

Luton Airport Inquiry [GATELEY-GHAM.FID70474]

**Statement to Planning Inspectorate ref.
21/00031/VARCON**

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Introduction

Please understand that I am not here to oppose to the airport - only to decry what I consider to be its mismanagement. For that I hold Luton Borough Council (LBC) and Luton Rising (formerly LLAL) fully responsible. To a lesser extent I blame the Airport Operator (LLAOL) who have acted in ruthless pursuit of the best interests of their shareholders but without obvious regard to the consequences.

Note that I have strenuously objected formally to Planning Application 21/00031/VARCON to increase LTN passenger numbers from 18mppa to 19mppa.

Personal Impact

We have lived in Wigmore since 1994 and experienced first hand the massive increase in noise resulting from accelerated airport expansion. Excluding the period of the Covid pandemic we could not relax in our back garden because of constant airport noise, nor get a guaranteed full night's sleep due to late departures and arrivals.

Prior to the Covid epidemic, flights were starting at 05:30 each morning, particularly to eastern Europe. (We know this because we had occasion to be at the airport and noted the departure times and destinations.)

Night-time disruption seems to be centred around planes that are slow and noisy.

We sometimes experience what I can only describe as fuel 'dumping'. A highly volatile gas permeates the air and leaves a nasty smell and taste in the mouth. No doubt due to its volatile nature it is also harmful when breathed in. I have mentioned this to several representatives particularly during consultations on increasing capacity and each time the answer is "Oh we would never do that!". My question is - what other source can there be?

To increase passenger throughput further would be to make our lives even more miserable.

The current Planning Conditions were agreed when permission 12/1400/FUL was granted (including later amendments). Conditions were attached to give residents certainty about emissions, noise, economic benefits and to protect residential amenity; numbers of passengers and flights would steadily increase in line with LLAOL's promises of balancing impacts such as noise and pollution by mitigation. Conditions, especially related to noise, have been breached primarily because LLAOL has been driven by Luton Rising to expand too quickly and generally in advance of anticipated improvements to aircraft fleet performance – over which the airport has no control.

As a direct result, night noise exceeded the legal limits set by the Section 106 Agreement signed by the LLAOL and LBC.

Many research studies, (for example: "Aircraft noise and public health the evidence is loud and clear" by the Airport Environment Federation -AEF- dated 2016) have concluded that aircraft noise at night is directly harmful to health.

In addition to the noise there is also the issue of health damage we are incurring due to carbon and aerosol emissions and which materialise into chronic illnesses or even death.

Claimed jobs have not materialised either despite massive investment.

Airport Expansion

If it is felt that I am describing the impact of airport expansion in some melodramatic, empirical fashion, the figures below speak for themselves.

LTN has expanded at a dizzying rate compared to other UK airports of a similar size. For comparison I have selected London Gatwick (LGW), London Stansted (STN), and, for balance, two airports outside of the South East, Manchester (MAN) and Birmingham (BHX).

The data are based on CAA annual reports which are publicly available and presented as a series of Tables that include all UK commercial airports:

- Table 1 provides annual passenger data per annum “Size of Reporting Airports 20xx”;
- Table 3.1 provide air traffic movements per annum “Aircraft Movements 20xx” where “xx” is the year in question.

For simplicity I have collated Table 1 and Table 3.1 for each of the years 2013 through 2019 into a separate document “CAA data 2013-2019 Pax and ATMs.pdf”. As explanation of terms and abbreviations I have headed the document with the foreword from the 2019 CAA report.

In addition all of the tables and graphs below, and others relating to comparison airports, have been incorporated into a separate document “Passenger and ATM increases since 2013 by Selected Airport.pdf”.

Passenger (Pax) Numbers Increase

The following Table 1 shows the relative increase in Pax per airport from 2013-2019.

	LGW	STN	LTN	MAN	BHX
2013	0.0	0.0	0.0	0.0	0.0
2014	7.5	11.8	8.1	6.1	6.4
2015	13.6	26.1	26.5	11.7	11.7
2016	21.7	36.2	51.1	23.8	27.7
2017	28.6	45.1	64.9	34.3	42.4
2018	30.1	56.8	73.0	36.6	36.7
2019	31.5	57.6	87.9	42.0	38.8

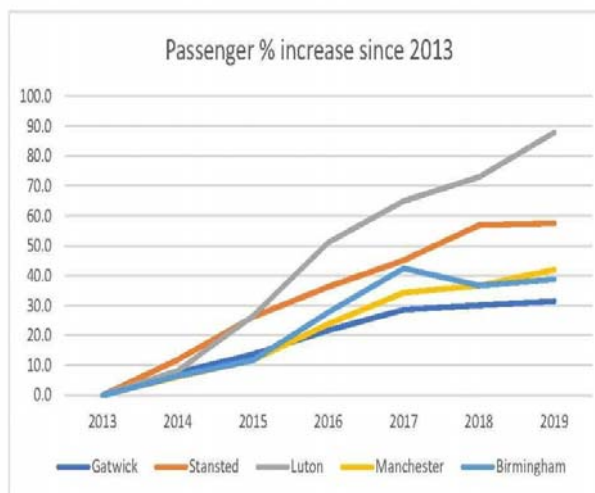


Table 1: Relative Passenger growth by airport (%)

Graph of Table 1

Passenger numbers for LTN have increased by a staggering **87.9%** over the **six-year** period compared with the nearest rival STN, reaching 57.6%. The other airports demonstrate more modest increases.

Each additional passenger represents someone who had to get to or leave from the airport, and whilst they were in the terminal had to be heated, lit, fed and waste disposed of. Journeys to or from LTN produce carbon compounds and other aerosols from combustion engines. Train passengers also add to the general pollution but since the electricity for the train is generated elsewhere, quite often by burning non-renewables, the problem is ‘relocated’.

Air Traffic Movements Increase

The following Table 2 shows the relative increase in ATMs per airport from 2013-2019.

Note that the 'ATM' figure used for calculations is the 'Grand_total' figure from the relevant CAA Table 3.1.

	LGW	STN	LTN	MAN	BHX
2013	0.0	0.0	0.0	0.0	0.0
2014	3.8	7.4	6.5	0.7	1.7
2015	6.9	15.2	19.1	2.2	2.4
2016	12.0	23.3	34.2	13.4	18.3
2017	14.1	29.8	39.7	20.2	27.5
2018	13.3	37.8	42.6	18.7	16.8
2019	13.8	36.6	48.1	19.7	14.3

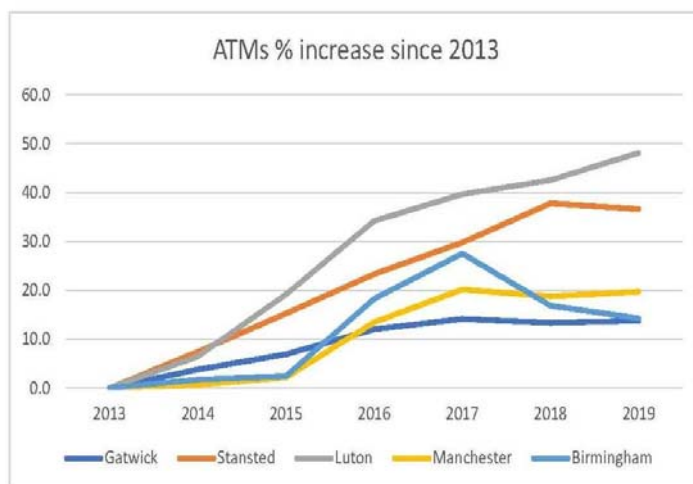


Table 2: Relative ATM Growth by airport (%)

Graph of Table 2

ATMs for LTN have increased by a staggering **48.1%** over the **six-year** period compared with the nearest rival STN, reaching 36.6%. The other airports demonstrate more modest increases.

Each additional ATM represents noise either from take-off, landing, idling or taxiing. Each ATM produces carbon compounds and other aerosols from jet engines, burnt rubber from touchdown, etc. Each Take-off ATM has to be serviced by a fuel bowser from the local storage facility but this has to be topped up continuously by a fleet of diesel tankers as it is not fed from the national pipe network.

Passengers per ATM Increase

The following Table 3 shows the relative increase in Pax per ATM per airport from 2013-2019. This is an indication of: more passengers per ATM, larger aircraft usage, or both.

	LGW	STN	LTN	MAN	BHX
2013	0.0	0.0	0.0	0.0	0.0
2014	3.6	4.1	1.6	5.4	4.6
2015	6.3	9.4	6.2	9.3	9.1
2016	8.6	10.5	12.6	9.1	8.0
2017	12.7	11.8	18.1	11.8	11.7
2018	14.8	13.8	21.3	15.1	17.0
2019	15.6	15.3	26.8	18.6	21.4

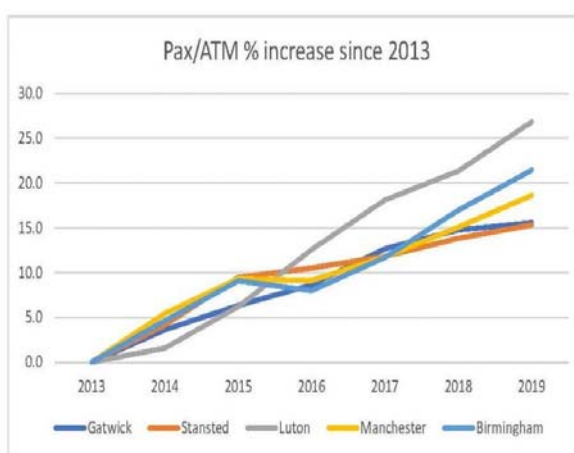


Table 3: Relative Growth in Pax per ATM by airport

Graph of Table 3

ATMs for LTN have increased by 26.8% over the six-year period compared with the nearest rival BHX, reaching 21.4%. The other airports demonstrate more modest increases.

Bearing in mind that the Pax numbers of 18mppa were not supposed to be reached until **2027/28** when the aircraft fleet should be more modern, with more efficient and quieter engines, this growth represents generally more noise per ATM and more emissions per ATM as a consequence of passenger loading.

Actual Figures for Pax and ATMs for LTN from 2013 to 2019

The following Table 4 shows the numbers of Pax per annum as well as ATMs from 2013-2019. (Note: 'mppa' refers to millions of passengers per annum)

LTN	Pax	ATM
2013	9,693,487	95,763
2014	10,481,501	101,950
2015	12,262,581	114,083
2016	14,642,282	128,519
2017	15,989,225	133,743
2018	16,766,552	136,511
2019	18,213,901	141,858

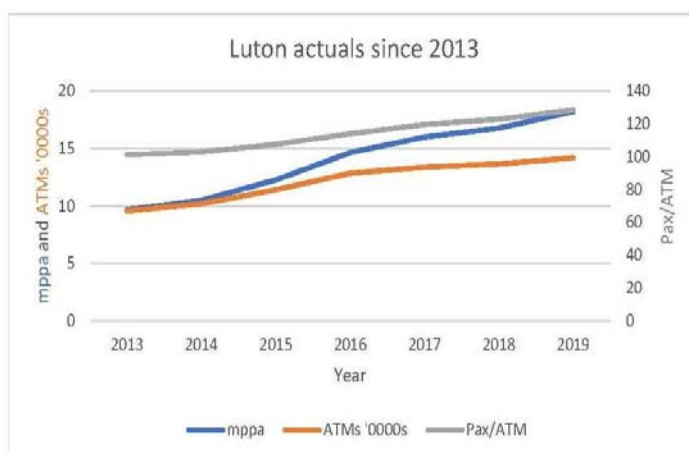


Table 4: Actual Numbers of Pax and ATM for LTN

Graph of Table 4

It is time for LTN to stop this acceleration and meet its obligations not only under the DCO but also under LBCs own Local Plan, COP26, and the Climate Change Emergency, among others.

Carbon Calculations

We are currently living in a world that is allegedly under threat from a Climate Crisis, with governments signing up to a Net Zero policy, yet LLAOL is committed to an allegedly 'negligible' yet actual increase in carbon emissions both from additional ATMs and vehicular journeys (there will be approximately 4% more traffic pollution in the AM and PM rush hours for example).

LLAOL have been very busy for years ensuring they build up additional passenger capacity. Permanent construction works have taken place: new stands, multi-storey parking; access road widening, taxiways, to name but a few.

Not forgetting of course, the DART, which is a Luton Rising project.

I am not aware that any of these construction works have been included in the calculations of carbon footprint. LLAOL only seem to make allowance for mitigation of greenhouse gases (GHGs) and other emissions relevant to Operations, not construction.

Impact of Set-Down and Pick-Up charges.

As far as I can recall LTN was the first airport to introduce these charges, and now others follow suit. These charges are extortionate, as are short-term parking fees. Although there are cheaper off-airport parking facilities, some inconsiderate drivers leave their vehicles in residential streets whilst they go on holiday. Others, rather than pay the waiting charges, park haphazardly on pavements, causing nuisance to pedestrian traffic.

This is causing a dangerous situation at the roundabout with Percival Way and New Airport Way. Vehicles are queueing up to await foot passengers who want to escape the Set-down and Pick-up charges and this spills back onto the roundabout making it necessary to overtake into the oncoming lane.

A further increase in airport parking demand from additional passengers, coupled with an inevitable increase in charges to deter private car use and encourage modal shift, will only result in more inconsiderate and potentially dangerous practices.

LBC and Luton Rising Ignore their own Obligations

More residents that ever will be subject to night-time and day-time noise, and the proposals state that the LBC plan to be Carbon Neutral by 2040 is only an 'aim', not a 'Policy'.

Instead of an expected steady decline in impacts (noise, air quality, health traffic etc.) there will be an increase. However the proposals state that these will be negligible (with the exception of Health, impacts which will be of which will be of 'moderate significance' !.).

There is no mention of the cost of living crisis either. Luton Airport is a low-cost carrier hub. The doyen of low-cost carriers, Ryanair's Michael O'Leary, has recently stated that the era of dirt-cheap flights has ended. Taken together with the cost of living crisis what modelling have LLAOL carried out to justify the increase in passenger numbers ?

What is their risk assessment of the impact of additional fuel costs (in dollars) or the imposition of VAT on aviation fuel ?

We are Not Listened to

Our biggest frustration is the sense that nobody at LBC, Luton Rising, or LLAOL are listening. They release various documents for comment through the Planning portal or through 'Consultations', the vast majority of responses object with detailed comments (whereas the minority who support generally have a one-line response). Yet LBC seem to gaily ignore opposition and rubber stamp their original plan anyway – as they have done in this instance. What is the point of such 'consultations' - just to tick a box ?

This attitude is surely a factor in the apathy that now seems to surround any airport-related issues.

LBC and Luton Rising ignore the local population

- It is a stated objective of LBC to increase throughput at LTN to 32mppa as a minimum. They have already held one lot of consultations which received generally negative responses, but are determined to submit further proposals. The proposal to increase from 18mppa to 19mppa is just a Trojan Horse for further expansion.
- How else can they justify the DART which cost over £250 million yet replaces a fleet of bendy buses provided free by Thameslink. ? A business case for the DART has never been published.
- LBC has off-loaded Wigmore Valley Park to Luton Rising against the wishes of the local population. Why was this done if not to provide the additional land required for their further expansion proposals ?
- Irrespective of the outcome of this enquiry Luton Rising seem hell-bent on constructing a new peripheral road for an approximate cost of £100m. Where will it terminate – a second terminal or New Century Park ? – take your pick.
- LBC have run up a debt mountain, totalling hundreds of millions of pounds, much of which has gone in the direction of LTN in the form of high-interest loans. There are no published plans to repay this capital. so the debt risk lies with the people of Luton. The jobs which were supposed to be created by these massive investments have not materialised.

Conclusion

LBC and their subsidiary Luton Rising, and LLAOL, cannot be trusted. They should not be allowed to increase passenger numbers and must be made to abide by the original agreed conditions. ALL of their future proposals must be the subject of independent scrutiny by the Secretary of State.

Unfortunately given the limited time available to me at this enquiry I have had to reduce or even omit, a lot of detailed comment.