

This expansion of capacity at Luton is dependent upon the Swanwick AD6 Airspace change. My comment is that Luton did not fulfil its obligations under clause 172 of CAP1616 and therefore the consultation was flawed. That being the case then the application to expand Luton capacity is based on an unapproved flight path. My objections to the Swanwick AD6 are as follows:

1. The proposer is proud of having received 2426 responses from an area with a population of more than 10 million (their number). I suggest that perhaps you should reconsider what is a statistically significant response. Less than 0.025% is not statistically significant and will have been biased toward those with time to watch local news. I cannot find anyone in my village of Hardwick that had heard about this 'consultation'. I don't watch local news or read local newspapers. By stark contrast, with the East West Railway consultation I have received documents through the door and get regular email updates. The entire area has been actively engaged within the community and with the leading developer. It seems that they understand the real meaning of a 'Consultation' includes actually talking to people.
  2. Also, please look back at the 2008/9 attempt to change the Luton flight path. From memory there were 15,000 responses and 85% were against. Did you think that we all changed our minds? The reality is that choosing to run a consultation during lock down meant that the vast majority of people were too concerned with life and death issues. They were probably watching the pandemic news rather than local media. Some people might conclude that the intention was to hide the consultation in a 'bad news year'.
  3. Anthony Browne MP led a debate in parliament on this issue and was strongly supported by other MPs (see <https://www.youtube.com/watch?v=9MVpB6Wk8e0> ). I am impressed by the work Anthony Browne has done on this question and urge you to take stock of his proposals made to the House of Parliament which is the elected body for the United Kingdom (and that includes Luton airport):
    - 3.1 The poor attempt to cover up a failed 'Consultation' is proving so unacceptable that it led to a debate in Parliament. The first proposal from this debate is that in the circumstances the 'Consultation on the Swanwick AD6 should be re-run'. Clearly this time the affected population should be properly informed by post as well as through local media to ensure that all are able to respond.
    - 3.2 A 'Post Implementation Review' should poll the affected population as part of the process. Luton marking its own homework is not acceptable. The second recommendation from the Parliamentary debate was therefore that the people under the flight path be included in the PIR.
    - 3.3 Levels of acceptable noise in rural areas should be reconsidered bearing in mind the low ambient noise level.
    - 3.4 Recognise that this new flight plan is not to deal with existing air traffic, but to facilitate a near doubling of landings at Luton, an expansion rejected by the population of Luton.
    - 3.5 There should be greater transparency of the collected data. In order to make a clear argument around the noise pollution resulting from this change to flight patterns the data collected should be shared with local residents. I understand that up to now this has not happened.
    - 3.6 Apparently Luton Council owns the land on which Luton Airport is situated and consequently will benefit financially from increased air traffic. Meanwhile the dis-benefits including noise pollution will fall on surrounding areas. Clearly this is a conflict of interest and any financial benefits should be transferred in full to those regions affected by the change.
- Thank you for considering my comments.