

From: [REDACTED]
To: [Luton Airport](#)
Subject: Application by London Luton Airport Limited Seeking Development Consent for the Proposed London Luton Airport Expansion
Date: 04 September 2024 16:42:53

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Dear Transport Infrastructure Planning Unit,

Thank you for your invitation to comment on the above application by London Luton Airport Limited (LLAL).

1. Contrary to CAA, NATS and LLAL protestations that it did, the AD6 change process did not comply with regulations and guidelines with regard to informing the affected population, fully engaging with residents and properly addressing feedback. This application, similarly, has not been sufficiently advertised to the communities which would be adversely affected by it.
2. The AD6 flight path change currently put into effect has not been properly implemented, in that it is not using the Bedford stack as was approved, but rather routing aircraft in tortuous flight paths in order to align with Luton runways, all of which could have been avoided by choosing a more direct flight path corridor into LLA in the first place. In addition, an option to stack over the sea was not considered.
3. As a result of the flight path change, residents in peaceful rural villages over a very wide geographical area are already being severely adversely impacted by significantly increased aircraft noise. This includes aircraft flying more frequently, later into the night / earlier in the morning, and at lower altitudes than provided for in the change plan.
4. It is wrong for CAA/NATS/LLAL to compare the immediate and intrusive aircraft noise pollution levels caused by the changed AD6 flight path into LLA over peaceful rural villages, where there was previously no commercial aircraft noise, to the marginal increases over communities where flight paths into LLA already existed.
5. Reject Luton Airport Stacking (RELAS) has completed a report on flights into LLA and has compiled good evidence that LLA has been misrepresenting the facts and/or drawing erroneous conclusions in its AD6 airspace change Post Implementation Review (PIR).
6. LLA is the worst performing major airport in the UK on measures such as noise pollution, CO2 emissions etc and the AD6 change results in increased fuel consumption.
7. This application for LLA to expand its operations to double the number of flights it is currently permitted would clearly cause more CO2 emissions and fuel consumption and substantially increase the number of flights over peaceful rural villages, making aircraft noise pollution intolerable for those communities. It is not that there should be less flights, but that there should be no flights.
8. Based on CAA/NATS/LLAL's failure to comply with the AD6 change process regulations and guidelines, or adhere to the AD6 change plan provisions, there can be no guarantee that LLAL will respect any planning conditions required should the expansion be approved.
9. In principle the LLA proposed expansion cannot go ahead without the AD6 change. A cynic might suggest that LLAL is hoping the expansion will be approved so they can use that to persuade CAA/NATS to confirm the AD6 flight path change.
10. I respectfully request that you reject this application. Failing that, please at least postpone consideration of the application until the AD6 flight path decision has been made.

Thank you for taking these comments into account.

Yours faithfully,

John Garnham
[REDACTED]