

**The Stapletons, Parknasilla, Southern Green, Rushden,
Nr Buntingford, Hertfordshire, SG9 0SP**

Email: [REDACTED]

Case Reference: 20038144

The Department of Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Sent by email 13th October 2024

CC: Chris Hinchcliff MP

Dear Sirs

We are writing to formally object to the expansion of Luton Airport from the current 19M passengers to the proposed 32M passengers for a range of reasons.

On a personal level, our household has been hugely impacted by the imposition of the proposed new airspace change – AD6 implemented by Luton Airport and NATS in 2022, with **no consultation**.

Since 2022 we have researched the Cap1616 procedure and Luton expansion plans. Based on our findings, it is clear the motivation for the airspace change is directly aligned to expansion plans NOT the public safety message which was actively promoted ie separation of Luton and Stansted traffic.

The purpose of AD6 is to provide an area where aircraft can be stacked – prior to landing at Luton. The 60% increase in traffic being serviced by the existing 2 runways will create an incessant stream of aircraft being “held” before landing capacity becomes available, with the inevitable noise nuisance and pollution for those on the ground.

We have learned the AD6 process commenced in 2018, however, we were only made aware of this change via a leaflet in 2022 (**one month** prior to the change). This stated 70% of Luton arrivals to runway 25 would be flying directly over us at 4,500ft.

Our home is blighted by noise, greenhouse gases and particulate pollution. We are located in a Conservation area and the impact aircraft intrusion has caused to local wildlife and the rural environment is severely detrimental.

We support the arguments against airport expansion submitted by LADACAN and as a member of the Steering Committee for RELAS we refer you to the RELAS AD6 Stage 7 Common Submission V1.0 (you have already received a copy) which provides evidence regarding failings in the process surrounding AD6.

Climate Emergency and National/International Obligations

Permitting the rapid and unchecked expansion of the aviation industry is not compatible with legal or moral obligations under the Climate Change Act. The Climate Change Committee

(CCC) have highlighted failings under the 2019 report to achieve the statutory target of net zero emissions by 2050 is falling behind and is widely known to be currently unachievable.

Aviation remains the fastest growing source of Green House Gas emissions and to permit any expansion of Luton Airport is in direct conflict with CCC recommendations and net-zero.

The expansion of LLA is neither “sustainable growth” or “sustainable development” but public messages are being promoted indicating sustainability and “green” credentials. Luton Airport was recently reprimanded by the Advertising Standards Authority (ASA) over such misleading messages.

The leaflet we received was misleading – using a public message of safety to hide the real motivation for the airspace change – expansion.

In July 2024 a legal letter was issued following a precedent setting judgement against KLM over airline sustainability advertising, bought by Client Earth. A total of 71 airlines received this letter (including Ryanair, Easy Jet and BA) which will prevent the promotion of climate promises, while continuing to pollute with more fossil fuel.

An EU-wide complaint by the European Consumers Organisation (BEUC) has resulted in support for a standstill to current growth at Schipol Airport.

On Tuesday 1st October 2024 The Independent published an article calling for action based on the UK’s “absurd” use of private jets, following research commissioned by Greenpeace and carried out by the German based T3 Transportation Think Tank. This clearly illustrated the huge number of private aircraft to holiday destinations, with the volume in the UK being higher than that of any other country.

The outbound flights alone generate 67k tonnes of CO2.

Our climate emergency commitments cannot be met by the travel sector by 2050 if an unlimited growth in flying is permitted. Carbon offsetting is not a realistic response as this will not address historic carbon emissions or global warming. In the current absence of suitable sustainable aviation fuels, the 2050 targets are unobtainable WITHOUT reducing growth in air traffic.

Noise Pollution

Luton airport is located in an area with numerous large towns and cities which are already suffering the impact of noise pollution. The expansion of the airport will see a huge increase in noise nuisance covering areas of countryside across Hertfordshire, Bedfordshire and Cambridgeshire as a direct result of the AD6 airspace redesign.

Aircraft will be stacked and then funnelled into an increasingly small airspace to prepare for their approach to the runway, rendering residents subject to a higher concentration and frequency of flights and intensity of noise and pollution.

Vast swathes of countryside have already been seriously affected by AD6, experiencing huge frequencies of low flying aircraft at altitudes below 5,000ft.

AD6 is not compatible with the Government Airspace Modernisation Strategy.

The 60% increase in flights (103,000) will result in up to 240,000 flights a year – the majority of these will seriously affect rural communities across areas of countryside in Hertfordshire, Bedfordshire and Cambridgeshire if the AD6 airspace change/expansion is permitted.

The noise uplift against the ambient noise of the countryside is far more intrusive. Rural communities, where residents choose to live for the tranquillity it affords, are severely impacted.

Thousands of residents will find themselves within “significant noise level contours” as the noise footprint is allowed to grow.

Airport Noise Action Plans are largely meaningless, with noise levels benchmarked using a 16 and 18 hour Leq, diluting the overall effect of noise impact. Calculating average noise does not provide anything which can be regarded as a meaningful quantifiable figure reflective of the level of impact to those on the ground.

The mental and physical health impacts associated with constant exposure to noise cannot be underestimated, with sleep deprivation being a major concern, together with respiratory illness and cardiac events.

The expansion proposals do not comply with the National Planning Policy Framework 2019 provisions on noise by new development (Para 180a):

“To mitigate and reduce to a minimum other adverse impacts from new development and avoid noise giving rise to significant adverse impacts on health and quality of life,”(para 180a)

Infrastructure Considerations

Huge infrastructure investment will be needed in order to upgrade road and travel links in order to service the airport alone.

Traffic congestion on both main roads and approach roads will create constant gridlock in and around the area severely impacting local residents of Luton. Predictions are traffic will soar to an estimated 5.5million vehicles (circa 14,000) per day as the majority of travelling individuals arrive at the airport by car. Traffic impact will be worse during peak times.

In addition, circa 8,000 car parking spaces will need to be provided.

Residents and school pupils in and around Luton, Hitchin, Stevenage, Baldock, Whitwell, Welwyn, Codicote, Dunstable and St Albans will all be subject to damaging increases in levels of air pollution.

The DART railway does not provide sufficient capacity and the expenditure on this particular infrastructure project demonstrated poor fiscal management and far exceeded budget.

Infrastructure funding needs to be directed towards projects which will be of greatest benefit to the population – addressing decades of under investment in schools, hospitals and public services.

Public Health Concerns

Irrefutable public health concerns are associated with long-term exposure to both noise and air pollution, which must be given significant weight when assessing the expansion of LLA.

A report by the Institute of Health Equity highlights many of these issues in their document “Reducing Health Inequalities In Luton: A Marmot Town”.

Luton town is known to have serious issues regarding health equity “the town is the worst of any large urban area in the UK in terms of dispersal of emissions, leading to poor air quality. More than 6% of all deaths in Luton in 2020 were estimated to be related to long-term exposure to particulate emissions”. The escalation of respiratory illness and increased mortality will be a direct result of airport expansion due to the huge increase in particulate pollution.

Pg18 Creating and Developing Healthy Sustainable Places and Communities highlights:

“safe green spaces, clean air”

Pg 19 Recommendation:

“Introduce a clean air zone”

Pg 24 Pursuing Environmental Sustainability and Health Equity Together

The key messages are based on the need for clean air “Plans to expand Luton Airport are difficult to reconcile with reducing carbon emissions”

Pg 25 Recommendation:

“Align health and climate goals”

Section 3 of the report highlights the Social Determinants of Health. These have been identified as

- Healthy and sustainable places and communities
- Strengthen the role and impact of ill health prevention
- Environmental sustainability

All of which are non-compatible with airport expansion.

Economic Issues

The purported economic benefits of airport expansion have been called into question and are now widely regarded as being out of date.

The boom in air travel has failed to increase UK productivity or GDP growth - rendering the aviation industry and government claims in doubt. A peer-reviewed document published by The New Economics Foundation (NEF) in July 2023 provides compelling evidence that aviation has the lowest job and value creation potential.

The market has changed significantly and the proportion of passengers flying for business in 2022 (1 in 6) was half what it was in 2013 (1 in 12) the business travel market has collapsed in the last decade and working practices have changed since Covid.

Working practices are likely to continue to change, with a trend towards reducing the need to travel.

The number of airport jobs are lower in 2023 than in 2007 making aviation the sector with the lowest job value and creation potential in the UK. Those working in the aviation sector have seen the biggest post-financial crisis decline of any sector in the country.

Increased use of technology will continue to contribute to fewer jobs being available.

The report highlights a travel spending deficit of £32BN flowing out of the country – this drain is felt exclusively outside of London and the South East, exacerbating UK regional inequality and damaging the domestic tourism sector.

The main financial benefit of any expansion will be delivered to the Spanish owner of LLAOL, through layers of multinational companies from Ireland, Hungary and Greece, which appears in itself questionable.

Local residents will see none of these benefits but will be paying for them through a deterioration in their quality of lives, the environment and ultimately their health.

The forecasts of 16,000 new jobs as part of the expansion are overstated against the current economic background. There is no proven linear relationship between growth and local jobs - some predicted growth may happen independently of the expansion proposals.

From 2010 – 2018 passenger increases at LLA increased by 90% (8.7M to 16.6M) but job increases were only 26% (8,200 to 10,400) a proportion of which being part-time. This is not compatible with the previous forecast benefits promising 700 jobs per mppa but delivering circa 250 jobs per mppa.

Proposed LLA expansion statistics are not based on “whole-time equivalent” employment, resulting in an over-inflation of reported employment opportunities.

The second runway at Manchester initially forecast 55,000 jobs, however, when this was reassessed the number was found to be less than 6,000.

Loss of Countryside/Recreational Land

Airport expansion will have significant detrimental impacts on Wigmore Valley Park – an established park and nature reserve, with the loss of Wigmore Valley County Wildlife Site and a second wildlife site seriously affected.

Residents will lose access to an area which provides much needed open space for recreation and interaction with nature. Access to green spaces is proven to offer many therapeutic mental and physical health benefits which are well documented and need to be prioritised, especially against the known background of health inequality among the local population.

Personal Impact Statement

We have lived in [REDACTED]. I am retired and my husband approaching retirement. Our home is a Grade 2 Listed Cottage. In 2018 we discussed our longer-term retirement plans and decided to remain in the family home and invest in improvements. Since 2018 we have invested [REDACTED] into improving our home and garden. We have also built an annexe for our elderly father as we are his main carers.

If we had known about AD6 in 2018, our discussions would have taken a **very different direction**, we would not have invested in our home and would have chosen to move instead.

For 2 two years we have been forced to live with the impact of AD6 the incessant noise, pollution and sleep deprivation. The stress associated with the possibility of being incarcerated in our own home and unable to move away is unbearable.

Our quality of life has deteriorated immeasurably which has [REDACTED] [REDACTED] for our retirement have been rendered useless.

Since the imposition of AD6, Stansted departures have changed – huge 747/737 aircraft directly over our home, creating surround-sound thunder. The reason given for AD6 by LLA was one of safety – the fact is there are now more aircraft in closer proximity than ever before, 2 or 3 in plain sight (and sound) often crossing over our home simultaneously.

We are awoken at 6:00am every morning by Stansted departures at circa 8,000ft, followed by Luton arrivals from circa 8:00am at 4,500ft. This pattern continues all day and night, often in sustained bursts every 2 minutes for hours.

Aircraft noise can be heard from **every room** in our home (even when windows are closed). The noise drowns out normal conversation in the garden and has ruined any enjoyment in our family home. Our quality of life has been utterly destroyed.

The noise is so significant that family no longer wish to visit for the weekend. [REDACTED] [REDACTED] has to be comforted by the noise as he is worried “a storm is coming”.

Our home is now designated as a Level 1 Noise Nuisance Priority under Government Regulations.

It is blighted, devalued and impossible to enjoy due to incessant noise nuisance, constant disturbed sleep, [REDACTED] and sleep deprivation, particulate pollution and visual intrusion as aircraft fly directly over our home, garden and the fields at the rear of the house – often every 2 minutes, which if expansion is permitted will only get worse.

This traffic is not following the flight paths submitted to the CAA in the CAP1616 documentation.

Despite protracted correspondence with Luton Airport, Stansted Airport, NATS, The CAA and my former MP Sir Oliver Heald we have failed in our efforts to be heard.

Having reviewed the CAP1616 in detail there is clear evidence of failings within the CAA to robustly manage their own protocols. These relate, in particular to the consultation requirements and the lack of independent governance relating to information submitted by the change sponsors for the Post Implementation Review.

CAP1616 v.4 Appendix p175 Consultation and Engagement

Defines Consultation as follows: A formal process seeking input into a decision undertaken in line with Gunning Principles and Government Guidance.

Engagement states as follows: Best practice ongoing engagement to ensure that airspace change proposals are received by an informed, engaged audience able to effectively feed-in their views.

The Gunning criteria for public consultations as laid out in 1985 are:

Gunning Principle 1: Consultations must occur while proposals are still at a formative stage

Gunning Principle 2: Sufficient information needs to be supplied for the public to give the consultation “intelligent consideration”

Gunning Principle 3: That adequate time is given for the consultation and response.

Gunning Principle 4: That the product of consultation is conscientiously taken into account when finalising the decision.

The CAA has failed to ensure change sponsors have met the requirements of the Gunning Principles (1-4) but are stating their acceptance of the (flawed) consultation procedure. This cannot be accepted and creates a sound case for judicial review.

In reality, numerous postcodes including our own [REDACTED] were excluded from the Consultation stage of the AD6 process, despite change sponsors being fully aware of the impact this change to the arrivals into Runway 25 would have.

AD6 totally changes the approach into Runway 25 and funnels increased traffic into an ever-smaller airspace and concentration directly affecting our postcode.

NATS are using “expediting” pathways when not necessary, creating a “fly anywhere” approach which results in huge convoys of aircraft being sent along the same route.

The CAA failings mean we have been denied the right to make an informed decision about where we can choose to live happily and healthily.

If the Gunning Principles had been followed, we would have moved from our family home of 30 years. We live in a rural area to enjoy the peace and tranquillity of the countryside – now we are trapped on an airport runway.

The CAA have confirmed AD6 has met the necessary objectives for approval following the Post Implementation Review – before any decision has been made on the DCO, thereby the implication is the DCO is a foregone conclusion and the expansion will be granted.

This calls for a Cabinet Review at the very least.

Conclusion

There are compelling and far-reaching reasons why the expansion of Luton Airport cannot be justified.

To expand the most polluting form of transport when there are pressing challenges to be met in relation to the Climate Crisis and obligations under the Paris Climate Agreement and the UK Climate Change Act cannot be permitted.

The cost vs benefit of infrastructure investment in airport expansion must be reassessed urgently. The majority of air travellers are holiday-makers, rendering air travel a “want” not a need.

One 13th October we were made aware that after 5 years of refusing to sign off the 2018/19 accounts, the former LBC accountant Ernst and Young have issued a Public Interest Report over issues concerning how the DCO was funded and the valuation of the airport, stating “the inability of the authority to produce materially accurate financial statement should be brought to the attention of residents of Luton”. We await the outcome.

A more sustainable approach would be to limit the overall numbers travelling, retain local spend and work towards supporting the UK based tourism industry - creating more work and employment opportunities all without impacting climate change.

Infrastructure investment necessities should be directed towards addressing the decades of under-investment in healthcare, schools, education, social care and sustainable road and rail networks, all of which are urgently needed.

The most abhorrent outcome would be the granting of the DCO. If this is the case we will be seeking voluntary purchase, removal costs and a suitable level of compensation for being driven out of our beloved family home of 30 years.

Yours sincerely

Debra Stapleton

Paul Stapleton