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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	PROFESSOR TONI GLADDING
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

To whom it may concern

I strongly oppose the expansion to 19 million passengers at Luton airport and the associated noise and environmental impacts. There are a number of reasons why I object, ranging from global climate change to local impacts on air quality, and finally how these proposals would affect me personally.

Global Impacts
Air travel is a significant contributor to global CO2 emissions. It seems that the whole of the argument the airport have forwarded is that local traffic is a larger contributor. However this seems to really miss the point, since much of the expansion planned is for optional travel for pleasure. In 2021 researchers at the University of Oxford determined that air travel has contributed 4% to human-induced global warming to date, and could contribute 0.1°C to global warming by 2050 (Klöwer et al 2021). This research clearly shows that without action to reduce flights, the sector will account for 17% of the remaining 0.3°C left in the 1.5°C temperature target, and 6% of the 0.8°C left to stay within 2°C. Airlines effectively add more to global warming than most countries. Indeed the same research concluded that due to other atmospheric impacts by aircraft emissions that the carbon footprint of aviation is between two and three times higher than a conventional carbon footprint.
The Government is committed to Net Zero greenhouse gas emissions by 2050 via the Climate Change Act 2008. Although this did not initially include aviation it is clear that global environmental change is impacted by it and it was recommended they are included by the Committee on Climate Change. This means the sixth carbon budget includes aviation (UK Government 2021). In this context it is ridiculous to sponsor the expansion of airports and air travel at a time when the impacts of climate change are becoming even more apparent, and global CO2 targets have been set to prevent climate change. If we are to cut carbon emissions by 78% of 1990 by 2035 and net zero by 2050, then the aviation sector must play its part. 'Greener fuels' and increased efficiency alone will not be sufficient, and would entirely be negated by massive expansions such as these.

Local Air Quality
In terms of local air quality a recent publication by Riley et al (2021) clearly show that in a systematic review of studies around airports that ultrafine particulate matter (PM2.5 and under) are at concentrations which can cause long-lasting and serious impacts on the health of those living and working in the vicinity. Other pollutants such as black carbon and polyaromatic hydrocarbons were also found to be at concentrations where health impacts could occur.
This is not the only publication to show these impacts, it is simply that this one reviewed over 3,000 articles representing many different airports and sizes, and concluded that airports do in fact impact the local air quality. Individual studies identify these issues many miles downwind.
Given the latest research on microplastics and tyres (Evangeliou et al 2020) I would also suggest the airport has not evaluated their local contribution to microplastics in the local (and potentially global) environment.
It is my opinion therefore the report submitted by Luton Airport evaluating these impacts is wholly inadequate.

Personal Impact
I have been woken several times in the night by noisy and inappropriately timed aircraft, and we are resigned as local residents to be regularly woken up around 6am on Mondays and Fridays which I assume are the busier times of the airport. On top of that we suffer during half-term, Easter and other holidays with being disturbed throughout the night and early wakening. Noise pollution is recognised to have a serious impact on health, including annoyance, sleep disturbances and even cardiovascular impacts (European Environment Agency 2020). This report emphasizes that aircraft noise is more annoying than road or rail noise. It is barely tolerable currently and I feel if it gets worse we may have to move as a result, no doubt at great personal cost as our property value will be impacted by the expansion. It is totally unfair for a commercial enterprise to benefit at the cost of local residents.

Given what I have outlined above, I believe the only course of action is for the Planning Inspectorate to reject this badly timed and badly stated planned expansion.

Yours sincerely

Prof. Toni Gladding
Professor of Environmental Health

References

European Environment Agency (2021) Environmental noise in Europe – 2020. No. 22/2019 ISSN 1977-8449 https://www.eea.europa.eu/publications/environmental-noise-in-europe
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eliou, N., Grythe, H., Klimont, Z. et al. Atmospheric transport is a major pathway of microplastics to remote regions. Nat Commun 11, 3381 (2020). https://doi.org/10.1038/s41467-020-17201-9
Karie Riley, Rich Cook, Edward Carr, Bryan Manning, (2021) A systematic review of the impact of commercial aircraft activity on air quality near airports. City and Environment Interactions. Volume 11, 100066, ISSN 2590-2520, https://doi.org/10.1016/j.cacint.2021.100066.
Klöwer et al 2021 Quantifying aviation's contribution to global warming. Environ. Res. Lett. 16 104027 https://iopscience.iop.org/article/10.1088/1748-9326/ac286e
UK Government (2021) UK enshrines new target in law to slash emissions by 78% by 2035. https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035