

LADACAN has consistently represented to this Examination the absolute opposition of its members to expansion of London Luton Airport on the scale proposed by the Applicant. We remain firmly opposed.

Such opposition has also been made clear by over 90% of the Relevant Representations, many of them made by people who live in the areas already heavily impacted by the noise, traffic congestion, fumes, fly parking and loss of residential amenity and reduction to quality of life caused by incentivised and accelerated growth of passenger capacity ahead of mitigation during Project Curium.

That incentivisation was funded by the Applicant, which also took credit for its influence-by-proxy on the management of the Airport even though prohibited from such management by the Airports Act, as we have evidenced. What the Applicant failed to do – and likewise the Airport Operator and also the ultimate Airport Owner Luton Borough Council – was to respect obligations to provide mitigation in parallel with increasing noise. The failure to insulate the homes of impacted families at the same pace as the increase in capacity and financial gain remains a disgrace and a contempt of the planning process. The combined failure to ensure that planning conditions were respected means that London Luton Airport has the reputation of being the UK's only major airport to breach its noise conditions so determinedly for so long, and without taking effective corrective action or suffering any enforcement sanction.

Since the effects of the COVID pandemic, there has been opportunity to build back better to ensure that London Luton Airport grew in line with its commitments, generated revenue for its owners and behaved as a responsibly run local business in developing best practice. Instead, the Applicant sought to short-circuit that process by spending hundreds of millions of pounds of public money in a way which many local people regard as reckless and irresponsible, banking the future of Luton on one asset rather than investing in genuine and effective diversification.

The proposed additional burden of noise – characterized not only by contours but also by numbers of individual noise events – would fall mainly in the night time period 23:00-07:00, where most harm is done to people's health through loss of sleep and awakenings. The Overarching Noise Policy statement emphasises the importance of explicitly recognizing the additional health impacts of night flights. Yet when requested to consider capping the harmful shoulder period flights the Applicant merely argues it has the right to permit airlines to achieve their commercial objectives in the way which suits them best.

That right, it claims, is bestowed by the government's "Making Best Use" (MBU) policy. However, that policy is absolutely clear that MBU is not a carte blanche for airport capacity expansion:

*"The government is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have negative as well as positive local impacts, including on noise levels. We therefore consider that any proposals should be judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations. This policy statement does not prejudice the decision of those authorities who will be required to give proper consideration to such applications. It instead leaves it up to local, rather than national government, to consider each case on its merits."*

It is for the ExA to undertake that careful weighing of all relevant considerations while formulating its recommendation. We respectfully request the ExA also to consider the precedent this proposal would set should it be recommended for approval, given its context and recent history.