

October 2023

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.56 Applicant's response to Deadline 2 submissions
(Comments from Interested Parties on Deadline 1
submission) Appendix H - Hitchin Forum**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.56

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

**London Luton Airport Expansion Development Consent
Order 202x**

**8.56 APPLICANT'S RESPONSE TO DEADLINE 2 SUBMISSIONS
(COMMENTS FROM INTERESTED PARTIES ON DEADLINE 1
SUBMISSION) APPENDIX H – HITCHIN FORUM**

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Table H1.1 Applicant's response to Hitchin Forum's comments on Deadline 1 submission

I.D	Response Topic	Comments on deadline 1 submission (Verbatim)	Luton Rising's Response
1	General	<p>Hitchin Forum's Response to the Applicant's Response to its Relevant Representation</p> <p>In general, the Applicant's response to our Relevant Representation amounts to a re-statement of sections from the original submission documents. We would like to take the opportunity of responding in 3 areas.</p> <p>The page numbers given below refer to Volume 8 Additional Submissions (Examination) 8.31 Applicant's Response to Relevant Representations - Part 2C of 4 (Non-Statutory Organisations).</p>	Noted.
2	Need Case	<p>The Need Case and Sustainability</p> <p>We argued that 'need' is not the same as increasing demand for cheap leisure flights, and that the low proportion of passengers flying for business purposes (i.e. because they need to do so) does not justify a 'need' case: expansion is therefore, by definition, unsustainable.</p> <p>In response, the Applicant states 'Although the majority of passengers using London Luton Airport are travelling for leisure purposes, a high proportion of these passengers are foreign resident inbound visitors and of the UK resident leisure passengers, over half were visiting friends and relatives abroad.' (page 118)</p>	<p>Government policy is clear that growth in air transport is supported whether for business or leisure purposes. This was made clear by the Prime Minister in response to a question, specifically in relation to the Proposed Development, raised during the Prime Minister's Questions as recently as 13th September.</p> <p>Airlines rely on being able to meet a variety of passenger demand to make air services viable. Hence, if attempts were made to limit outbound leisure passenger trips, this would mean that many routes across all airports would cease to be viable and this would not</p>

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		<p>As to whether the number and proportion of these passengers justifies the need case, figures showing how both the proportion and numbers have varied over recent years in order that the effects of Brexit and other variables can be considered and future projections can be made.</p> <p>It may be that these passengers, together with those travelling for business, can be catered for with less rapid expansion than is actually being sought, or even no expansion at all.</p>	<p>guarantee that business or visiting friends and relatives requirements could be met.</p>
3	Climate Change Need Case	<p>Climate Change and Risks to the Local Economy</p> <p>The Applicant seeks consent for a project which extends over a significant period of time, during which there will be several changes of national government.</p> <p>Whilst scientists are reluctant to attribute the cause of individual extreme weather events to increasing carbon emissions, the frequency of such events is increasing in a way predicted by recent modelling. The public are increasingly aware of this and public opinion may generate political pressure to change the approach of national governments.</p> <p>Peer reviewed evidence for man-made climate change, understanding of the variables which affect it and the</p>	<p>The Applicant understands that policy may change over time, however considers it reasonable to assume that government policy on decarbonisation will be delivered, as the UK Government is ultimately responsible for delivery of the UK's net zero target and interim carbon budgets. The Applicant also accepts that the development will result in increased flights, analysis of which has been included in Chapter 12 Greenhouse Gases of the ES [APP-038].</p> <p>The application is fully consistent with the Government's Jet Zero Strategy and is, therefore, consistent with current policy in this regard.</p>

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		<p>consequent effects, is strengthening all the time alongside the sophistication of modelling.</p> <p>The view which future governments take, therefore, regarding the degree to which they are prepared to ignore the advice of a body like the Climate Change Committee, which has called for a halt to airport expansion, could change.</p> <p>Scope 3 flight emissions are a major contributor to the problem and are facilitated by airport expansion.</p> <p>'Jet Zero' has been heavily criticised for its reliance on hoped-for 'step changes' in technologies which are currently in their infancy, and which may not materialise. The approach could change in future.</p> <p>Legally binding targets can be altered – there is already pressure from the current government's own MPs to roll-back on its commitment to net zero – equally targets may be strengthened or added to.</p> <p>There may come a time during the lifetime of the project when a future government will decide that the costs of reversal or mitigation of emissions trends due to aviation are so great that they can no longer be ignored.</p>	<p>Carbon emissions for aviation in the ES are modelled on the Jet Zero Strategy High Ambition scenario that does represent current UK Government policy on aviation. The greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK Emissions Trading Scheme (UK ETS) within the European Economic Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSA). The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050.</p> <p><i>As set out in the Jet Zero Strategy, it is anticipated that the measures being taken to decarbonise aviation will be sufficient to allow growth to continue to meet consumer demand. The risks of this not being achieved are considered low and, in any event, should growth be slower than anticipated, the pace of development would be slower than the Core Planning Case with both benefits and environmental impacts realised at a later date.</i></p>

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		<p>The Applicant's response to our submission, states, with regard to a carbon cap 'This cap will be reduced over time stimulating innovation by participants to increase the carbon efficiency of their operations, or indeed to take steps which would reduce the overall scale of their operations.' (page 121) On the basis of its claim that expansion now is essential, this is a surprising admission for the Applicant to make.</p> <p>The possibility of having to reduce the scale of the airport's operations presents a major risk for aviation in general, and the local economy in particular, if it fails to diversify.</p> <p>Has the Applicant fully investigated the risks and considered alternatives to expansion?</p>	
4	Green Controlled Growth Noise and Vibration	<p>Effectiveness of Green Controlled Growth with regard to Noise</p> <p>The Applicant accepts our point about thresholds being set which are very close to limits, 'The operator is aware of this decreased margin for error and a unique approach on noise is taken within the GCG Framework.' (page 131)</p> <p>A 'decreased margin for error' suggests that a breach of a limit is likely in a way that should be quantified.</p>	<p>As part of the Noise Envelope – Improvements and Worked Example [REP2-032] published at deadline two, updates have been proposed to the Noise Envelope based on further analysis of the causes behind the historic breaches of noise contours in 2017-19.</p> <p>One such update is to lower the L1 and L2 Thresholds to 85% and 95% respectively to provide sufficient advance warning in order to</p>

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		<p>The acknowledged 2 year time lag between the occurrence of a noise emission breach and any corrective action being taken is a very long time for those affected to have to endure potentially health damaging levels of noise.</p> <p>What is important is not whether the GCG approach is unique, but whether it is effective.</p> <p>It is for the Examination to decide whether the risk of leaving those living under the flightpath exposed to potentially damaging noise for two years is an effective or acceptable feature of GCG.</p>	<p>avoid future breaches, taking into account the timeline for slot allocation.</p>