

We strongly oppose the Application because:

Substantial expansion of Luton Airport would be out of proportion with its location and surrounding area, with claimed benefits outweighed by harms.

It is inconsistent with Policy requiring noise levels to fall as capacity expands, and would not mitigate noise especially at night.

Noise insulation is not mitigation; properties insulated to a lower standard are not upgraded; people in Caddington and Pepperstock are inadequately protected.

There is no carte-blanche for airport expansion.

Financially incentivised accelerated growth at Luton Airport since 2014 led to noise contour breaches 2017-2019 in which industry benefited at the expense of communities, creating a planning imbalance.

Development work, noise insulation, and noise mitigation required by Project Curium remain incomplete.

LAeq contours do not adequately characterise noise impacts, especially at night when 70% more flights are proposed.

Noise performance of aircraft not yet flown at Luton cannot accurately be modelled.

Flights would still be held low for many miles due to inefficient airspace.

The consented 2019 baseline fleet is wrongly calculated.

Noise modelling is based on mixed quality data; spot noise predictions do not agree sufficiently with measurements even after adjustment.

A321neo aircraft create more air noise than anticipated and next generation aircraft are likelier to be more noisy, not less.

Public money has funded the application so a WebTAG analysis of harms would be appropriate.

The NEDG work was curtailed before completion and without adequate consultation (APP-111 appendix B).

Altered “early warning” thresholds in GCG would not now give adequate time for correction.

There is insufficient independence in GCG governance to give future certainty.

Surface transport and rail services are inadequate.

Wigmore Valley Park and farmland should not be sacrificed for airport expansion.

GHG forecasts are substantially lower than in the PEIR.

The Jet Zero Strategy is wrongly treated as policy.

It is unclear how the development would be funded.