

Written Representation Re. Luton Airport Expansion (WR Ref: 20114)

This Written Representation succeeds an earlier Relevant Representation and the oral contribution made at the Open Floor Hearing on 11 August 2023 by Professor Hartley Dean, registration identification number **20038070**.

I make this representation: first, as a resident of Flamstead, a village in Hertfordshire close beneath the flight path of Westerly departures from Luton Airport; but also as an Emeritus Professor of Social Policy from London School of Economics.

1) As an affected **resident**, I have lived with my wife in Flamstead for some 30 years and have directly experienced disturbance from aircraft taking off from LLA, an issue that has incrementally worsened with sustained increases in air traffic movements especially after 2008 and 2013, with only a temporary respite during the Covid lockdown. It is a problem that affects our quality of life, most especially in the warmer months when one might like to have windows open or spend time in the garden. With fellow residents, we have over the years complained and objected, but to no effect. Dispirited by the relentless intransigence of a powerful and well-resourced entity, I fear too few of us now have had the energy to engage with this latest inquiry such that the scale and depth of opposition to these latest expansion proposals may be underrepresented. Nevertheless, the prospect of a further doubling of air traffic movements is a matter for despair. Yes – human beings are adaptable: they can learn by default to endure intrusive noise. But why should we have to tolerate a further detriment to the quiet enjoyment of our homes?

2) The *right* to quiet enjoyment is relevant to my **academic** interests in rights and needs. I am the author of a book entitled *Understand Human Need* [Note i] and would challenge the Applicant's case for the 'need' for airport expansion. Consumer demand is not the same as need. Human beings do not need to fly! Air transport may be what's called an 'intermediate satisfier' of certain human needs and can have a part to play in sustaining human welfare. Without doubt human beings need recreation, and a holiday in the sun might reasonably satisfy that need. But does that accord them a right that trumps the right of others to the quiet enjoyment of their homes? Paradoxically, it may be that the effects of climate change – to which aviation is a major contributor – will quite soon render many popular holiday destinations less attractive and so nullify the Applicants' forecast of demand for holiday flights. But far more important, is the human species' fundamental need for survival in the face of the existential threat posed by global heating.

3) And here, I would implore the EA to pay close and critical attention to whether *on the evidence* the Applicants' proposals are – as they claim – achievable and commensurate with UK government's commitment to net-zero carbon emissions. The UK's Climate Change Committee's *2023 Progress Report* [Note ii], has stated that the government's *Jet Zero* strategy [Note iii] faces 'considerable delivery risks' and concluded that there 'should be no net airport expansion'. Also relevant, in my submission, is the Royal Society's recent report on *Net zero aviation fuels* [Note iv], which bluntly concludes that for aviation at present no credible alternative to fossil fuels exists.

4) I would similarly ask the EA critically to scrutinise the Applicant's analysis of the socio-economic impacts of its proposals. My particular concern is with employment forecasts. Airport expansion

applications have an unfortunate tendency to overestimate the job creation potential of their proposals [Note v]. And importantly, it's not just the projected number of jobs that matter, but their socio-economic distribution. According to the reports from the 2019 and 2022 Oxford Economics Reports [Note vi] upon which the Applicant relies, higher paid directly employed airport staff do not live within Luton and Bedfordshire area, while those who do, have lower earnings typical of the area. In this light I would question the extent to further expansion of Luton Airport will contribute anything of significance to the government's 'levelling up' agenda. A more effective and sustainable socio-economic development agenda would be to curtail or at least pause aviation (at least until carbon-free air travel is demonstrably possible) and to progress towards a *localised* green growth strategy [Note vii].

5) My Relevant Representation indicated that I would also question the adequacy of the Applicant's proposed mitigation measures with regard to health and social wellbeing at both local and global levels, though the primary emphasis of my submission has been upon the avoidance rather than the mitigation of the adverse impacts of airport expansion. In the event, I am aware there are other parties who may deal in detail with the question of mitigation measures. There is, however, one potential omission from the discussion of mitigation that so far as I can see may not otherwise receive mention, namely growing concerns recently expressed with regard to the health impacts of ultrafine particulate emission [Note viii]. The Applicant's position is that the increase in air traffic resulting from current proposals will (subject to mitigation measures) give rise to an insignificant increase in particulate emissions, by which they allude only to PM_{0.25} and PM₁₀ particulates (which are reported to be within UK but not WHO limits) but there is no mention to ultrafine (PM_{0.1}) emissions.

6) I am aware of the considerable value of the work undertaken by the various community-based charitable organisations which are dependent for their funding on the Luton Rising Community Investment Fund. In a mixed economy of welfare, the voluntary sector has a vital part to play. I can well understand why some of them should make representations in support of the Applicant's proposals and would not for a moment impugn the good faith and integrity of such groups/agencies. Nonetheless, I cannot help but feel that, ethically speaking, some charitable organisations – if constitutionally they are accountable to the particular communities they serve – might in such circumstances be uncomfortably placed. In past years Luton Borough Council, as owner of Luton Airport, had defended the presence and growth of the airport because of the revenue it provided in support of **statutory** services. Since 2004, however, it appears that the administration of grant aid to **voluntary** sector providers administered under the discretionary powers accorded to local government has passed directly, initially to Luton Airport Limited and now to Luton Rising. Voluntary sector organisations are uniquely placed to speak independently in the interests of the communities they serve, but such independence may be compromised when the interests of their funding agents and those of the communities they serve conflict. This possibility could evidently apply in relation to adverse environmental impacts that may – arguably or in certain respects – have consequences for such communities. I raise the point reluctantly, but such circumstances could open the door to charges – whether justifiable or not – of so called 'charity washing'. It is, of course, for the EA to consider whether, in the current instance, this is a matter of any concern.

NOTES

i) Dean, H. (2020) *Understanding Human Need*, second edition, Bristol University Press.

- ii) Climate Change Committee *2023 Progress Report to Parliament* – available at www.theccc.org.uk/publications
- iii) Department for Transport (2022) *Jet Zero strategy: delivering net zero aviation by 2050* - available at assets.publishing.service.gov.uk
- iv) Royal Society (2023) *Net Zero Aviation Fuels: Resource requirements and environmental impacts policy briefing*, available at royalsociety.org.uk
- v) Sewell, B. (2009) *Airport Jobs: false hopes, cruel hoax*, Aviation Environment Federation.
- vi) See document 5.02 Environmental Statement, Appendix 11.1
- vii) I am mindful that the Examining Authority is necessarily legally constrained and technically focused, and therefore unable in any detail to dwell on counterfactual alternatives. The point to be made, however, is that there are alternative perspectives on ‘growth’ and socio-economic development: see – merely by way of example – Hickel, J. (2022) *Less is More: How degrowth will save the world*, Penguin Random House.
- viii) See World Health Organisation (2022) *Global Air Quality Guidance* – section 4.3