

Future Luton
LLAL

19th November 2019

RE; Statutory Consultation on Future Luton

Dear Sir,

Hitchin Forum strongly opposes London Luton Airport Ltd's (LLAL's) proposals to increase capacity to allow passenger numbers to rise to 32 million passengers per annum (mppa) by 2037. This letter outlines the main reasons for our opposition. Pages 3-7 supply more detailed supporting arguments and references.

1. LLAL justifies its proposals in terms of the **economic benefit** it brings to Luton and to the region. The recent letter from Lord Deben, Chair of the Committee on Climate Change, to the Secretary of State for Transport states 'investments will need to be demonstrated to make economic sense in a net-zero world and the transition towards it.' In its expansion plans, it is clear that the airport has failed to assess the risk to its assets and to the region in a climate of rising public concern about emissions and likely increasing legislative hostility. The fundamental assumption that demand will continue on its upward trend indefinitely is naïve, irresponsible and unsustainable.

2. The plans ignore the cost of **increasing carbon emissions** from flights (about 80% of total) whilst providing mitigations against the comparatively small proportion of emissions resulting from ground operations. LLAL admits that it has no control over the emissions from flights. To attempt to increase passenger numbers to 32mppa (an increase of 78%) is unacceptable. Lord Deben's recommendation is that demand growth is capped at 25% above current levels.

3. In its approach to **aircraft noise**, LLAL has demonstrated that it has pursued a policy of unrestrained demand-led growth, which fails to prioritise the health and quality of life of its immediate neighbours, and is increasingly impacting the residents of towns like Hitchin. The consequence of the airport's failure to adhere to its original timetable for expansion, with passenger numbers reaching a peak of 18mppa 10 years ahead of schedule, has meant that it has applied to relax a key noise condition until 2024. Research into the health impact of noise has led the World Health Organisation to advocate lowering the levels at which adverse effects are regarded as significant. LLAL's proposals rely on outdated noise policies which are likely to be tightened during their lifetime, posing an additional constraint on airport activity.

4. **Air Quality.** Over 10% of passengers and employees access the airport from the east via the A602/A505 corridor through Hitchin using private cars. The route passes through both of Hitchin's Air Quality Management Areas. The proposals make no mention of public transport solutions to alleviate this problem.

5. **Conclusion** LLAL's proposals risk locking Luton and the surrounding area into an economically unhealthy dependence on the fortunes of the airport in advance of a likely changing policy background towards airport expansion. They will substantially increase carbon emissions and negatively impact on the health and quality of life of the airport's neighbours.

Hitchin Forum believes that expansion should only be allowed when there is hard evidence that the airport's activities demonstrate sustained and verifiable lowering of its impacts on carbon emissions, noise from flights and local congestion.

Yours sincerely,

A handwritten signature in black ink that reads "W. S. Sellicks". The signature is written in a cursive style with a large initial 'W'.

Bill Sellicks
Co-chair,
Hitchin Forum

About Hitchin Forum

Hitchin Forum is a community organisation with over 120 members. Most are individuals, but the total includes a number of businesses and other organisations. The Forum opposed the expansion plans (which were finally approved in 2014) on the grounds that noise mitigation measures were not robust and that the transport assessment underestimated the impact of increased airport traffic on roads in Hitchin and especially in the Stevenage Road Air Quality Management Area.

Supporting arguments

1. Risks to long term investment

1.1. Is the assumption of passenger number growth justified?

In his letter to the Secretary of State for Transport of 24th September 2019¹, Lord Deben makes it clear that to achieve the target of net zero carbon emissions by 2050, international aviation must be included. In a detailed annex to the letter, a number of ways in which emissions from aviation could be reduced are listed, including managing demand by carbon pricing, frequent flier levies and removing the tax advantages on fuel currently enjoyed by aviation. Combined with advances in alternative fuels, improvements in engine and airframe technology, the overall effect would be to end the era of cheap flights which has led to the increase in demand which has allowed Luton to expand so rapidly in recent years. That rate of expansion is assumed to continue throughout the period covered by the proposals. Lord Deben's intervention alone is significant, not only in its content, but in its timing, since it comes during a period where climate change and its link to anthropogenic carbon emissions has risen up the political agenda. Public awareness of the issues is increasing and it is now an issue in the election campaign in a way not seen before.

1.2. Could the airport become a 'stranded asset' and what would be the consequences?

In a recent presentation to 'Net zero 2050' a climate conference organised by Hitchin and Harpenden MP, Bim Afolami, Dr Ben Caldicott² talked about Stranded Assets - 'assets that have suffered from unanticipated or premature write-downs, devaluations or conversion to liabilities'. Directors and managers in organisations that are faced with such problems often exhibit 'loss aversion' – a 'well-documented behavioural tendency to continue with activities already invested in even if such activities are not economically rational'. The adherence to a policy of demand-led expansion, whilst ignoring the warning signs (which include mounting evidence that the current level of expansion cannot be sustained) seems a classic example of the tendency to this type of behaviour.

If the expanded airport becomes a 'stranded asset' the consequences will be devastating, not just for those managers who have to take responsibility, and shareholders, but sadly for those whose livelihoods depend on the continued financial success of the airport.

2. Carbon emissions

2.1. Government Policy on Airport Expansion

We believe, along with Lord Deben, that government policy on airport expansion needs to be re-visited in the light of the overwhelming scientific consensus on carbon emissions and climate change. Climate change did not form part of our objection in 2013 because local and national planning regulations did not accord it significant priority. Until airport expansion policy is revised to take account of the net zero 2050 target, we regard the continued proposals for demand-led expansion as environmentally irresponsible. Equally irresponsible is the suggestion that failure to expand will result in economic damage to the area. If expansion is permitted, and government is subsequently forced to impose draconian controls as the climate crisis worsens, the negative economic impact will be far more serious.

2.2. Is Luton's proposed expansion compatible with net zero 2050?

In his letter¹ to the Secretary of State, Lord Deben advocates that airport capacity growth should be limited to, at most, 25% above current levels, and urges government to revisit its airport capacity strategy in the light of this recommendation. An increase from 18mppa to 32mppa is 78%. If, as Lord Deben makes clear, 'investments will need to be demonstrated to make economic sense in a net-zero world and the transition towards it', such expansion will be shown to be both economically and environmentally unsustainable.

2.3. What mitigation is LLAL currently offering and how effective will it be?

LLAL acknowledges that the main source of greenhouse gases (GHG) from an expanded airport would be from flights³. The only emissions on which LLAL is able to have any direct impact are under the heading of 'airport operations'. The figures supplied⁴ give details of the predicted GHG emissions. In all scenarios the contribution from flights is of the order of 80% of total. The predicted increase in emissions from flights over the period 2020-2039 is 1.03MtCO₂ to 1.64MtCO₂ – 59%, and this does not include non-carbon GHG emissions. The PEIR⁵ identifies a number of 'embedded mitigations' aimed at air traffic movements. One group of these addresses aircraft movements on the ground, and as such will have little impact on emissions from engines during landing and take-off. The other group is dependent on LLAOL being able to incentivise operators to use more sustainable fuels. It is by no means guaranteed that this approach would be effective, especially since the take-up of sustainable fuels has not been as rapid as expected.

3. Aircraft noise

3.1. What is the airport's record on aircraft noise?

The airport's Annual Monitoring Reports are showing increased numbers of complaints from Hitchin residents (2012; 21 complaints, 2018; approximately 70 complaints). However, Hitchin Forum recognises that noise impacts are far greater for those living closer to the airport, and supports the efforts of groups such as LADACAN which campaign to control and reduce this. In its approach to noise, the airport has repeatedly demonstrated that the impact on the health and quality of life of its immediate neighbours is of secondary importance to what it regards as the imperatives of demand-led growth. It has pursued this policy to the extent that it is aggressively trying to relax noise condition 10 until 2024 – its breach of which is a direct consequence of allowing passenger numbers to grow faster than it predicted - so that the capacity of 18mppa is about to be exceeded 10 years before it was due to be reached.

3.2. Will the expansion proposals have an impact on health?

LLAL⁶ admits 'there is a strong link between aircraft noise and health, with long-term exposure to higher levels of noise being associated with adverse health outcomes', and gives examples – 'sleep disturbance, dementia, stroke amenity/annoyance, acute myocardial infarction (AMI), hypertension and ischemic heart disease'. Although still in its infancy, research findings on the health impacts of aircraft noise have prompted the World Health Organisation, in its most recent guidelines⁷, to strongly urge governments to reduce daytime noise levels produced by aircraft to below 45 dB L_{den} and night time to below 40 dB L_{night}. These limits are significantly below those currently regarded as harmful in the UK. LLAL estimate the population within the 51dBA daytime noise contour as 56,800⁸ and during the night within the 45dBA contour as 30,900⁹.

Those numbers are already large, but if the evidence for the WHO recommendations becomes stronger, it seems that LLAL is prepared to risk the health and quality of life of an even higher number of people as they are exposed to potentially damaging noise over the lifetime of the project.

A responsible approach would be for LLAL to recognise that legislation to address aircraft noise will be a likely consequence of further research. Growth should be restrained, with marginal increases conditional on the prior achievement of year-on-year reductions of noise.

3.3. The consequence to LLAL of demand-led growth on noise

Unrestrained demand-led growth risks exposing the airport to future legal battles as the evidence for a causative relationship between aircraft noise and health strengthens.

4.Surface access along the A602/A505 corridor in Hitchin

In terms of surface access, during the period 2013 to the present, it is reasonable to suppose that both morning and afternoon peak time traffic levels along the A602-A505 corridor through Hitchin has been higher than would have been the case had the current phase of expansion not gone ahead. There were bland assurances that this would not occur in the Transport Assessment¹⁰ which supported the planning application submitted in 2013. According to that Transport Assessment, approximately 12.5% of airport-related journeys are along the A602 / A505 corridor through Hitchin¹¹. Little progress was made until 2018 in the improvement of air quality at the Stevenage Road Air Quality Management Area which was declared in 2012. In 2016, a second AQMA was declared along this corridor in the vicinity of the Hitchin library roundabout at the junction of the A602 and A505. No provisions to improve access arrangements through Hitchin were made at the time – it seems that the airport’s efforts were only directed towards improving public transport access from the west. The current proposals include minor adjustments to lanes at roundabouts in Hitchin, which may improve flow, but will have no impact on numbers. Once again, there are no proposals to improve public transport options for those approaching the airport through Hitchin.

5.Conclusion

LLAL justifies its expansion plans by its contribution to the local and national economy. Significant environmental and health impacts of aviation do not currently appear on any balance sheet. They are real; both global and local and, most importantly, negative. If a DCO is obtained, and demand-led expansion is allowed to continue, we suggest that any apparent economic benefit will be achieved at an unacceptable cost to the environment and the health and quality of life of an increasing number of local residents.

Government policy is likely to evolve in the light of the almost unanimous scientific consensus on climate change, pressure from an increasingly vocal public and the developing body of evidence on health impacts of aircraft noise. The risk that LLAL’s business model will become unsustainable will increase over the lifetime of the project, with serious consequences for the airport, its employees and the economy of the area.

Given these risks, we believe it is irresponsible of LLAL to pursue its policy of demand-led expansion.

See over (p7) for references

References

1. Letter from Lord Deben to Grant Shapps
<https://www.theccc.org.uk/wp-content/uploads/2019/09/Letter-from-Lord-Deben-to-Grant-Shapps-IAS.pdf>
2. 'Stranded Assets and Their Implications' Dr Ben Caldecott. Director, Oxford Sustainable Finance Programme & Associate Professor Smith School of Enterprise and the Environment
University of Oxford
3. LLAL's Guide to Statutory Consultation page 113
4. Provisional Environmental Information Report (PEIR) Volume 1: Main report, tables 8.6.21 and 8.8.15
5. Provisional Environmental Information Report (PEIR) Volume 1: Main report, table 8-13
6. Provisional Environmental Information Report (PEIR) Volume 1: Main report, para 14.8.46 and table 14.15
7. Environmental Noise Guidelines for the European Area Executive Summary (WHO 2018)
Table 8.1

http://www.euro.who.int/_data/assets/pdf_file/0009/383922/noise-guidelines-exec-sum-eng.pdf?ua=1

8. Provisional Environmental Information Report (PEIR) Volume 1: Main report, table 9-21
9. Provisional Environmental Information Report (PEIR) Volume 1: Main report, table 9-23
10. London's Local Airport - Planning Application Transport Assessment (URS November 2012) Table 83 Paras 14.7.7 and 14.7.8
11. London's Local Airport - Planning Application Transport Assessment (URS November 2012) Table 80