

We strongly oppose the Application because:

It has been submitted before completing the development and in particular noise and carbon emissions mitigations required by the current permissions for Project Curium, which runs until 2028.

Significant amounts of public money which could otherwise have been used to alleviate poverty in Luton and create a more diverse, resilient and sustainable local economy have already been invested in capital works (eg DART) to facilitate this project, not respecting government conditions for COVID support.

Other apparent facilitations such as the transfer of Wigmore Valley Park to the Applicant and approval of a dual carriageway access road have taken place ahead of any DCO permission.

The Need for the Application is not adequately justified when the economic benefits of Project Curium are still in scope and there exists a “Do Minimum” model in which Luton Airport could operate in accordance with policy requirements for balanced growth and mitigation, delivering reducing noise and emissions over time and contributing to achieving the UK’s net zero commitments.

Currently unresolved causes of health harms including the effects of aircraft noise at night, exposure to ultrafine particulates and exposure to kerosene odours would worsen if the Application were permitted.

Biodiversity would be reduced by the destruction of habitat in much of Wigmore Valley Park along with its mature hedgerows and wild orchids.

Environmental risks would be incurred in disturbing, levelling and building on the poorly documented toxic landfill site beneath the Park.

The value of preserving the residential amenity of Wigmore Valley Park in its existing location and retaining valuable arable farmland militate against further expansion of Luton Airport.

It ignores the recommendation of the Climate Change Committee for airport expansion to pause pending an overall aviation sector capacity framework to manage carbon emissions and non-CO₂ impacts.

It would create financial and economic risk for Luton in the context of increasing likelihood that demand-reduction measures will be required if aspirations to decarbonise aviation are delayed or prove too costly.

Its Climate Change assessment appears to treat the ambitions, opportunities, targets, aspirations and aims of the Jet Zero Strategy as policies, which may explain the substantial reduction in its aviation greenhouse gas emissions assessments compared to the PEIR.

It does not justify its reliance on industry achieving the High Ambition goals of the Jet Zero strategy, and appears to cherry-pick the provisions which suit it.

The assessment of noise by 92-day summer contours would be undermined by holiday travel shifting earlier or later in the year.

There are significant grounds for concern regarding the overall governance arrangements between Luton Borough Council and the Applicant, and the extent to which the Applicant has influenced the management of the Airport when not qualified to do so under the Airports Act 1986.

It is unclear how the development would be funded or whether the delivery of the project could be secured – or how any necessary remedial works would be secured and funded were the project to fail financially.

It is unclear who the statutory undertaker responsible for operation of the Airport would be post-2032 and how their adoption of the Applicant's noise forecasts, trajectory and noise modelling would be procured in order to provide continuity of noise impact control. This also applies to other environmental impacts.

There is lack of clarity over the interpretation of an important policy principle of "sharing the benefits" and over-reliance on CAA guidance as if it were policy.

Such substantial expansion of Luton Airport would be out of proportion with its location and surroundings, with the claimed benefits outweighed by the significant environmental harms, health harms, and damage to the nature and character of the area through reduction in residential amenity leading to possible blight.

It is inconsistent with policy requiring noise levels to fall as capacity expands, and does not effectively mitigate increased noise from substantially increased numbers of flights especially at night.

Noise insulation is a form of compensation, not effective mitigation, since it fails to protect people when outside or on balconies or with windows open at night.

Properties already insulated to a lower standard are not considered; people in Caddington and Pepperstock would be inadequately compensated or receive no compensation or mitigation.

We endorse the Written Representation of Michael Reddington which sets out in detail the deficiencies of the proposed noise insulation schemes.

There is no carte-blanche in aviation policy for airport expansion yet the Applicant has ignored the need for noise to reduce as capacity expands.

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 which has yet to be rectified, and which the Application would further worsen.

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

Its noise impact assessment relies heavily on LAeq contours which alone do not adequately characterise the noise impacts particularly at night, when 70% more flights are proposed.

Increasing numbers of flights would be held low at 4,000-5,000ft for many miles due to inefficient airspace design until at least 2030, needlessly adding to greenhouse gas emissions in an unsustainable way.

The method used to derive a consented 2019 baseline fleet, using which a Do Minimum noise baseline is modelled, is erroneous since it overstates aircraft movements and understates their individual noisiness.

Given that 2019 was an atypical year in many ways and the third year of unconsented noise breaches, it is inappropriate to use a 2019 baseline for the assessment of any of the environmental impacts.

Noise model validation does not deliver expected correlation between spot noise predictions and noise measurements even after adjustment. Significant anomalies remain, particularly affecting South Luton.

A321neo aircraft have been ascribed noise reduction benefits which exceed LLAOL's measured values; next generation aircraft are ascribed noise reduction benefits which are not evidenced and most unlikely to be delivered; local noise performance of aircraft not yet flown at Luton cannot accurately be modelled.

Taken together, the concerns over noise modelling significantly undermine the noise impact assessments.

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

The work of the Noise Envelope Design Group was curtailed before completion and without consultation to the required standard, which undermines the value which can be placed on a key aspect of the Application.

The noise control provisions in Green Controlled Growth are not as the NEDG recommended and would be likely to fail, with potential for breaches which either could not be remedied or could take years to remedy.

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

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

The ambient noise survey requested by the Noise Working Group appears not have been conducted in a way which would meet objectives, and may not even suffice for transport calculation checking.

The Written Representation of the New Economics Foundation (which we endorse) evidence overstatement of socioeconomic benefits.

Surface transport provisions appear inadequate: roads and rail services are already crowded; the Airport has poor east/west road links; the north/south rail network does not appear to have sufficient additional capacity; fly-parking and rat-runs adversely affect local residents.