From: [redacted]
To: Dutton, Holly
Subject: RESPONSE: Call-In: London Luton Airport Operations Ltd [LLAOL] Applications 15/00950/VARCON & 21/00031/VARCON
Date: 06 May 2022 16:27:12

We summarise the HarpendenSky updated objection to the planning applications LLAOL 15/00950/VARCON & 21/00031/VARCON

[1] DLUHC Objectives For SoS Call-In
The Dept for Levelling-Up Housing & Communities [DLUHC] highlighted these points for the SOS to consider as the foundation for a planning decision.

Extract DLUHC letter 6April 2022: On the information so far available to the Secretary of State, the matters which he particularly wishes to be informed about for the purposes of his consideration of the application are:

a) The extent to which the proposed development is consistent with Government policies for meeting the challenge of climate change, flooding and coastal change (NPPF Chapter 14).

b) The extent to which the proposed development is consistent with Government policies for conserving and enhancing the natural environment (NPPF Chapter 15).

c) The extent to which the proposed development is consistent with the development plan for the area; and

d) any other matters the Inspector considers relevant.

[2] Climate Change Threats: The LLAOL planning application is totally inconsistent with central & local Government policies on climate change. In particular
[2a] Environment Act [EA] 2021: Air Quality Management: LLAOL flight operations currently emit 1.5m-2m tonnes of CO2 plus associated noxious gasses including NO2 & particulate matter PM2.5. This excludes the impact of related airport road traffic. 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 will be impossible to achieve with an expanding Luton Airport capacity on the borders between Bedfordshire & Hertfordshire. This is an example of LLAOL ignoring the EA2021 requirement for local collaboration on air quality management.

[2b] Risks To COP26 Outcome & Climate Change Committee Mandates: To achieve net zero by 2050 the COP26 participants agreed "*to advance ambitious actions to **reduce aviation CO2 emissions** at a rate consistent with efforts to limit the global average temperature increase to 1.5°C*". The CCC 6th Carbon Budget has been agreed [including aviation] committing the UK to an 80% reduction in GHG by 2035 now set in law. The LLAOL application for 19mppa will increase CO2 emissions by c50,000 tonnes [plus other GHGs] from c10,000 additional flights plus road

traffic putting both goals at high risk of default.

[2c] Increasing Local Population Mortality Risk: 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 & LBC has published a Climate Emergency . Luton Airport air & road traffic is the primary source of CO2, NO2 & PM2.5 emissions which will become worse with any further expansion. The current PM2.5 emission level is double the lowest in the UK. For example, according to the LBC Air Quality Annual Status Report *"LBC has identified two main areas where NO2 concentrations either are, or are likely to, exceed the annual mean objective level: along the length of the M1 Motorway & along the A505 (Dunstable Road) in part of Bury Park & the Town Centre. Both areas have been declared as Air Quality Management Areas (AQMA)".* To deal with the massive 1.5m to 2m tonnes of CO2, LBC plan to plant more trees [LBC AQASR] rather than tackle the source by reducing emissions.

[3] Increasing Road Traffic & Safety Risk: The already critical & rising GHG emissions levels along the M1 [LBC AQASR] highlight the traffic congestion problem which leads to vehicles diverting onto local roads where accident rates are rising, due in part to passengers attempting to catch flights. For example, Bim Afolami MP states "I am aware that residents continue to be concerned about road safety in Kinsbourne Green, particularly in light of a serious accident last week. I have raised resident concerns over this recent [A1081] incident with the County Council and I continue to work to try and secure a solution for residents in the village that will deliver improved road safety". Source: Bim Afolami MP April 2022. The LLAOL application does not account for the road traffic increases due to Hertfordshire Local Plans for population increase & development.

[4] Adverse Impact On Conserving & Enhancing The Natural Environment: The LLAOL application directly conflicts with MHCLG NPPF Chapter 15 item 174e which states: "*Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans".* The application will increase air pollution [as already described] from airtraffic & road traffic, & similarly repetitive noise pollution from an additional c10,000 flights per annum & planned changes in flight paths.

[5] CAA Planned Flight Path Changes: The CAA has initiated the Future Airspace Strategy Implementation South [FASI-S] which has caused LLAOL to design new airtraffic routs for Luton Airport arrivals & departures. The design options have been completed but the process has not yet entered the consulting phase which will decide the final routings. Therefore it is impossible for LLAOL to accurately define which routes will be implemented & the related noise & environmental impact on "conserving & enhancing the natural environment" other than it is clearly worse. Therefore this LLAOL application should be declined until a clear plan for the FASI-S routes is decided & successfully implemented.

[6] Expansion Business Case: There is no business case for Luton Airport expansion. All the south east airports [Heathrow, Stansted, Gatwick, London City] have excess capacity currently. For example, Heathrow does not anticipate full passenger recovery until at least 2026 according to data from Reuters but that is very uncertain bearing in mind the economic outlook & no

sound basis for investment. So this application is entirely unnecessary & should be dismissed until the outlook has sufficient clarity to enable the risks to be fully understood.

Thankyou for your consideration.

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