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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 MARTIN SHAW
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 must object to this application to increase passenger capacity to 19m passengers and to increase the noise contour limits as it is unnecessary. The Luton Airport ('LA') Master Plan itself says, in the 'Executive Summary', that LA do not expect passenger numbers to recover to the current limit of £18mppa until 2023. This is because the demand from customers to fly is not there at present, and nor is it expected to be there for at least the foreseeable future. Given the global pandemic, there can be no certainty at present on when passenger numbers will recover and to what extent; and given LA is currently operating well within its existing passenger limit there is no immediate need to grant this permission, and indeed there may never be such a need. Any forecast made in the present circumstances to support growth to 19mppa must surely be viewed sceptically – the global pandemic has simply made it impossible to produce credible passenger forecasts at present.

The Government has committed to 'Build Back Greener' in recovering from the pandemic and we should wait and see how this strategy develops before making any commitment to expand LA as such expansion would be contrary to this greener goal – given LA themselves say they are able to operate without restriction until 2023 there is no need to agree to an enhanced passenger limit, which will cause significant damage the environment, at this time. It is widely accepted that there is a 'climate emergency' so it seems crazy to agree to increased environmental damage for the future at a time when it simply isn't necessary to do so.

I find the arguments of economic benefit of the expansion, eg from jobs created, simply not proven. For the foreseeable future (at least 2023 on LA own admission) LA will be operating within its existing limits so approving the proposal will not create any additional benefits. Given the global pandemic, its uncertain whether LA will ever exceed 18mppa so the suggestion of economic benefit may never materialise. Without the economic benefit of expansion what good reason for approving the proposal is there?

Indeed, I would argue that there is significant damage in approving the proposal as it is giving the green light to further loss of amenity for residents through increased noise, congestion and pollution in a very broad area around the airport. I live in north St Albans, some way from the airport, but over the 5 years to March 2020 we have become increasingly blighted by the persistent aircraft noise, the congestion, particularly around the M1 junction 9-11 and on Thameslink, together with the pollution this has brought.

Further, I would note that under approved consents from 2013 LA did not anticipate LA reaching 18mppa until 2028. The reason for this was that reaching this limit went hand in hand with developments, such as quieter aircraft and redesigned airspace, that would reduce the loss of community amenity, for example by reducing the permitted noise contours. It is noticeable that LA was not able to remain within the criteria set in 2013, particularly in relation to the noise contours with it breaching the requirements in each of 2017-9. Knowing that LA was not able to operate at 18mppa without breaching the limits already in place to limit the loss of community amenity, it seems premature to grant an extension to 19mppa until LA has demonstrated it can operate within the limits agreed at 18mppa, if indeed LA ever sees a return to these passenger numbers.

For these reasons I believe the application should be rejected.

Please note that I have already submitted my comments to Luton Planning Portal and these comments should still stand.