

Ms Jo Dowling
Lead Inspector, Luton Airport Expansion Project
c/o Planning Inspectorate
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Dear Ms Dowling

The Harpenden Society ("the Society") believes the grant of any planning permission to Luton Rising ("LR") has to pass two key tests.

Firstly, there must be a reasonable likelihood of the project being completed. Secondly, there needs to be a clear and unequivocally evidenced balance between the economic benefits from the project and the environmental harms communities will suffer throughout the project and thereafter.

Dealing with the first test, based on LR's submissions to the Examining Authority, we have absolutely no confidence that the project will be completed as no-one, at the close of the examination, has indicated that they are prepared to commit, financially, to the expansion of Luton airport in the near term or the long term.

Furthermore, the key variable underpinning the whole project, namely substantially increased passenger demand at Luton airport, is subject to considerable uncertainty as we and other Interested Parties have repeatedly highlighted.

The most recent admission concerning the speculative nature of demand growth is LR's assertion that the project is not viable if a limit is set on early morning shoulder period movements. Dismissing a well-evidenced proposal from the Host Authorities that the early morning shoulder period limit should be no more than 8,829 (since amended slightly), LR assert that such a limit would curtail growth to 22-30 million passengers (with LR stating the lower end of the range was more likely).

LR made this claim despite the fact that the existing early morning shoulder period limits have not been reached and aircraft movements in the early morning shoulder period have grown at the same rate as movements over the rest of the day since Project Curium started, yet growth has been substantial (approximately 74%). Furthermore, the Host Authorities, in their evidence, pointed out that Stansted airport managed on a similar early morning shoulder period limit to the Host Authorities recommendation, yet the airport caters for considerably more passengers.

Given such highly speculative and unevidenced claims (merely experts assumptions that contradict reality) from a "top down" and "non-airline specific" approach to modelling, it is hardly surprising that potential investors, including the current airport operator, are not rushing to commit resources to LR's expansion project.

With respect to the second test, we and other Interested Parties have demonstrated that many of the economic benefits LR claimed were attributable to Luton airport's growth, past, present and future, in the Need Case, were unsupported by any evidence. We also questioned whether the employment and GDP modelling was realistic, as the airport's growth over the previous 9 years has not had any noticeable effect on employment and GDP in either Luton, the Three Counties or the Six Counties (the latter two, unsurprisingly, because Luton airport is a very small component of total

employment and GDP) despite Project Curium's claims to the contrary (LR dismissed this as being due to differences in methodology – a full analysis of what had happened would have enabled an informed opinion. Instead we have a new methodology that makes correspondingly large claims, similarly on a "gross" basis). If demand is constrained, as we expect it to be, employment and GDP growth will not reach the levels claimed.

The environmental harms do not grow in line with the airport's growth. Many of them have an upfront and permanent effect.

Noise, which is a particular issue for local communities, as evidenced by the significant number of objections from communities surrounding the airport, will hardly change by the end of the project (having initially reduced as fleet modernisation has a positive effect and growth is limited until the 2nd terminal is brought into operation) and there is no obligation on LR to reduce noise thereafter, only a pious hope that circumstances will facilitate a reduction (communities aren't holding their breath). The long term noise limits will end up being barely below the 2019 actual limits but substantially above the P19 long term noise limits (the decision on which represented a balanced outcome as the long term limits of Project Curium were respected, indeed very marginally improved).

Communities, to put it mildly, feel cheated by this potential outcome, all the more so because, throughout the examination, LR has steadfastly refused to modify the noise limits (until the miniscule reduction in the last week) to reflect the evidence that we and other Interested Parties have submitted identifying likely overstatements in the calculation of the "reasonable worst case" outcome together with LR's failure to consider reasonable alternatives, such as reducing private jet movements.

LR's claim that it needs "flexibility" is not an incentive to reduce noise where possible, as policy requires, and also gives rise to questions about the credibility of an approach to noise (and other effects) that is "top down" and "non-airline" specific. As we have intimated, Luton airport's poor infrastructure (short runway, poor existing terminal facilities and congested surface access) make it an extremely unattractive base for any airline other than the three main low cost airlines at the airport presently.

To cap it all, LR has tried to abolish all the existing noise controls as they would put a brake on noise in the critical night period, a period which the government acknowledges is increasingly sensitive. What is particularly galling is that LR's evidence that early morning shoulder period limits would inhibit growth has no evidential foundation.

Whilst we've concentrated on the environmental impact of most relevance to our community, other Interested Parties have made similar representations in other areas and have essentially received a similar anodyne response from LR.

As a result, we do not believe LR has met the second test, achieving a clear and unequivocally evidenced balance between the project's anticipated economic benefits and the undoubted environmental harms.

In conclusion, the LR DCO fails the two key tests it should pass if it is to be consented.

Yours sincerely

The Harpenden Society