

I was unable to speak at the open hearings last week because of personal reasons. Had I spoken last week I would have been advocating that permission for the uplift in capacity to 32 million passengers per annum be withheld on the following grounds:

Has the need for this increase in capacity post Brexit and post pandemic been proven?

Is this increased capacity vital to the UK economy: will the increased traffic help us to fulfil critical supply chains and grow GDP or is this purely to satisfy the holiday needs of less than 50% of the UK population?

Even if the need has been proven, should we in the UK be meeting that demand giving the global climate crisis the world is facing and the net zero targets we are aiming to achieve?

Isn't the rational thing to do to continue to invest in, and ramp up the process for, developing greener air transport which satisfies net zero targets and then evaluate the impact of that on airport capacity at Luton and throughout the UK?

And then formulate an appropriate aviation and broader transport strategy which supports the UK's strategy for economic growth.

Given the inequality between London and the SE of the UK, if it is justifiable to increase air traffic capacity on macro and socio-economic grounds is it right for that expansion to almost exclusively be focussed on London and SE. Shouldn't we be growing the airports around our second cities – Manchester. Birmingham – to support their growth and reduce inequality?

The negative impact of aircraft noise on health and wellbeing is well documented. Similarly, the importance of positive health and wellbeing for reducing economic inequality. On this basis, increasing air passenger capacity doesn't facilitate economic equality, and serves to benefit the wealthier and time rich members of the UK population, increasing economic inequality and taking valuable funds out of the UK.

If the uplift is approved, there is no turning back ...

... so don't do it now.

Having listened to a number of the presentations made at the hearing, I see no reason to change my thinking.

At the highest level, it's the responsibility of the UK government to consider the consistency of its air capacity policies with those of climate change, an economic growth agenda which makes more of Britain's strength as the second net exporter of services in the world and an agenda for decreasing inequality.

**There is no evidence of a sustainable macroeconomic benefit to justify the expansion proposed:**

The recent work of the New Economics Foundation rightly calls for a review of the economic benefit of air traffic expansion in the UK. The UK is already one of the best-connected nations in the world, but sees a strong outbound tourism bias, therefore the case for growth appears to rely almost entirely on the presence of business air passengers. Net business air passenger growth has effectively ceased, which diminishes the macroeconomic benefits of British air capacity growth.

**There is no evidence that there are long term socioeconomic benefits to the Luton community from employment at the airport:**

The October 2023 confirmation letter for the expansion of London Luton airport to 21m passengers highlighted the socioeconomic benefits of doing so. Many of the presentations by local groups emphasised the funding support received from Luton Rising and the importance of employment prospects in mitigating the extreme deprivation experienced in Luton.

Luton is undoubtedly a town scarred by deindustrialisation and experiences high levels of inequality.

Good work and empowered workers are needed to boost growth and reduce inequality. There is no evidence that expanding the airport will achieve this.

Like Gatwick and Heathrow airports, London Luton airport is not totally UK owned. Remote ownership denudes the organisation and workforce of the investment required to grow productivity and good quality work.

Those presenting at the hearings have provided challenge across and support for a number of areas of the application as currently drafted. It has recently been reported that Britain is 15 years into relative economic decline. Weak productivity growth has led to flattening wages with sluggish growth in income with growth in real wages falling to below zero in the 2020s.

**Two decades of evidence shows that air transport growth runs counter to the interests of the UK's domestic tourism industry:**

Productivity growth in air transport has not translated into increased wages; after considering inflation, wages in air transport were significantly lower in 2022 than they were in 2006. This wage squeeze has been felt exclusively by middle and lower-paid workers, with real wages at the top seeing real-terms growth. Overall, between 2008 and 2022, air transport saw the largest real-terms pay decline of any sector in Britain and therefore worsened the country's wider wage stagnation problem. The gains of productivity growth have accrued to higher-paid staff and shareholders

Proponents of the sector have long argued that growth in air connectivity – and business passengers utilising that connectivity – drives improvement in various macroeconomic indicators. Contrary to the prevailing assumption underpinning the political and sectoral narratives, however, the work of the New Economics Foundation did not find strong evidence of this link in contemporary Britain.

The research presents strong evidence that in less developed and less connected nations, air capacity growth can be a causal driver of economic growth. This relationship also appears to hold for nations with a strong inbound tourism bias such as Europe's Mediterranean destinations. But in a nation such as the UK, already one of the best connected in the world, and seeing a strong outbound tourism bias, the case for growth appears to rely almost entirely on the presence of business air passengers. As net business air passenger growth has effectively ceased, the macroeconomic benefits of British air capacity growth appear to have diminished.

In fact, the NEF advocates that the government should conduct a new, comprehensive, call for evidence and review of the economic case for the expansion of the UK air transport sector in terms of passenger departure and air traffic capacity. In the light of the findings of this review, the government should consider the consistency of its air capacity policies with those of climate change, domestic tourism, and its levelling-up agenda.

It has been some time since the UK government has conducted and/or commissioned assessments of the marginal economic impact (ie the impact of growth) of the UK air transport sector (or sections of it). While there have been several aviation-related consultations and policies over the past five years including the Jet Zero Strategy and Aviation 2050, these have largely steered clear of attempting a new, comprehensive assessment of air transport's contemporary economic impact.

The overall case that economic benefits derive from air transport growth is not established. As Pot and Koster (2022) recently put it, "Airports are often portrayed as drivers of economic growth, even though the empirical evidence on this relationship is inconclusive still".

The past two decades of air travel growth have been driven by strong passenger demand for travel, the competitiveness of international tourist destinations, low ticket prices, and growing air travel capacity. The latter three factors have been supported by UK government policy. This has included a tax relief package, in which air travel receives an exemption from fuel duty and VAT which is only partially offset by the levying of Air Passenger Duty.<sup>22</sup> Additional support for growth has been provided through the planning regime, which has prioritised airport expansion over local opposition.

### **An increase in capacity is not evidence of managing demand in line with COP 28 recommendations:**

There is significant evidence of environmental damage caused by aircraft. Much research is being undertaken to find viable alternatives to fossil fuel use but the aviation industry is a long way from determining a sustainable green solution.

The most recent COP 28 stocktake indicating that the global community is not on track to achieve the goals of the Paris Agreement, further highlights the folly of committing to increased fossil fuel based air traffic capability. It recommends reducing emissions across

industry and transport. Specifically to achieve net zero, industries need to intensify energy efficiency, promote electrification, and manage demand more effectively.

**Conclusion:**

There's sufficient evidence in reports from the likes of the NEF and the Economy 2030 inquiry which suggests that the UK is on the wrong trajectory for sustainable economic growth – and that increasing the capacity of the air transport sector doesn't fit well with the right trajectory and should be reviewed.

Given the proven and significant environmental damage delivered by air travel, set against uncertain and declining economic benefits, it might be prudent to pause airport expansion proceedings until a full review of the UK's case for increasing air transport system has been completed.

**At the more micro level:**

There are so many detailed elements to the application which are worthy of challenge but I just wanted to highlight a couple of key areas which I think merit further action.

**This application for expansion is predicated on models which are outdated and have not been stress tested for scenarios which take on board latest research and evidence cited above.**

The approval process is necessarily extremely complex because of the number of stakeholders impacted and the legislative/regulatory environment in place and as a consequence considerable time has passed since the original project was evaluated. Throughout this planning and examination process it is important not to lose sight of the bigger picture and to continually assess the viability of the model on which the application is based – stress testing is a must. It will help identify the real risks to the performance, stability and reliability of the application

**A noise insulation scheme acknowledges that the public will be impacted by an increase in aircraft noise pollution as a consequence of this latest expansion:**

It should be noted that the previous schemes on offer were woefully inadequate, were provided by a preferred supplier and severely limited by cost. They were also not suitable for use on listed buildings.

Realistically there is no way to mitigate against aircraft noise or indeed aircraft blight – particularly in the summer when (even in during an average English summer) days are longer and more time is spent outside:

There is absolutely no consistency of noise levels on a day-to-day basis for local residents. Weather conditions determine the direction of take-off and landing and influence the overall level of air traffic noise. And whilst recommended practice is to build airports away from densely populated areas to mitigate against the impact of aviation noise, London Luton airport is built on a hill which On average Luton residents have historically experienced take off aviation noise for 70% of the time

There are laws in the UK which define a maximum acceptable amount of occupational noise exposure. For example during “night hours” – 11pm to 7am - where background noise is no higher than 24dBA, after 11pm permitted noise levels are 34dBA and action can ultimately be taken against the proponent. However, there is no defined limit for environmental noise, including aviation noise.

To assess the adverse impact of aircraft noise the UK government does have an established policy that the Lowest Observed Adverse Effect Level is 51dBA and 45dBA for average summer’s days and nights respectively. The intention is to make sure that noise is an important factor in planning decisions and may result in support for noise mitigation. The inspectorate’s response to and approval of the 21m passenger capacity uplift cited no significant increase in noise.

A further uplift in capacity of 50% to 32m modelled on existing modes of air transport potentially increases noise by 50%, unless newer planes are producing close to 50% less noise which based on historical noise reduction trends is unlikely. Even if we consider new air traffic models based around vertical take off and landing, early research (using prototypes) reported by the CAA suggests that aircraft noise may increase rather than reduce.

**It is not evident that the proposal has given sufficient weighting towards compensation that would potentially be payable to category 3 individuals recorded in the Book of Reference. Without including these costs and a funding solution, it is not possible to assess the financial viability of the proposal.**

A noise abatement scheme is not adequate compensation for any of those individuals living in the vicinity of the airport who will be adversely impacted by the proposed expansion included in the 2000 pages of Part 2 of the Book of Reference version 3.02, let alone the limited numbers who live within the noise contours eligible for relief.

Whilst there is a route for the Category 3 individuals to make a s57 claim under the relevant sections of the Planning Act or Acquisition of Land Act the cost to the Applicant of such claims does not seem to have been factored into the cost of development: there is either a tacit assumption that these persons will not claim or that the process is such that these claims will not be successful.

It is interesting to note that of the entries in Part 1 of the Book of Reference, the only part of the book which deals with land subject to compulsory acquisition, in excess of 90% of the land subject to compulsory acquisition is owned by either Luton Borough Council or London Luton Airport.

There needs to be more independent validation of the reasonableness of what is being proposed.