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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	MR WILLIAM SELLICKS
Address	[redacted]
Company/Group/Organisation Name	Hitchin Forum

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

Hitchin Forum, a community group of over 100 members, opposes the attempt by Luton airport to increase the cap on its passenger numbers and relax noise conditions. The comments below are in addition to those already submitted via the Luton Planning portal.

In agreeing with the airport's plans, Luton Councillors accepted that the economic benefits, and particularly increases in job numbers, outweighed environmental considerations both locally and nationally. Whilst the Forum accepts that the airport has a positive impact on the local economy, there is evidence that job projections have been over-stated. For instance, in 2015, the airport commissioned a report from Oxford Economics1 which included some projections based on the then passenger cap of 18mppa. The report predicted that by 2030, when 18mppa was due to be achieved, the total of direct jobs (i.e. at the airport) would reach 13,100 whilst that for indirect jobs would be 131,000 nationwide. In 2019, when the airport actually handled 18m passengers, those totals were just 10,900 and 28,400 respectively. We believe that Councillors were too ready to accept the airport's argument based on job projections.

The health impacts of aircraft noise are under-researched but a number of bodies warn that they are profound. The World Health Organisation2 quotes research that indicates that 11% of the population will experience sleep disturbance at average levels of 40dB and above, suggesting that the UK's higher limits may be insufficiently cautious. There is evidence of a number of serious wider health related impacts, such as susceptibility to cardiovascular disease, cognitive development in children and mental health.

That growth in passenger numbers at Luton was greater than expected must have been obvious to airport managers as early as 2015, yet they did nothing to ensure that noise remained within the constraints imposed by the conditions to which they agreed in 2013. The annual Monitoring Report for 2015 gives the total number of passengers as close to 12.3m, whereas the prediction was 11.2m. The predictions were thought fit for purpose to the extent that they were included on display boards used in a consultation in the autumn of 2015 and they appeared on LBC's Planning Portal on 19th November of that year. There must have been a decision that the airport could cope with significantly more passengers and flights than it had originally thought was feasible. In doing so, airport managers must have realised that there would be consequences, one of which was that imposed noise conditions would be violated to the detriment of the health of those living under the flightpath.

The global pandemic, its subsequent economic consequences and now the war in Ukraine must mean that the assumptions underlying the airport's optimistic view of the increased proportion of quieter aircraft in carriers' fleets is highly questionable. There is therefore no guarantee that, should passenger numbers be allowed to increase, the airport will be any more successful in controlling noise than it was in 2017, 2018 and 2019.

Compared to other airports, Luton has a poor record in encouraging passengers to shift from private cars to public transport. A significant proportion of those private vehicles approach the airport using the A602/A505 corridor through Hitchin, in the process passing through both of Hitchin's Air Quality Management Areas, to say nothing of the additional noise impact of such vehicles very early in the morning. However, there continues to be no mention of any attempt to deal with this impact by the provision of public transport options through liaison with North Hertfordshire Council and public transport providers.

In terms of its global impact on climate change, Luton airport's ambitions have a negative and disproportionately large effect (compared with other airports) on UK carbon emissions, and on Luton Borough Council's local climate policy, because it specialises in short-haul flights and because of the inadequate surface access arrangements mentioned earlier. The International Council on Clean Transportation (ICCT) figures on departing flights show that UK aviation is the third highest carbon emitter (including in-flight emissions) in the world after the USA and China, and well above those of the fourth highest emitter, Japan3. The ICCT estimates that per passenger emissions from short-haul flights account for a third of all emissions from aviation.

In taking these, and numerous other factors, into account Hitchin Forum hopes that the Planning Inspectorate will reverse Luton Borough Council's damaging decision.

Bill Sellicks (Co-chair, Hitchin Forum)

References

1.The Economic Impact of London Luton Airport (Oxford Economics 2015)
https://www.london-luton.co.uk/LondonLuton/files/7e/7ec334b4-23ae-46
ad-b8a3-d46c53c4007a.pdf

2. The World Health Organisation (WHO)
ENVIRONMENTAL NOISE GUIDELINES for the European Region WHO 2018
https://www.euro.who.int/__data/assets/pdf_file/0008/383921/noise-gui
delines-eng.pdf

3. CO2 Emissions from Commercial Aviation. International Council on Clean Transportation
https://theicct.org/sites/default/files/publications/ICCT_CO2-commercl-avia
tion-2018_20190918.pdf