Reference: APP/B0230/V/22/3296455
Appellant/Applicant
London Luton Airport Operations Limited (LLAOL)
Agent
Wood Group
Site Address
London Luton Airport
Airport Way
Luton
LU2 9LY

This response is provided by Phil Waters, Chairman, on behalf of nearly 1,000 members of The Harpenden Society (the Civic Society for the town of Harpenden). The Harpenden Society (the Society) seeks to promote the maintenance of and enhancement of the quality of life in the town of Harpenden.

The Society objected to the original planning application by London Luton Airport Operations Limited (Luton Borough Council reference 21/00031/VARCON) to grow passenger numbers to 19 million passengers per annum and relax a number of conditions attached to Planning Permission 15/00590/VARCON. We continue to object to the application.

The principal reason for our continuing objection is that the application fails to achieve the necessary balance between further capacity growth and its environmental impacts.

Benefits of aviation

The application does not justify the need for capacity growth exceeding the 18 million passengers per annum (mppa) currently permitted, neither does it justify the need to set aside the balancing controls which would ensure mitigation in step with growth. The planning officer's report states that growth will safeguard and sustain existing local jobs, but these jobs will be safeguarded and sustained as the airport recovers post-Covid. The Local Plan requires noise to be limited, and the expectation is – and remains – that less noisy aircraft will and should enable that to happen by the 2028 horizon of the existing planning permission.

There are no specific benefits articulated as arising from granting this planning application, but there would be increased environmental impacts, and increased noise would affect many additional households.

Greenhouse gases and air quality

CO_2 and other noxious gas emissions will grow substantially and the applicant offers no mitigation to offset the growth of either surface access or aircraft CO_2 or noxious gas emissions. In the case of the former, this growth runs contrary to Luton Borough Council's local plan which has as strategic objective 6 "to reduce…environmental deprivation". Furthermore, Luton Borough Council and all Councils surrounding Luton Borough Council have all declared a Climate Emergency and set goals for achieving carbon neutrality between now and 2040. Growing CO_2 at Luton Airport will make those targets unachievable. Also, the government has stated (via the 6th Carbon Budget) that aircraft emissions need to fall by 40% between now and 2050. Permitting growth now would make that target harder to achieve.

In addition, the applicant has made no effort to take account of the Environment Act 2021, Part 4 section 72 which refers to Schedule 11 which contains amendments of Part 4 of the Environment Act 1995 (air quality) and requires Luton Borough Council to cooperate with neighbouring authorities to improve air quality.

Noise

This application will increase the noise disturbance suffered by neighbouring communities by varying Condition 10 of planning permission 15/00950/VARCON. This is contrary to Aviation Policy which requires the (negative) environmental impacts of aviation to be reduced if growth is to be permitted. Condition 10 was imposed to mitigate the negative effects of the earlier planning permission which enabled the airport to grow to 18 million passengers per annum. It would not be balanced to relax this Condition AND allow further growth. Furthermore, Luton Borough Council's Local Plan policy LLP6 will only support airport growth where it meets six objectives relating to noise, which, in summary, require noise impacts to be reduced over time (and be properly mitigated in the meantime). The applicant has not met the objectives set out in this local plan policy.

In summary, this application seeks to undermine the requirement for balanced growth and mitigation and should be refused by the Planning Inspectorate. It evidences no benefits, either economic or environmental, but would impose a considerable cost on the local environment from increased noxious gases and noise and, for the UK as a whole, will make the achievement of our CO_2 reduction targets more challenging and burdensome on the whole population. In addition, we heartily endorse the objections raised by Hertfordshire County Council and LADACAN.