

Overall

5) Which of the following best reflects the extent to which you support or oppose the expansion of London Luton Airport? Please select one option: Strongly support, Slightly support, Neutral, Slightly oppose, Strongly oppose, Don't know. Please provide us with the reasons for your response.

Strongly Oppose.

The most urgent problem facing the planet is anthropogenic global warming caused by the production of carbon dioxide and other potent greenhouse gases. Aviation is a major source of these gases, and to date governments have turned a blind eye to its activities since those activities have yielded short term economic gains. Aviation has been successful in persuading decision makers that the costs of its impacts should not be factored into any evaluation of its operations. We now have the tools to achieve a full cost-benefit analysis, and it has become clear that, not only are the impacts significant, but that those impacts are not shared equally, with those who suffer most being among the world's poorest and least likely to enjoy any benefits of flying. It is also the case that the costs of rectifying the situation are increasing as time goes on. It is significant that the airport has at last realised that it needs to take these things seriously by at least paying lip-service to them in its invention of what it calls 'green controlled growth'.

Why grow?

6) Do you have any comments on our Draft Need Case which sets out the reasons for our proposal to expand the airport?

The airport justifies expansion on the basis of the economic benefits, some of which are undeniable, and which include new jobs. We have been fed this assertion before – it is a tactic used by the airport's supporters to give the impression that objectors are unconcerned for the people of Luton, forgetting, of course, that some of those most severely impacted are Luton residents themselves. The economic benefits of the airport's existence have been 'enjoyed' by the area for many years. Given the apparent run-away 'success' of expansion post 2013, why is it that Luton continues to have areas of deprivation? What guarantees are there that the benefits of expansion which, so far, have not lifted these areas out of poverty, will suddenly start to do so this time around? In 2015, the airport commissioned a report from Oxford Economics¹ which included some projections based on the then cap of 18mppa. The report predicted that by 2030 when 18mppa was due to be achieved, the total number of direct jobs would reach 13,100 whilst that for indirect jobs would be 131,000 nationwide. In 2019, when the airport actually handled 18m passengers, those totals were 10,900 and 28,400 respectively. There are doubtless good reasons why the figures should not be compared, but particularly the number of predicted indirect jobs (which is over-stated by a factor of 460%) seems to have been achieved by multiplying the direct jobs by 10. Airport related employment is frequently over-stated as a cynical supporting argument for expansion. The reality is that airports will do all they can to develop smart systems and replace human workers with robots to reduce costs. The lowest skilled workers are those whose jobs are most vulnerable and are least able to cope with the impact when it happens. This propaganda is both dishonest and cruel.

1. The Economic Impact of London Luton Airport (Oxford Economics 2015)

Benefits of expansion

7) Do you have any comments or suggestions for how we might maximise employment, skills, community and social benefits and training opportunities to help benefit neighbouring communities?

We believe that when a full cost benefit analysis accounting for flight emissions has been carried out (see q5) benefits are a good deal more marginal than the airport would like us to believe. This question appears designed to create the impression that the airport is run on a not for profit basis as a benign social enterprise. The reality is that an unhealthy dependency on the economic success of the airport has been fostered which needs to be broken. It is clear that initiatives to develop skills assume that there will be continuing opportunities for local people to find employment in the aviation sector as it stands at the moment. The airport needs to accept that it has limited potential for further growth, abandon the attempt to expand, and instead diversify. It should be trying to find ways of identifying technologies which have the potential to provide employment in the future, but which are not linked to aviation. Such technologies should be sustainable (contrary to the definition of the word which the aviation industry likes to use, this means that these technologies should be able to operate without compromising the life chances or quality of life of future generations anywhere in the world). An example would be the development of battery and recycling technology.

Our proposed design for the airport

8) *We have made changes to our design since the 2019 statutory consultation. Do you have any comments on our design proposals for the scheme?*

Since we oppose any expansion it would be illogical to make comments about these.

Getting to the airport

9) *Do you have any comments on our proposed Getting to and from the airport – emerging transport strategy? Do you have any suggestions for how we can maximise access to the airport by public/sustainable transport modes?*

Forecast traffic increases in North Hertfordshire are assessed to be up to 2.2%. In fact, previous transport assessments conducted on behalf of the airport have consistently underplayed the impact on Hitchin and North Hertfordshire. Hitchin has two Air Quality Management Areas, both of which will be impacted. The impact on these areas is largely as a result of congestion. How to address this is not covered in any specific way, although improvements to bus and coach services are hinted at. How such improvements could be achieved is unclear. We have in the past called for liaison with North Hertfordshire and Hertfordshire councils about this. There are also plans to improve roundabouts along the A602-A505 corridor, presumably to improve traffic flow. The evidence

suggests that such improvements in traffic flow attract more users into the 'improved' road system, thereby defeating the object of the improvement.

Building our airport

10) We propose to construct the scheme in two phases. Phase 1 would include expansion of the existing Terminal 1 and additional aircraft stands and car parking. Phase 2 would see the construction of Terminal 2 and associated facilities. Do you have any comments on our proposals for constructing the scheme?

We oppose the scheme because of the overwhelming environmental impact it will have and the damage to peoples' lives. Compared with the inevitable consequences if it is allowed, any suggestions we might make about how it should be implemented would make marginal differences, even if they were listened-to.

11) Our proposals also include a Draft Code of Construction Practice which sets out in draft the measures we will take to minimise the effects of construction. Is there anything else you would like us to consider as part of this?

See answer to q10.

The environment

12) Do you have any comments on the environmental effects of expansion and how we propose to manage and mitigate them?

By use of its new gimmick of green controlled growth, the airport seeks to establish itself as a leader in green aviation. If it were serious about this, it would be looking to do something about the most worrying and largest impact - carbon emissions from flights – so called scope 3 emissions. The airport always claims that it has no direct control over scope 3 flight emissions. This is true, but it facilitates them, and they will increase as a result of expansion.

The same is true of emissions as a result of surface access, and particularly the airport's poor record on encouraging a mode shift away from the use of private cars. The easiest way to exercise control over them is to halt expansion.

See also answer to q 13.

13) Do you have any comments on our Green Controlled Growth approach?

Along with a scaling back of the magnitude of development to 32mppa, 'green controlled growth' is part of the airport's charm offensive in response to the negative reaction to its Future Luton proposals of 2018 and 2019. In the document 'Managing and Mitigating the Effects of Expansion', the built-in potential for wriggle room becomes apparent in the approach to noise.

The key feature of the proposals is the establishment of a 'noise envelope'. According to the document;

'We will also define noise limits and controls within which the airport would be allowed to operate as part of a Noise Envelope.'

'A 'Noise Envelope' is a framework of legally binding and enforceable limits and controls to manage air noise.'

'The type and nature of the controls that will apply within the Noise Envelope would be influenced by the Noise Envelope Design Group (NEDG). The NEDG is independently chaired, and includes representatives from local authorities, the community and other stakeholders with the necessary technical expertise.'

In other words, the airport retains control; it decides the parameters of the noise envelope. External (and apparently independent) oversight is provided by the NEDG, but its role is limited to 'influence'. It is unclear what airport representation will be allowed, and what, if any, limits there might be to its input.

The airport does not have a good track record here. The Noise Action Plans of the past contained action points often couched in terms of 'continue to engage with...', 'review ...', 'regular liaison with ...' etc. It was obvious that many of these were window dressing, feeding into a review process which was largely an administrative exercise. The majority of the action points had no direct impact on noise. Where quantifiable targets were mentioned, they were designed to be easily met, with a generous time allowance included to ensure they were never inconvenient. An example in 2013 was to progressively reduce the noise level at which fines are imposed to 80dB(A) by 2020. In a written response to questions by Hitchin Forum, Anne Bartaby of Terence O'Rourke Ltd revealed that, if applied to 2012 flights, just 138 would have been fined – well below 1% of flights for the year. Had the deterrent value of the measure been effective, it would have resulted in just 1 aircraft flying more quietly every 2.6 days in 2012. In 2017, 2018 and 2019 we saw that the airport was prepared to act in bad faith and tear-up the rule book when the limits it agreed to were breached.

There is nothing in the current proposal which limits the number of airport representatives on the NEDG. How breaches of the noise controls would be treated is unclear. Crucially, how the system would control growth is also unclear. It is obvious that growth will be prioritised over control of noise impacts.

What is necessary is a system in which the airport demonstrates that it can reduce noise as a precondition to be satisfied before further increases in flight numbers are triggered. It will never agree to such an approach because noise is not as simple to reduce as it would like us to think – modernising a carrier's fleet by the purchase of newer aircraft does not necessarily lead to them being able to operate more quietly in the Luton context. The same applies to the approach to other environmental impacts.

Open space

14) Do you have any comments on our open space and landscaping proposals? Is there anything else you would like us to incorporate?

The noise impact in the area to the east of the runway reduces tranquility, even during the pandemic. The only way in which tranquillity could be improved is by a reduction in the number of flights, not an increase. We therefore oppose the expansion plans.

Compensation and Community First Funding

15) Do you have any comments on our proposed compensation policies and measures?

We oppose further expansion of the airport, but would support compensation for those people who were significantly adversely impacted by the non-permitted development which occurred in 2017, 2018 and 2019 and led to the breach of planning condition 10 (noise contours).

16) Do you have any comments about our proposals for the Community First scheme?

We oppose further expansion of the airport, but would support Community First payments to all communities which were significantly adversely impacted by the non-permitted development which occurred in 2017, 2018 and 2019 and led to the breach of planning condition 10 (noise contours).

Further comments

17) Do you have any other comments about our proposals to expand London Luton Airport?

Instead of considering further expansion of Luton Airport, Luton Rising should make redress for incentivising over-rapid growth following the 2013 expansion permission, and ensure the airport is instead incentivised to operate within its existing permissions as it recovers from the effects of the pandemic.