaching onto a designated County Wildlife Site contained within the park.

Phase 2 is to build a second terminal, permanent car parking and associated infrastructure on Wigmore Valley Park, the remaining part of the County Wildlife Site, and on fields beyond. A 'replacement park', far less accessible to local people, and which could take some 40 years to develop the same biodiversity, would be provided across the border in Hertfordshire.

Last year LBC approved a planning application by its company LR, for New Century Park Business Park, reference 17/02300. This application would sit on much of the same land

required for airport expansion and was seen as the enabler for airport expansion, as it contains a £130m dual carriageway to serve Terminal 2. It is the view of many opposition groups that this was a deliberate ploy to keep the access road out of the DCO process by attaching it to the application for the New Century Park Business Park. To date the Council has yet to make a business case for this major road to serve just a small business park, and has failed to secure funding, but importantly this road has planning permission.

We believe that the application you are now considering is part of a two-pronged exercise by LBC/LLAOL, along with the New Century Park plan, to enable passenger growth to 21.5 million passengers per annum, or as we show later, actually to 23 million, by bypassing the need for a DCO application, as it could be achieved at local level by a series of applications like the one before you now.

Friends of Wigmore Park would argue that the planning application you are considering should take into account, on environmental grounds, the adjoining Wigmore Valley Park. Expansion to 19m would put much of the park into jeopardy including the loss of the fringes of the County Wildlife Site, which form important wildlife corridors, as there would be a requirement for further parking that this application ignores.

We also consider that this application to add a million passengers undermines the DCO submission, as the intention of both this and the DCO application is to expand the airport above 18m.

The masterplan for 19m passengers included in this planning application states that if approved the airport might grow above 18m passengers in the year 2024 yet by then the DCO could also have been decided. This could lead to LLAOL having this planning decision approved while the DCO submission by Luton Rising is rejected, yet the DCO also covers expansion between 18m and 19m passengers.

Climate emergency

But the masterplan is out of date, and does not take into account the government decision in May 2021 to include climate emissions from aviation and shipping in planning decisions. This means that plans are either inadequate or non-existent to tackle the 99% of climate emissions due to the airport (48% from surface transport and 51% from planes in the air). An up-to-date masterplan to reflect this was required for the approval on 1st December 2021 for 19m passengers, so the approval was invalid. The subsequent website for Luton Rising, LBC's airport company, is full of aspirations, rather than targeted or effective action plans with dates and figures showing how emissions would be cut year on year.

Tackling the climate crisis is urgent – the government Climate Committee has recommended there should no airport expansion.

The government loaned LBC £35m on condition it **reduces** reliance on the airport. Planning must therefore focus on carbon-neutral projects, and partnerships with businesses that offer a green recovery from the pandemic.

If this application were approved and the DCO submission rejected, Luton Borough Council's partner LLAOL, we believe, could in future put in smaller applications to build up passenger numbers to 23m, as it is Council policy to expand the airport to 32m.

In the agenda document pack to the Council Executive dated 4th April 2022, Luton Rising submitted a report stating that the airport could be expanded up to 23m passengers using the existing terminal rather than the 21.5m passengers quoted in the present DCO documentation.

https://democracy.luton.gov.uk/cmis5public/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=EA6e2nNzvWmW3tKYek7g2W4FI7kBxAOAzvW%2bsG5Avym1DEUmz3qsuA%3d%3d&rUzwRPf%2bZ3zd4E7Ikn8Lyw%3d%3d=pwRE6AGJFLDNlh225F5QMaQWCtPHwdhUfCZ%2fLUQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9IXnlg%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d

In this report on page 51 it states:

f. Growth post consent (strategy)
We continue to work closely with LLAOL as they bring forward their plans for 19 million passengers per annum (mppa) (assuming that planning permission is confirmed) in advance of the DCO being consented.
Ongoing discussion with LLAOL incudes detail matters around how and when the planning regime should switch from the current 18 mppa (or 19 mppa) local planning conditions to those contained in the DCO and how DCO consented works can be delivered. The current working assumption is that this will be done through a progressive partnership with negotiations ongoing to establish this at the earliest opportunity. DCO consented growth would then be delivered through the new partnership with costs and benefits shared more equitably than is currently the case. The DCO will make provision for growth through the existing terminal to be extended to circa 23 mppa to ease the path to further growth by reducing the likelihood of prolonged periods of stagnation. The progressive partnership approach is anticipated to include provision to trigger further extension of the partnership to deliver a second terminal and additional infrastructure before the existing airport becomes capacity constrained.

As can be seen in the above statement, we believe there to be clear evidence that there is an unhealthy relationship between the applicant and the planning authority. We also believe that it shows an underlying trend that the quality of life for local residents living with the operations of Luton Airport, clearly comes second to the commercial income to both LLAOL and LBC/LR. The planning committee members from the ruling party, although meant to be independent, are aware of this policy and all voted in favour of expansion, so we are pleased that this application has been called-in.

Approval of this application could allow LLAOL or LR to get around any rejection of the DCO by putting in additional smaller increases. As such we oppose this application, as it will be a springboard for further applications if the DCO is rejected. This will put Wigmore Valley Park and all of its Country Wildlife Site (voted Best Park in Bedfordshire) in 2019 at further risk.

Unacceptable pollution and noise

Luton's population has had significant respiratory health problems for a number of years. In 2017 LBC published a report stating that an estimated 86 Luton residents' deaths a year have been attributed to particulate air pollution with 1,004 associated life years lost.

https://democracy.luton.gov.uk/cmis5public/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=hxY08tBWtxpLsz4ruBp4K2WuIeZuuOZ9ZLsywTJcyML89d54v0mlhQ%3D%3D&rUzwRPf%2BZ3zd4E7Ikn8Lyw%3D%3D=pwRE6AGJFLDNlh225F5QMaQWCtPHwdhUfCZ%2FLUQzgA2uL5jNRG4jdQ%3D%3D&mCTIbCubSFfXsDGW9IXnlg%3D%3D=hFflUdN3100%3D&kCx1AnS9%2FpWZQ40DXFvdEw%3D%3D=hFflUdN3100%3D&uJovDxwdjMPoYv%2BAJvYtyA%3D%3D=ctNJFf55vVA%3D&FgPlIEJYlotS%2BYGoBi5olA%3D%3D=NHdURQburHA%3D&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJFf55vVA%3D&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJFf55vVA%3D&WGewmoAfeNQ16B2MHuCpMRKZMwaG1PaO=ctNJFf55vVA%3D

In 2019, a report by The British Heart Foundation showed Luton to be one of the most polluted towns in UK. This was due to the fastest growing airport in the UK, and the fastest growing amount of traffic accessing it.

https://www.itv.com/news/anglia/2019-12-05/luton-residents-breathe-some-of-the-most-polluted-air-in-the-east-of-england-study-shows

A further report by the British Lung Foundation in the same year showed Luton to be the UK's worst polluted town.

https://inews.co.uk/news/environment/luton-named-as-having-worst-air-pollution-in-uk-city-layout-377151

In 2021 a joint report by Asthma UK and British Lung Foundation stated that every care home in Luton exceeds the World Health Organisation levels for pollution.

Dangerously high levels of toxic air in Luton putting elderly at risk - Bedfordshire Live

Poor health increases hardship and poverty, so expansion is incompatible with LBC's aim of zero poverty by 2040. Local people are caught up in airport traffic, and a pollution corridor is the worst place to be for health. It is also bad for the local economy, as time wasted in queues affects both hours at work and people's personal time.

A plateau above a densely populated town, in a valley where pollution gathers, is simply the wrong place for an airport of this size, and returning to passenger numbers that brought such high pollution cannot be allowed. We support the fair and widely called-for frequent

flyer tax to deter people who fuel climate change, allowing each citizen one tax-free flight a year. But they would pay progressively higher taxes on each extra flight.

People in Luton South ward, and those under flight paths within a 15-mile radius, are badly affected by noise. Lack of sleep can have chronic health effects. Compensation for double glazing does not help in summer months when windows are open and people need to be outdoors.

Yours faithfully

Jeff Morgan

Jeff Morgan

On behalf of Friends of Wigmore Park

* Wigmore Valley Park is:
– a County Wildlife Site considered equivalent to a SSSI for its biodiversity and thousands of orchids
– an Asset of Community Value applied for by two neighbouring parish councils, Offley and Kings Walden, and registered by Luton Borough Council
– an Area of Local Landscape Value
– the recipient of a Fields in Trust award 2019 for one of the best parks in the East of England