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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

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|---|---|
| Appeal Reference | APP/B0230/V/22/3296455 |
| Application By | LONDON LUTON AIRPORT OPERATIONS LIMITED (LLAOL) |
| Site Address | London Luton Airport<br>Airport Way<br>Luton<br>LU2 9LY<br>Grid Ref Easting: 511908<br>Grid Ref Northing: 220942 |

### SENDER DETAILS

| | |
|---|---|
| Name | MRS JILL CROWDER |
| 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 strongly oppose these plans for a number of reasons including the following:
– they would have a very large environmental impact on the local area due to increased noise particularly at night without effective mitigation
– they would cause a significant increase in journeys to and from the airport by passengers and commercial vehicles without the road capacity to support it, particularly east/west
– they would encourage increased aviation emissions at a time when experts have warned that emissions should be reduced due to global warming

The Draft Need Case does not accurately reflect the post-Brexit, post-COVID economic situation, and current events show that significant changes in oil and energy prices and inflation rates are happening during the consultation. The Case relies too heavily on long-term forecasts which have been made at a time of great change and it would be prudent to wait until government forecasts for the UK economy are updated to take account of all these changes, including the commitment to achieve net zero.

Businesses already do a lot more video-calling, and people are aware of the need to fly less to reduce their carbon footprint. The Oxford/Cambridge Arc has not proved to be an economic powerhouse, and "levelling up" does not mean economic expansion of London's airports. Luton Borough Council received a large COVID grant from the government, a condition of which was to reduce financial dependence on the airport. This proposal would increase that dependence.

The decision-making on this project has largely been done in secret, so it has not been subject to full public scrutiny or accountability. The response to the non-statutory consultation indicated that in almost every category the majority of people said they did not want further expansion of the airport and are concerned about noise. It does not appear that there is any open and transparent accountability for the £60 million of public money which has been spent on the preparations for a Development Consent Order application – money that could have been invested more directly and with less risk in alleviating poverty in Luton and building a more diverse and robust local economy.

It would be more resilient and responsible to focus jobs, skills and training on creating a more a diverse economy in Luton and the surrounding area based on truly sustainable technologies, rather than claiming that airport expansion which adds 60% more flights and 40,000 more passenger journeys per day is somehow sustainable for the long term. Training and skills-development in the areas of emissions reduction for local homes, more efficient batteries for cars and commercial vehicles, and better uptake of renewable energy would be more beneficial to the students of today.

We do not have certainty on the transport strategy, particularly in relation to the lack of east/west connectivity. Access to and from the airport via the Lower Luton Road and the A1081 became very difficult in 2019 even at 18 million passengers, but there is no credible reason to expect a substantial shift to using public transport. The whole process appears to have been rushed and the actual surface transport issues, rat-runs and fly-parking appear to have been ignored.

Passenger numbers are not under the direct control of Luton Rising, and long term demand forecasts are unreliable.

The proposed development would be significantly damaging to the environment, local quality of life and well-being in ways which
are not justified by the Draft Need Case nor offset by the proposed mitigations.

The noise impacts would put even more people into the "adversely affected" category. Numbers of flights would increase significantly, starting at 5am and running on until the small hours, with 70% more flights between 11pm – 7am. Noise disturbance at night is known to harm health, and the flight paths when at their noisiest closest to the airport cannot avoid local communities such as Caddington, Slip End, South Luton, Breachwood Green, St Paul's Walden, and Stevenage. These impacts are not mitigated by offers of noise insulation to those closest. Noise from the flights affects a wide area, and departing aircraft are often held low as far as Welwyn due to out of date airspace.

Adding more flights would add significantly more carbon emissions to the national budget, and every airport expansion takes the overall carbon emissions in the wrong direction.
The results of the Jet Zero consultation have not been published and the proposals for new technology such as electric planes and zero emissions flight are not yet proven,
let alone having definite timescales for introduction by Luton Airport's low cost airlines.

Latest reports from the Committee on Climate Change and Intergovernmental Panel on Climate Change recommend reductions in aviation growth as part of achieving net zero and keeping global temperature rise to 1.5 degrees, which is an overriding imperative. Luton Rising proposes Luton aviation capacity growth of 78% between 2025 and 2043 which does not demonstrate "Green Controlled Growth". The proposals simply mean that when particular thresholds set by Luton Rising have been achieved, further development to facilitate further growth would occur. Since the thresholds are defined by Luton Rising, there is no independent control, and since the amount of growth proposed is very much larger than the advice from Climate Change experts, it should not be labelled "Green" in any way.

Genuinely putting the community first would mean listening to the non statutory consultation response, in which people overwhelmingly rejected these proposals for significant further expansion of Luton Airport. The Community First scheme can continue to operate without any need to expand the airport. In 2019 the concession fees were £55 million, sufficient to make a substantial contribution to the Community First scheme as well as providing for charitable services in Luton.

Luton Airport paints a very one-sided picture in favour of the expansion proposals, and the true impacts are hidden from the public.