

National Infrastructure Planning: Application by London Luton Airport Limited for an Order Granting Development Consent for the London Luton Airport Expansion

Andrew Ferguson: Registration as an Interested Party and Written Representation

Submitted by kind permission of the Examining Authority and Rammiel Burnie, Case Officer, Nationally Significant Infrastructure Projects (NSIP)

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Submitted by

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Written Representation

Summary

I am a long-time Luton resident who has lived at my present address for 40 years. LU1 is one of the postcodes most severely impacted by the airport's activities.

I am opposed to London Luton Airport's application for consent to expand for several reasons. Foremost amongst these, in its personal impact on me, is noise pollution to the local environment. I am also particularly concerned about impacts on biodiversity, the inadequacy of proposed measures to compensate for this, and the impact on greenhouse gas emissions. The fleeting economic and social advantages of increased and more rapid travel from Luton Airport (or any other) cannot be justified when set against the long-term damage to health and environment.

Responses to particular sections of the Application

6 Agricultural land quality and farm holdings

Any non-essential development on agricultural land should be avoided at a time when global food security is increasingly under pressure from climate change. The UK is far from self-sufficient in food production. According to Defra in 2021 "The UK currently produces about 60% of its domestic food consumption by economic value". There is also competition for land from solar farms and housing. It is very questionable whether the further development of Luton Airport could be regarded as essential in any terms, economically (see 11.3 below), socially or environmentally.

7 Air quality

There can be little doubt that there would be negative effects on air quality in the Luton area in the short-to-medium term, should this application be approved. The most obvious impact on air quality at my address is occurrences of a strong smell of aviation fuel in the air, when I have to close my windows

and doors. Associated road traffic emissions and carbon emissions have wider and more serious negative impacts. The proposal could only increase these.

7.2c Mitigation measures for the impact on air quality

Many of the mitigation measures listed rely on 'encouraging' the uptake of cleaner technologies by individuals or businesses, and even "encouraging the uptake of sustainable aviation fuels". The latter is an expression of hope for a technology that is in its infancy and can't be relied upon to make significant impact for many years. Moreover, the Applicant will not be responsible for providing it. 'Encouraging' is good, but unless stronger requirements are imposed, or the application is refused, persistent deleterious effects are unavoidable.

8 Biodiversity

I am very concerned about the negative effect of the proposal on local biodiversity and environment. Paragraph 8.3.2 is a glib and over-optimistic statement of the expected success of the mitigation measures outlined in section 8.2. Given the timescale for recovery, or for development of replacement habitats, who would be held responsible if this assessment is not right?

The claim that the biodiversity will be increased by the establishment of a new park, following the destruction of Wigmore Valley Park, a County Wildlife site, is an unconvincing assertion. Wigmore Valley Park has diverse habitats, flora and fauna, that have developed over many decades. It is particularly notable for its wild orchids, which are very difficult to transplant successfully.

The proposal fails to provide the necessary degree of assurance that the plans to replace lost biodiversity are deliverable and that a biodiversity net gain would be achieved.

11 Economics and employment

11.3 Likely significant effects

Economic arguments in favour of the proposed development are weak. There are more promising and sustainable options. The climate crisis and the need for sustainable and politically-secure energy sources create new opportunities in light engineering, an area where the UK (and Luton) traditionally excels. Such development opportunities would be better investments and support the environment rather than damage it.

12 Greenhouse gases

I object to any expansion of airports, and of Luton Airport in particular, on the grounds that it would lead to increased emission of greenhouse gases at a critical period when there is an urgent imperative that such emissions should be minimised, to avoid the increasingly real risk of runaway global warming. This is not a time to meet unfettered demand in order to obtain short- or medium-term economic gain. Rather, it is a time to manage demand down, for the sake of future generations. Flying is unlikely to become environmentally sustainable within the short timescale that is left to avoid catastrophic climate change. There is a pragmatic and a moral case against the proposed development on these grounds alone.

12.2 Mitigation measures

The mitigations that are within the power of the proposer to deliver are few and weak. Others are optimistic and rely upon projections, third parties and an international agreement. The confident conclusion expressed in paragraph 12.3.5 "that the overall impact of the Proposed Development was Minor Adverse and Not Significant" is shockingly hubristic.

16 Noise and vibration

16.2 Mitigation measures

16.3 Significant adverse effects on health and quality of life and likely significant effects

Air noise pollution

I have been a Luton resident for 43 years, [REDACTED]. In recent years the growth in flights has greatly increased. The summers of 2018 and 2019 were the first in which I regularly suffered sleep disturbance from the take-off and landing of aircraft at night. After some relief during the Covid pandemic, this pattern has resumed. Given this pre-existing level of disturbance, which I very much deprecate, I strongly object to the proposed dramatic further growth of flying, resulting in loss of sleep and consequential damage to health. It would also be harmful to the health of a wide range of communities to east, west and south.

16.1.5 The expectation that aircraft will in future be permitted to climb more quickly from the airport will only serve to exacerbate the noise problem locally to the airport. This would include my address.

16.2.4, 16.2.8 The noise insulation scheme is to apply only where air noise exposure from the proposed development exceeds the “relevant significant noise thresholds”. This means that noise insulation would be offered only to the worst affected areas and this would not include my area. Nor would it help when windows need to be open for ventilation, likely to be an increasing need as the climate warms, or protect the amenity value of outdoor spaces and private gardens.

16.2.6 The proposal to maintain the existing restrictions of 9,650 aircraft movements during the night quota period (from 23:30 and 06:00) offers no comfort. I already experience disturbed sleep with these restrictions in force. The proposed mitigations could have no ameliorating effect on increased noise associated with the large increase in aircraft movements proposed outside those hours.

My conclusion

It is my view that the Application by London Luton Airport Limited for an Order Granting Development Consent for the London Luton Airport Expansion should be refused.

Andrew Ferguson

30 August 2023