

Overview

Of the 1,603 RRs submitted, while the overall detail is variable, many are detailed and carefully researched, and relevant to the specifics of the Application and its documentation.

Over 90% of the RRs oppose the Application, for reasons which span most of the range of issues and relate in part to the locality of the writer and in part to the global issue of climate change.

It is unfortunate that the submission system removes the line-breaks from pasted text and runs everything together into an almost unreadable chunk of text with no formatting – hopefully this can be rectified.

Non-statutory organisations

Of the 78 non-statutory organisations which responded, there were some 37 resident and community groups of which the great majority (35) were in opposition; 21 charities funded by Luton Rising which (probably unsurprisingly given the funding difficulties the charity sector faces) were all in favour. The remaining 20 were local and national businesses and business forums of which 16 were supportive – again most businesses would support the potential prospect of more jobs.

It will be for the ExA to assess the difficult nuance between support which is supportive of the airport being an important economic driver for Luton in any case, and support which identifies specific benefits from the Application to increase capacity, and genuinely considers those benefits to outweigh the impacts and the concerns which even those in support raised about climate change.

An application which overtly labels itself as sustainable and green, even though it argues for an increase of capacity which would add to carbon emissions, air pollution and environmental impacts, may encourage uncritical acceptance of the proposition that more money and more jobs come with no downsides.

Clearly nobody in the charity sector would be likely to “bite the hand that feeds” by criticising a key donor, and the expressions of thanks make that point. And their aspirations for the overall betterment of Luton will no doubt be shared by many who oppose this particular Application – it’s a matter of how, not whether such betterment can and should be achieved.

Overall, the sums donated by Luton Rising to charity will continue regardless of whether the Application is granted or not, as the Community First documentation makes clear. And those sums are small in total compared to the expenditure on DART.

Businesses and forums may also have accepted the proposition that the airport can “expand in a green and sustainable way” and some have used the response as an opportunity to raise specific concerns within their supportive statements. Other businesses do however see this proposal as a threat to their livelihoods.

Set against these are the community groups representing local people who individually feel powerless against growing erosion of quality of life whilst unable to achieve any meaningful compensation – many having lived in the area for a substantial time and have experienced an increase in such impacts. These include the inconveniences of knock-on effects such as fly parking and more crowded roads.

Specific Representation

The RR by LLAOL, the Airport Operator, is interesting in that it confirms the possibility of expansion without the need for a second Terminal:

“Terminal capacity build out – Expanding capacity is critical to growing the airport and we are pleased the Applicant has taken on board our ideas and approach to how the existing operational terminal can be

expanded. This approach will minimise disruption to the airport and local community (re: construction impact), whilst allowing for more passengers to use the airport."

This creates a potentially less impactful future pathway in which, having delivered the mitigations required by Project Curium, and reduced noise impacts in line with policy, the Airport might take a further modest step.

Its praise of the enhanced Noise insulation Scheme is interesting:

"Enhanced Noise Insulation Scheme – as part of the DCO plans we agree that it is vital to reduce the adverse impacts of growth on those most affected, particularly by noise. We are therefore supportive of, and committed to, delivering the proposed Noise Insulation Programme (which has been significantly enhanced versus the current scheme) in conjunction with the Applicant."

These aspirations would be more believable had it shown the same enthusiasm to roll out the existing scheme at an accelerated pace, to match its enthusiasm for releasing flight slots at an accelerated pace.

The un-settled nature of discussions between the parties is evidenced by its further comments that:

"Subject to approval being obtained and subject to suitable commercial arrangements being agreed with the Applicant, LLAOL is committed to the development and growth of the airport. Negotiations are ongoing to reach a suitable commercial agreement with The Applicant, which need to be in place prior to development commencing. Nevertheless, LLAOL may wish to make representations during examination including but not limited to:

- Matters concerning airport operations;*
- Matters concerning the extant Concession Agreement;*
- Developments to the DCO Drafting and S.106 Agreement;*
- The extant planning position at the airport."*

"We are therefore supportive of this Application and to working with the Applicant to deliver it post approval, subject to reaching commercial agreement."

Clearly such details would need to be tied down not just before development commences, but during this Examination. One senses a commercial bargaining position being utilised to the full.