

London Luton Airport Expansion

'Have your say during the examination of the application'

Additional Written Submission

Name: Alison Mitchell

Interested party number : 20038915

email address: [REDACTED]

Thank you for the opportunity to make a written submission. In making this response, I would like to acknowledge the follow up email I received from the Luton Airport Planning Inspectorate in response to my complaints about how lack of information about meetings and process described in exclusive technical language resulted in my withdrawing from the recent meetings. I appreciated the further detailed information that was provided as that and only that has empowered me to be able to make this written submission. I wonder how many other voices are not being heard and therefore I request a further open floor meeting.

My original request was to comment on the Examination process to make the point that the process must be inclusive in accordance with the Equalities Act and in relation to the whole geographical area that will be affected by an increase in air traffic as a result of the AD6 airspace changes.

Here is my expanded written submission.

1. Request for further open floor meeting to facilitate a wider public consultation

I submit request a further Open Floor Hearings before Deadline 1 (Tuesday 22 August).

- This Open Floor Hearings should be targeted more explicitly to the wider public and especially to groups identified as at risk in the Equality Impact Assessment including all the geographical areas that will be affected by air traffic expansion by Luton airport.
- An Equality Impact Assessment should be carried out on the Examination process itself to ensure that all groups included in the Equality Act are properly included in the Examination.

2. Equality Impact Assessment

I enquired about the existence of an **Equality Impact Assessment** as it was not available on the web site for considered as part of the examination process. I now have been provided with the links:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020001/TR020001-001122-7.11-Equality-Impact-Assessment-Revision-1.pdf> and [Annex C of the Rule 6 letter](#),

The Equality Impact Assessment recognises the adverse impact of noise on health of groups recognised under the Equality Act - Children under 16, older people, babies, pregnant women, and foetuses, and particular ethnic groups. However the report shows no mitigation for the impact on noise on these identified groups. It simply states it as a fact. This is very troubling in terms of the legislation.

- I urge the Examination to consider in depth the impact on the health of these groups, not only during construction, or in the near vicinity of the expansion but also along the flight path where people in these groups are experiencing excess noise and distress.

I was referred to [Annex C of the Rule 6 letter](#), which includes an action on noise

‘Noise • Effects of air and road traffic • Assessment and modelling assumptions including use of 2019 baseline • Night flights • Mitigation measures - including use of limits and quota counts’

I do not consider that the statement fully achieves the aim that ‘the effects of the Proposed Development in relation to human rights and equality duties are matters that will be taken into account as overarching or integral components of the initial assessment of principal issues by the Examining Authority when they consider the application.’

This request for information should include

- Impact on different protected characteristic groups
- A wider geographical view of the affect population, under the flight paths where significant additional and constant noise will be prevalent.

3. Rerouting of AD6 arrivals path - an important case study on impact of noise emanating from an expanded Luton airport.

I refer the Examination to the impact of the AD6 rerouting of approach flights to Luton airport on the ‘at risk’ groups identified in the Equality Impact Assessment who find themselves under the new flightpath.

From the rerouting of arrivals into AD6 airspaces over new areas north and east of Luton, it has become clear that the noise data provided by NATS for that change was misleading and superficial. Their presentation of data did not properly address the ‘human’ impact which is not only about noise level but also about constancy of noise, continuous noise in relation to low levels of ambient noise as experienced in rural communities.

- This was raised by our MPs in Parliament in debate and the AD6 impact, evidence and undertakings should be taken into account in the examination.

AD6 flight path changes provide a relevant case study of the impact of change in areas with low ambient noise which should be taken account of the Examination. I notice the examination asks only for data in 2019, whilst there is more recent data post COVID of the impact of noise in approach paths.

- I request the Examination takes into account AD6 noise impact evidence from different parties, and takes into impact on much larger populations than those local to the airport expansion.
- Any data request should require a breakdown of impact in relation to groups with protected characteristics
- Representative organisations should be consulted by the Examination.
- Luton airport should provide a noise mitigation plan to protect vulnerable groups in the population identified by the Equality Impact Assessment

4. Wider consultation and realistic data collection

I note that NATS is not providing evidence even though they have been collecting flight path information since the airspace change was introduced. In the initial NATS report for AD6, it was estimated that planes would pass over at 3 minute intervals and this has indeed proved to be the case at peak times. With the expansion of the airport we have been told by the airport that their capacity would be increased by 'filling in the gaps' between the current peaks leading to virtually constant noise under the flight path.

- The Examination should request projections of air traffic volume and frequency of overflights and compare that with the known impact of AD6 now.
- All aspects of the expansion should be considered geographically and for full 24 hour periods. The Examination will request of night flight data but the day flight data is crucial as well.
- The Examination should include a wider range of local authorities such as South Cambs where residents are already badly affected, impacting the very population with protected characteristics that is identified in the Equality Impact Assessment.
- Also contact the organisation RELAS which has carried out its own data collection and impact studies.
- South Cambs and associated councils should be consulted
- Evidence of impact for populations currently affected by AD6 should be taken into account as the number of flights increase with expansion.
- Local MPs in our area have supported constituents and joined in exposing the poor consultation. I shall be a copy of my submission to my MP, Anthony Brown.