

**From:** [REDACTED]  
**To:** [Luton Airport](#)  
**Subject:** Development Consent for the Proposed London Luton Airport Expansion  
**Date:** 30 August 2024 18:23:00

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Dear Planning Inspector,

**Data from an independent Eurocontrol indicates that London Luton Airport ranks among the worst-performing major UK airports in terms of Noise and CO2 emissions. The proposed expansion must not be permitted until LLA addresses multiple concerns about its operation.**

I am writing in response to the proposed London Luton Airport Expansion which closes on September 6, 2024. I feel compelled to raise significant concerns regarding LLA operation and the application for further expansion. I have serious concern about:

**Aircraft Noise:**

An independent Eurocontrol report has identified London Luton Airport as the worst in the UK for aircraft noise, with the lowest percentage of level flights below FL75 (approximately 7,500 feet) and the second worst for fuel efficiency after Gatwick.

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The detrimental impact of aircraft noise and pollution on residents' health and wellbeing—causing hearing damage, sleep deprivation, stress, and anxiety—is well-known to aviation authorities including CAA. The loud noise from air braking and the speeding of aircraft arriving to LLA is causing serious problems for the people living under the flightpath. LLA is known not address. Further expansion, implying more flights, more noise, and more disturbances will cause untold damage to the well-being of people impacted by LLA operation.

**Environmental Damage:**

According to the UN Environment Programme ( <https://www.unglobalcompact.org.uk/scope-3-emissions/>) Scope 3 emissions account for 70% of carbon emissions from business activities. The greenhouse gas (GHG) emissions from Scope 3 related to Luton Airport's operations were entirely excluded from the AD6 application and I suspect has been excluded from this application too. GHG emission from Scope 3 is part and parcel of business like LLA. A basic analysis shows further CO2 emissions hindering the government's net-zero targets. For example, a Boeing 737 or Airbus A321 uses 3 to 5 tons of jet fuel per hour, producing 9 to 15 tons of CO2e per hour. Of the GHG emissions from jet fuel, 70% is carbon dioxide. Only 30% of CO2 emissions are absorbed naturally over 30 years, 50% disperses over several hundred years, and 20% remains in the atmosphere for thousands of years. This is clearly incompatible with the net-zero plan and the global warming challenges facing all of us. Also, I believe Sustainable Aviation Fuel (SAF) is currently unrealistic and unsustainable, as it competes with food production. Further expansion of LLA should be

delayed till solution for a sustainable aviation fuel is found.

### **Health Impact:**

According to a May 2023 report by the British Medical Journal, 90% of children breathe in PM2.5 particles, and 16% of deaths among children are attributable to pollution. The role of PM2.5 and ultrafine particles (UFPs) in causing respiratory and lung cancers, cardiovascular disease and possibly meningitis is well known. Further expansion of LLA using fossil fuel will certainly causes more health problem and add cost to the national expenses.

### **Economic Impacts:**

While I understand the employment benefits the aviation industry can provide, particularly in creating low-paid jobs, data from the New Economics Foundation (<https://neweconomics.org/2023/07/losing-altitude>) indicates that the net loss from the UK aviation industry was £44 billion in 2015. Essentially, we are giving £44 billion annually into the hands of foreign owners of Ryanair, Wizz air, easyJet and organizations at the expense of the wellbeing and health of our own population, not to mention the additional burden on the NHS as result deterioration in health and wellbeing.

Given the environmental and health damages caused by the aviation industry including LLA with little or no discernible financial benefits to the nation further expansion of LLA should be avoided.

### **Recommendations:**

Delay further expansion of LLA till:

- Halting Luton's expansion until a solution to aircraft noise and sustainable environmentally safer and compatible fuel is found.
- Preventing low-cost airlines from damaging residents' health, degrading the environment, and causing pollution without justifiable economic benefits.
- Banning stepped descents and air braking that causes howling noise and significantly disturbing residents.
- Banning or heavily fining aircraft that generate excessive noise due to their old age or poor design.
- Banning late-night and early-morning flights.
- LLA Reports its emissions from Scope 1, 2, and 3.
- Establishing an independent body to oversee Luton's monitoring, compliance, and complaint management.
- Mandating monthly public reporting of Eurocontrol-standard metrics for LLA, including noise and CO2 efficiency.
- Developing a sustainability plan for aviation fuel and LLA operations.
- Recognizing that the impact of aircraft noise is much greater in rural areas than in towns and cities due to lower background noise levels in rural settings.

Yours sincerely,

S Rostami

[Redacted signature]