For official use only (date received): 18/05/2022 17:46:41

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	PROFESSOR HARTLEY DEAN
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 seek hereby to confirm and elaborate my objection to London Luton Airport's application in 2021 to vary the planning Conditions 8 (limiting passenger numbers) and 10 (limiting noise and disturbance), which had been attached to Airport's most recent expansion phase; conditions that prior to the Coronavirus pandemic had already been flagrantly breached. The application seeks an expansion of passenger numbers to 19 mppa by 2024. It is premised on the dubious assumption that air travel will resume and continue to expand when the pandemic subsides, and in the context of an ambition eventually to expand passenger numbers to an environmentally unsustainable 32 mppa.

Noise: our personal experience

My home, where I have lived with my wife for 30 years, is at present and would under the proposals in this application continue by 2024 to be situated within the area enclosed by the 51dB summer daytime and the 45dB summer night-time noise contours. The levels of noise to which we have already been and will continue to be subject are detrimental to the quiet enjoyment of our home, particularly in the summer months when we might wish to open a window or sit out of doors and (because my wife has significant difficulty sleeping) at night.

Our experience during the past 30 years has been one of incremental increases in aircraft noise and disturbance caused by Westerly departures from LLA. The situation, notably from 2008 onwards and especially since 2013, had been continually worsening until the reduction in aircraft movements during caused by the pandemic in 2020. Even during the height of the pandemic, however, we have been troubled by Wizz Air passenger flights (which have continued throughout lockdowns) and sleep-disturbing night-time cargo flights. In recent months the volume of aircraft movements has been increasing incrementally.

An unnecessary and undesirable expansion

The continued expansion of LLA is economically foolish and morally irresponsible. Though LLA persistently maintains there is a need for continued expansion, air travel is not of itself a human need. In the case of human needs - for health or the means of livelihood, for example - it may serve incidentally as a 'needs satisfier' (see, for example, Dean, H., Understanding Human Need, 2nd edition, Bristol University Press, 2020), and only in exceptional circumstances can air transport serve as the best or the only means to satisfy human need. On that basis there is no conceivable need for LLA to expand. On the contrary, the needs of Luton, surrounding areas and indeed the planet would be better served in the longer term by its contraction or closure.

In the aftermath of the Covid-19 pandemic, demand for air travel is at best unlikely to return to previous levels, nor in the light of the climate emergency should it be allowed to do so. The prospects for the economy generally remain uncertain (see the World Bank's Economic Prospects report January 2022) and are now exacerbated by a cost of living and global energy crisis and the consequences of Putin's war in Ukraine. The damaging social and environmental effects of LLA's proposals, if implemented, are not properly manageable. Even if it were possible adequately to mitigate such effects, LLA has amply demonstrated that it is neither competent, nor can it be trusted, to do so. There is no sense in which the proposals enhance the local area. These are dinosaur proposals. They will undermine the prospects for regional prosperity. Rather than helping the region to adapt to the socio-economic realities of a post-Covid, zero-carbon world they will hold it back. Economic investment and technological innovation should be focused on facilitating new and better forms of virtual communication so as to moderate our reliance on all forms travel; and a whole spectrum of enhanced means and methods for the production, storage and distribution of zero-carbon energy.

Claims have repeatedly made by LLA that airport expansion will bring jobs to the local economy. However, historical evidence as to the actual effects observed at other airport expansion projects and other critical analyses, suggest that the additional FTE jobs directly created by each additional mppa

have in the past been significantly overestimated and are likely in practice to be in the low hundreds at best. (See Brendon Sewell's 2009 report, Airport Jobs: false hopes, cruel hoax). In the case of Luton, between 2011 and 2019 – when there was an increase from 9.5 to 18 mppa – according to estimates relied upon by the airport, direct employment increased from 8,250 to 10,900 or 312 jobs per mppa, around half the jobs per additional mppa that had been estimated by on behalf of LLA in 2012. Having regard to the quality of the jobs created by airport expansion (in terms of their sustainability, security of tenure, remuneration levels, job-stress and job-satisfaction) significant questions remain as to whether the majority of the jobs created by expansion would be of a kind that would be most appropriate in light of the long-term needs of the people of Luton. The evidence suggest that the pandemic has led to a downward shift in both employment and wage levels of staff working within aviation. Data from Oxford Economics demonstrate that higher paid staff at LLA do not live within Luton and Bedfordshire, while those workers who do have lower earnings typical of the area. There is little to suggest that the expansion of LLA will contribute anything to the government's 'levelling-up' agenda.

Successive reports by the Intergovernmental Committee on Climate Change and the agreed outcomes of the 2021 United Nations Climate Change Conference (COP26) leave little room for doubt that if air travel is to continue, let alone expand, at pre-pandemic levels, it must take radical steps to reduce its carbon emissions. However, there is as yet little evidence that effective technological solutions to this challenge can be realised in time to meet COP26 deadlines and still less evidence that mitigation measures proposed by LLA would be fully implemented. In addition to noise and carbon emissions, air traffic is a major contributor to a variety of emissions, including particulate emissions affecting air quality. There is extensive evidence from the World Health Organisation and Public Health England demonstrating the serious health effects of poor air quality, especially for vulnerable and disadvantaged people. Relevant morbidity and death rates – particularly in relation to vulnerable and minority population groups – have been shown to correlate with particulate emissions in proximity with aircraft take-offs and landings. And in this respect growing concern has recently been expressed regarding ultrafine particulate emission (see e.g. The Guardian, 11 February 2022). LLA's position is that the increase in air traffic resulting from current proposals will (subject to mitigation measures) give rise in an insignificant increase in particulate emissions, though this neglects the fact findings that according to LLA's own Environmental Impact Assessment Scoping Report of 2019 current levels for particulates (PM0.25 and PM10) appear already to be above WHO recommended limits (albeit within UK limits). There are, importantly, no data on ultrafine (PM0.1) emissions.

Public support

The report presented in support LLA's original application prepared by Wood Group UK upon the consultation process conducted by LLA does not give an adequate account of views that have already been expressed in opposition to the application. Though the report summarises the breadth of opinions expressed, in only one instance does it give a clear indication as to the relative strength and weight of such opinion. The exceptional instance is nevertheless revealing: in response to the question "Do you agree that the proposals will help to support regional prosperity and economic growth?" it appears from the crude bar chart presented that around 93 to 94% of respondents said "no". In the rest of this report the authors resort to vague assertions that "some" respondents argued one way while "others" argued the other, without giving any systematic account of numbers or proportion of consultees or which groups of consultees inclined to which opinions. This is not a rigorous or transparent report and though it discloses the range of views expressed by some affected stakeholders and communities, its probative value is limited, save for the one clear revelation that public opinion is massively weighted against LLA's claims that expansion offers prosperity and growth.

Conclusion

Further expansion of LLA can bring doubtful and at best only short-term economic advantages to the area and it can only hasten the impending climate emergency. To allow such expansion would be morally irresponsible. If further expansion is allowed to proceed, in 100 years from now and certainly by the end of the next century, though none of us will be here to see it, it may be foreseen that the empty shell of Luton Airport is likely to stand as a monument to the moral irresponsibility of those who repeatedly proposed, promoted or permitted its expansion.