



The countryside charity
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Jo Dowling
Lead Member of the Examining Authority
National Infrastructure Planning
Temple Quay House
2 The Square Bristol
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Our Ref: 20039828

4th October 2023

Dear Ms Dowling,

**Application by London Luton Airport Limited for an Order Granting Development
Consent for the London Luton Airport Expansion project**

**Comments on Library document REP1-023 Volume 8 Additional Submissions
(Examination)**

**8.31 Applicant's Response to Relevant Representations - Part 2C of 4 (Non-Statutory
Organisations)**

We write with regard to the above submission by Luton Rising in response to the joint Relevant Representation by CPRE Bedfordshire and CPRE Hertfordshire opposing the proposed expansion of Luton Airport to accommodate from 18 million to 32 million passengers per annum. The joint CPREs have reviewed the response contained in the above referenced Inquiry document and both wish to maintain their position and identify further concerns arising from the responses.

The Applicant's response is voluminous, comprising large sections of the joint CPRE Relevant Representation quoted verbatim, to which Luton Rising responds over 33 pages under a series of topic headings. The initial response by the Applicant (page 45 op cit above) under the topic heading "General" identifies that the primary justification for the proposed expansion is due to the perceived economic benefits of air transport in the context of Government policy.

The airport is noted as being central to the local economy, an important connectivity asset, supporting regeneration in Luton, and lacking the capacity to expand. These justifications were presented at length in the original documentation for the Inquiry, and nothing appears to be gained by re-stating previously expressed positions without further analysis or amendment.

In general, following the initial statement as above, the Applicant's response comprises a series of further re-statements and references to documentation previously submitted, primarily in the case of the joint CPRE submission, to relevant chapters in the Applicant's Environmental Statement (ES) and specific appendices, the Need Case, Planning Statement and Transport Assessment. Frequent reference is also made to the Government's Jet Zero Strategy which is said to represent current UK Government policy on aviation.

The process of reference to already submitted documentation continues throughout the response under each sub-heading, including: Design, Green Controlled Growth, Climate Change, Landscape and Visual, Noise and Vibration, Air Quality, Surface Access, Forecasts Economics, Health and Community, Planning, Wigmore Valley Park and Fleet mix. In the majority of entries, no new analysis or justification is cited and the Applicant's response is most frequently a re-statement of previously indicated positions and documentation.

The Applicant's response makes no attempt to refute the significant legal challenges which have been made to the Government's Jet Zero Strategy (Mr Justice Holgate, 2022) nor the technical positions promoted by opposing parties to the Inquiry. It is thus inappropriate for the Applicant to suggest that the relationship between economic growth and demand for air travel is not changing, particularly with regard to the implications for environmental harm, both locally and more widely.

With regard to specific responses, under the sub-heading "Economic case and job creation" (page 75 op cit), the joint CPREs note that "Luton Council has relied for too long on the Airport as an income generator and employment hub." The Applicant then states, that "the Applicant is not responsible for Luton Borough Council's wider economic strategies, and therefore does not feel it is appropriate to comment on this point".

This position is entirely untenable and inappropriate when the context for the proposed expansion of the airport is predicated entirely on economic growth projections and objectives, and the Borough Council is the effective owner of the Airport. The financial and economic linkages between the Council and the Airport are a justifiable concern of the opposing parties and it is not reasonable for the Applicant to seek to avoid responding to the implications of the cooperation between itself and the Council.

The Issue Specific Hearings (ISH) have also highlighted many gaps and inconsistencies in the Applicant's case. The 185 Action Points identified from these sessions (most of which need to be dealt with by the Applicant) demonstrate how many queries could not be answered by the Applicant at the Hearings and how much further work is required to be undertaken.

Many of these gaps are fundamental. For example, the Applicant claims in their response to our representations that the principle basis for the economic case "relates to delivering jobs and economic benefits to the local area". Yet they could not explain how their proposed Employment Training Strategy, which is a key component for delivery, differs from their Employment Skills and Resources Programme signed in 2012, supposedly to deliver jobs and economic benefits.

This programme has clearly not been a success, as eleven years on Luton still has high levels of deprivation and the lowest median wage in the Three Counties. We ask why a new similar strategy should deliver results when the previous one has clearly failed.

The ISHs have demonstrated how much of the Applicant's case is built on their own assumptions, modelling and long-term forecasting, all of which contain significant risks. As we stated in our original representation, many of these assumptions and forecasts are outside the Applicant's control, in particular those underpinning air quality, pollution and noise impacts which are reliant on the introduction of new untested technologies.

The scale of the proposed increase in movements at the Airport is massive, and can be seen as a major step change rather than incremental growth. In deciding whether the benefits outweigh the irreparable harm the development will cause, the Inspectors will need to carefully consider what is likely, deliverable and the huge risks and uncertainties attached to the assumptions made.

At this time of Climate Emergency the joint CPREs remain of the view that proposed development of this scale, with its severe detrimental impacts on the environment and the countryside are inappropriate and unjustified. The Applicant's responses have not dealt with our concerns and we remain strongly opposed to the proposed expansion.

Yours sincerely

Susan Lynch

Susan Lynch
CPRE Bedfordshire