



Daisy Cooper MP

Member of Parliament for St Albans

House of Commons, London SW1A 0AA

██████████@parliament.uk

Written Representation from Daisy Cooper MP to the examination of the application by London Luton Airport Limited for an Order Granting Development Consent for the London Luton Airport Expansion Project

Unique Reference: 20040600

22 August 2023

I am writing in my capacity as Member of Parliament for St Albans, to register my **OBJECTION** to the proposed expansion of Luton Airport.

Climate Emergency

Fundamentally, I oppose any further expansion of aviation capacity on the grounds that the Committee on Climate Change (CCC) and the Intergovernmental Panel on Climate Change both strongly recommend urgent measures to reduce demand for air travel. Any increase in air transport capacity at one airport must therefore be matched or exceeded by a corresponding reduction at other airports, in order to meet the UK's commitment to achieving net zero carbon emissions by 2050.

Advice to the government from the [CCC in September 2019](#) was explicit that not only is aviation likely to be the largest emitter of CO2 by 2050, but that relative emissions from aviation could only be reduced by 20% using fuel efficiency measures. As such, a 77% increase to Luton's capacity – which these proposals would deliver – is contrary to the government's obligation to reach Net Zero by 2050.

Further, Luton's proposals should be viewed in the context of expansion plans by other airports across the country. In the London region alone: Heathrow intends to move forward with the construction of a new third runway, which could almost double their annual passenger capacity from around 80million today, to more than 140million on completion; Gatwick has consulted on bringing its emergency runway into regular use increasing capacity from 45million to 75million; and Stansted's approved upgrades are likely to result in an increase of passenger numbers from less than 30million to more than 40million.

Claims of economic benefits and job creation debunked

Claims by the airport of the economic benefits to our local communities of quality job creation have also been thoroughly debunked. [Some economists have described](#) the air

transport sector as “one of the poorest job creators in the economy per pound of revenue.”

Unlike other sectors, productivity gains have led to a proportionate drop in the absolute number of people employed in the sector and have not resulted in an increase to salary levels. In fact, air transport wages have fallen in real terms over the last two decades. In the period between 2008 and 2022, for instance, air transport saw the largest real terms pay decline of any sector in the country.

Economic benefits of improved air connectivity have also diminished since the turn of the century. The digital age, turbo charged by the necessities of the Covid pandemic, has resulted in virtual meetings taking the place of the short haul business routes available from Luton. Growth in business air travel effectively ceased in 2012, with a net decline expected in such trips expected in the coming decades.

Any growth in passenger numbers is therefore to be from recreational travel, from a comparatively wealthy minority who can afford to be frequent leisure travellers. This is while one in two UK residents either choose not to fly at all, or simply cannot afford to do so.

The effect to the UK economy of increased air capacity from Luton will likely be negative overall, as domestic hospitality spending is routed abroad, and the number of inbound tourists to the UK expected to remain lower than pre pandemic and pre Brexit levels.

Any other arguments that might be made in favour of a supposed economic benefit for increased capacity, simply cannot therefore be squared with the significant environmental cost of these plans.

Surface Access

The airport operators acknowledge that the majority of surface access journeys to and from the airport are road traffic, and that their planned expansion would therefore increase the volume of traffic on both the local and strategic road network.

Luton Rising’s own pre consultation documents aim for only a modest uplift from 38% to 45% of their passengers expected to use public transport to access the airport.

Based on the operator’s own assumptions, the number of passengers arriving by private car should the expansion plans go ahead would rise from around 11million per year in 2019, to more than 17million in 2050.

The impacts of such a significant increase in traffic congestion are not just felt in the immediate vicinity of the airport. My constituency and the surrounding district of St Albans are likely to experience the knock on effects of such a dramatic increase in private car use to Luton Airport. It is essential that the local effects, and not just the aggregate numbers, are measured and limits imposed. Key routes across the catchment area should therefore be monitored by employing ANPR or similar technology in areas such as St Albans, to measure the increased traffic volumes – and critically expansion should be halted if serious

deleterious effects are felt in any of the surrounding areas.

Aircraft Noise

The negative health effects of aircraft noise are well documented. There is compelling evidence that aircraft noise during the time when most people are asleep directly contributed to high blood pressure, strokes and heart attacks. Road and occupational accidents are more likely in areas of high night time aircraft noise, and the stress caused by continual overhead noise is a risk factor for deteriorating mental health.

The application by Luton Airport to regularise the increased noise, particularly during night time hours, by way of submitting application 21/00031/VARCON breaks the commitments given to my constituents and the wider community to reduce the impacts of aviation noise on our area.

In 2019, Luton Airport was found to have breached their aircraft noise limits for three consecutive years. Promises to introduce quieter aircraft have been broken, with the introduction of new A321neo aircraft failing to reduce the noise pollution blighting the region.

In my constituency, the North of St Albans is particularly impacted by Luton based aircraft noise. Constituents tell me that in addition to the increased air traffic, changes to flight path routing introduced by NATS and the CAA in the last few years have resulted in their exposure to aircraft noise being intensified, by concentrating the approach and departure of aircraft in a narrower path above their homes.

As an absolute minimum, no expansion at all should be allowed until and unless promises on noise reduction are fulfilled, and a demonstrably independent body is established to monitor and report on air noise targets.

Perceived conflicts of interest and transparency

The ongoing travesty of Luton Council being permitted to both determine whether the airport is meeting its targets, while directly financially benefiting from the continuing expansion of airport operations, is not addressed by the DCO application. The proposal for “independent scrutiny and review” that is supposedly at the heart of the Green Controlled Growth (GCG) plan still relies upon Luton Council being tasked with considering and taking enforcement action against the airport operators.

While the proposed Environmental Scrutiny Group would include representatives from other authorities, it is Luton Council who will be given the final say in any enforcement action. Given the reluctance of that authority to impose any meaningful sanctions on the operator when they have breached noise limits in the past, and their willingness to approve retrospective applications to “regularise” breaches of night time operations, noise and passenger limits, I have no confidence there this process can be independent.

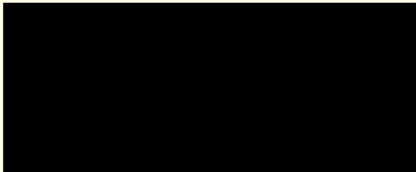
It is of grave concern to me that the only right of appeal included in the GCG document is for the airport operator to the Secretary of State. No form of appeal appears to be available to local authorities, or local communities, whose lives are set to be disrupted should further expansion go ahead.

Should the DCO be granted, and a condition attached for independent monitoring and enforcement, this should be carried out by a truly independent body with no perceived financial interests in the commercial success of Luton Airport. It is clear that communities and elected representatives across the region have no confidence in Luton Council's ability to appear objective when considering imposing penalties on the enterprise responsible for a primary source of their revenue.

Conclusion

The proposals for expansion cannot adequately address the serious negative implications of further expansion at Luton Airport. Such an expansion will further increase overall carbon emissions and worsen air quality in the surrounding area; amplify the misery of aircraft noise for the many communities in the flight paths; and put further strain on an already congested road network.

Yours sincerely,



Daisy Cooper MP
Member of Parliament for St Albans