



Friends of the Earth

**Development Consent Order by Luton Council
to expand from 18 to 32 million passengers
during an accelerating Climate and Nature Emergency**

Luton Friends of the Earth's registration to object + background 20 Jun 2023

Grounds for objection (background slightly revised) 22 Aug 2023

emailed to LutonAirport@planninginspectorate.gov.uk Reg no 20040317

Your video says “the purpose of the NSIP process is to weigh local impacts against national need for such infrastructure, in a fair, open and impartial manner.” It is our strong view, informed by science, that approving this application would have devastating adverse local impacts, and airport expansion is against national (and international) need.

It is incomprehensible to us that, following the inquiry in autumn 2022, this DCO has been accepted for yet further debate, when catastrophic impacts of expanding aviation (the fastest growing source of climate emissions) both locally and nationally have already been clearly demonstrated. The Govt Climate Change Committee, on IPCC scientific advice and amid many warnings from the UN, says there should be no expansion in UK aviation. We have no intention of “suggesting ways to shape the scheme, or to reduce impacts of extra traffic”. There must be no scheme, and there must be no extra air or road traffic.

Background

We attended the East Midlands & Milton Keynes Sub-Regional Strategy Inquiry in 2004. Any accountant would advise a balanced portfolio. The Panel of inspectors strongly advised Luton Council “not to put all its eggs in the airport basket”. This advice was not heeded, leading to considerable debt. The council then chose to spend £600,000 on a public inquiry investigating whether they should be given permission to go ahead with a development which contravenes national policy.

By contrast, the Local Government Association has said that if Luton follows good practice elsewhere, it could have 1600 green (carbon neutral or positive) jobs by 2030. We have yet to see any signs of efforts to develop partnerships that might achieve this.

In 2022 government loaned Luton Council £80m due to Covid income losses, on condition that it reduce reliance on the airport. This was more than advice – however, not only was it ignored, but the council borrowed over £500m and loaned it to its own company to promote airport expansion. At least £60m has been spent on consultants and marketing.

Luton FoE objected in 2014 when Luton Council voted to double passenger numbers from 9 to 18 million. A quarter of Luton's GPs signed our petition against this, concerned that it

would affect patients' health, but the council voted for the increase. By 2019 the 18m had been achieved, in 5 years instead of 15, with no mitigation, against promises, the Local Plan and the National Planning Framework, making Luton the most polluted town and fastest growing source of climate emissions in UK. That is totally unsustainable and unacceptable, and cannot be repeated. The obvious conclusion is that demand must be managed to reduce, not expand, the number of flights from Luton. Covid was supposed to be a once-in-a-lifetime wake-up call to change our dangerous habits. But worryingly, flight numbers are climbing rapidly toward pre-Covid levels, and climate effects are accelerating.

We founded residents' group Friends of Wigmore Park in 2017 when a threat from Luton Council was announced, and Stop Luton Airport Expansion In 2018 when the council admitted that the main threat to the park was not a business park or a dual carriageway through it, but major airport expansion, a second terminal and extensive car parks. Luton Council had been planning this secretly since 2015.

We were one of many groups and individuals objecting to the council's approval of the operator's application to expand from 18 to 19m, the subject of an Inquiry conducted by 3 inspectors in autumn 2022, which has yet to report.

It is not clear, or fair on objectors, why the identical principles of expansion, while on a different scale, are overlapping. They are both overseen by the Planning Inspectorate. Many think the Inspectors should have rejected expansion above 18 or 19 million. It would have been helpful to view and digest the conclusions of the previous inquiry. Based on national policy and the number of objections, this should have given grounds for refusal of further expansion, pre-empting the need for a DCO process.

We now find ourselves registering to fight the council's Development Consent Order to government to expand from pre-Covid 18 million to 32 million passengers.

At this first stage, we are asked for a summary of the main issues. We have not yet read, and may not had time to read, the many jargon-filled documents, which are likely to deter people from commenting. It was not even easy to find the registration form.

We are mainly concerned not with details of the plans, but **fundamentally oppose the key principle and impacts of expansion**. The national (and international) need is not for airport expansion, but for considerably less flying.

The UN and many IPCC scientists have warned repeatedly, since a key report in 2018, that the Climate Emergency is the biggest threat to humanity, and we must do all we can to change behaviours radically in as short a time as possible. 7 years has been cited as all the time we have to act comprehensively to prevent irreversible climate damage.

Aviation and road transport are the fastest growing source of climate emissions. Not to fly is the biggest single thing individuals and businesses can do to cut their carbon footprint.

'Overarching components'

achievement of sustainable development ***Virtually impossible***

effects of proposed development ***Devastating, locally, nationally & internationally***

effects of linkages/ overlap between issues ***Everything is linked***

effects of the Proposed Development in relation to human rights and equality duties

Human rights form an element in most of our grounds for objection

(achievement of good design is a given in any major project)

'Principle issues'

1 Air quality and odour (from planes and traffic) ***See 4,5,6,7 - most of our points are linked***

2 Biodiversity - Effects on existing ecological receptors including designated sites ***See 2***

3 Climate change and greenhouse gas emissions ***See 1, but most points linked***

6 'Green Controlled Growth' ***See 5,12***

7 Noise ***See 1,2,6,7,8***

8 Physical effects of development and operation – Heritage assets / landscape & visual impacts / loss of trees & hedgerows / effect on water resources, water quality, drainage ***See 2,3,10***

9 Social, economic and land-use considerations – communities/equalities/health/Wigmore Valley Park/ Safety/land use & planning ***See all points***

10 Traffic/transport – effects of construction/operation on strategic & local road networks/surface access/parking ***See 5,6,7***

We think it unreasonable for the Panel of Inspectors' report from the 2022 Inquiry, which ended Nov 2022, to be held up awaiting govt comments until 22 Aug, the date for submissions to the DCO. The first could set helpful precedents for the second. We are pleased that it was clearly stated that written representations will be given as much weight as oral evidence.

We need Luton Council's (Luton Rising's) application to be refused, sending a strong message, with an instruction backing up the government's requirement, when it loaned the council £80m, that Luton reduce reliance on the airport.

Grounds for objection

1 Climate Emergency

2 Fatal Destruction of Nature, especially one of Luton's best wildlife habitats

3 Wigmore Valley Park – a major amenity for recreation

4 Pollution: More planes means millions more road vehicles

5 Luton is the wrong place for a major airport

6 New roads against local plan (2017)

7 Car spaces and travel would increase by over 50%

8 Noise and dust would increase, cause stress and could have severe health effects

9 Effect on the Economy (Local and National) of airport-induced impacts

10 Luton's largest Landfill Site to be dug up 'at high risk' – consultants

11 DART link from Luton Parkway station will not reduce road traffic

12 Luton Rising website claims about mitigation are unproven greenwash

13 Conflict of interests - Airport income not mainly for benefit of residents

14 Jobs claims unlikely, poorly paid, and green jobs needed

15 Covid lessons not learned

1 Climate Emergency

Aviation caused 7% of the UK's emissions in 2018, and **8%** In 2019 (domestic and international flights). [REDACTED] “
The only way to avoid aviation emissions is not to fly”- Aviation Environment Federation.
[REDACTED]

Worldwide CO₂ emissions from commercial flights are rising up to 70% faster than predicted by the UN, according to an analysis. Carbon dioxide emitted by airlines increased by 32% from 2013 to 2018, according to a study by the International Council on Clean Transportation (19 Sep 2019).

Since Apr 2021 all planning must include aviation impacts from planes in the sky, not just airport ground activities, and impacts of all transport to airports. A consultant (Ricardo) appointed by Luton said they must begin their Environmental Statement / Impact assessment again - in effect it was just a 'wish list', written by another consultant (Wood). Luton's Airport Masterplan was now out of date, making approval on 1 Dec 2021 of expansion from 18 to 19m passengers invalid. Luton Council has ignored this in its DCO application, focusing on airport ground activities. It has done nothing to persuade the operator to cut 'ghost flights' when planes travel either empty or at far from full capacity.
[REDACTED]

The 2019 Antithesis report commissioned by Luton Council said that Luton should aim to cut emissions by 80% by 2030. The Tyndall Centre said this figure should be 90%. This process has scarcely begun, and airport expansion would make it impossible.

The National Planning Policy Framework requires climate emissions and noise to be reduced, not increased. We suggest Luton has failed to comply with Environmental Impact Assessment Regulations because it has not assessed the greenhouse gas impacts of burning fossil fuels on the UK's Net Zero target; and failed to follow the NPPF by not assessing greenhouse gas emissions from flights and traffic.

For 'Decarbonising Transport' (Ref 7.23) re *'govt commitment & actions to decarbonise the entire transport system in the UK'*, Luton Rising refers to vehicle fleet emissions. Yet 99% of the airport's climate impact is from planes in the sky (51%) and transport to the airport (48%), mostly from outside the borough. Luton Airport's impacts are not only local, but worldwide, yet the council acts as if it were exempt.
LLP6: iv. *Proposals for development will . . . fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or local environment (in terms of noise, disturbance, air quality and climate change impacts), and identify appropriate forms of mitigation in the event significant adverse effects are identified.'*

'Mitigation' in the form of carbon credits has been discredited.
[REDACTED]

'Mitigation' for noise and disturbance are woefully inadequate, say multiple witnesses.

Members of Friends of the Earth attended a number of Consultation events, first by London Luton Airport Ltd and later by Luton Rising. Several consultants from Arup and others admitted it was not possible to mitigate against the levels of climate and pollution emissions proposed.

The Government's Climate Change Committee, on IPCC scientific advice, says that there should be no further expansion at any UK airport. Bristol was allowed slightly more passengers, but Luton BC's intention for a major expansion to an airport sitting above a big town is on a different scale.

The UK has international commitments – the UN's Antonio Guterres said on 15 Jun that the world is sleepwalking to disaster, and must make radical emissions cuts in the next 7 years.

It's not only CO2 that fuels the climate crisis – jets emit hydrocarbon pollutants; jet trails turn into clouds, and water vapour in Earth's thin, vulnerable upper atmosphere cause 2-4 times the climate damage from CO2. [REDACTED]

The authors of a major study say "To maintain liveable conditions on Earth and enable stable societies, we must do everything possible to prevent crossing tipping points." [REDACTED]

Unlike the UK, European countries have banned internal flights. Schipol is limiting flights because of pollution, noise and climate. France and Austria only permit internal flights if you cannot do the journey by train in 3 hours. The UK is the most expensive country by far to travel by rail, and in Europe it is not much cheaper to book in advance.

Promoting airport expansion is a strong disincentive for individuals and businesses to change patterns of behaviour and try to cut their carbon footprint. Flying is a symbol, seen in the sky, of burning fossil fuels. Anyone promoting an increase in flying is on the wrong side of history.

NO action can be allowed that makes climate problems worse. All actions should be climate positive. Every flight burns fossil fuels, and will for many years. We must radically reduce this impact, and the only way is to fly less.

The DCO application runs counter to all these warnings. The time for "Improving connectivity and growth in air travel" has passed. We now have the impacts of Brexit, Covid, the Russian war in Ukraine, food banks, and acute poverty due to the 'eat or heat' energy crisis. Emissions must come down dramatically to prevent a succession of tipping points and runaway climate change, and we need to drive less, not more.

There is no funding for expansion, and most of the plans would be unlikely to begin in that period. The Climate Crisis will only get worse – so why spend over £60m on a DCO when this could be used to support struggling residents and to create green jobs for the future?

An Inquiry was held in autumn 2022 as to whether Luton Airport could expand from


18-19m passengers. One of the 3 inspectors had a specific remit on Climate Change.

Luton Council followed the government in declaring a Climate Emergency. It set an ambitious target of Net Zero by 2040, 10 years earlier than government. But all the good work in Luton's Net Zero Strategy, done already or recommended for the future, would be wiped out by the impact and scale of the same council's proposed airport expansion. A permanent local Climate Assembly is needed, as elsewhere, to involve local people.

In a Climate Emergency it is simply impossible to justify airport expansion. No one is calling for the airport to be closed, but the doubling of flights between 2013 and 2019 was unjustified and hugely damaging. The responsible thing to do is to put in place measures to REDUCE flights and promote holidays in UK, and train journeys to Europe.

Half the population never fly, and subsidise those who do, who don't care about the damage they cause. When every plane burns fossil fuels, adding to climate change and pollution, we don't have a right to fly. It will be decades before planes don't emit carbon & pollutants, and most people have electric vehicles. We should not be 'meeting demand', most of it generated by the aviation industry, but strictly enforcing 'demand management.'

We cannot rely on serious, destructive fires across southern Europe acting as a deterrent. Our future depends on aviation not growing but shrinking. Flying within Europe must be seen as for emergencies only. We would like to see councils telling residents that to stop flying is the biggest single thing people can do to cut their carbon footprint. Also to give advice on taking holidays in UK, seeing Europe by train, or experiencing other cultures, towns, villages and countryside en route.



2 Fatal Destruction of Nature, especially one of Luton's best wildlife habitats

We are a part of and cannot survive without nature. Extinctions have increased. Biodiversity is in rapid decline. Scientists have warned of a possible collapse of nature's network that provides trees, plants, fresh air and the food we eat. Our rivers and seas are in crisis. Many people learnt during Covid how important it is for wellbeing to connect with nature.

Expansion of Luton airport would destroy a vital County Wildlife Site – described as SSSI equivalent, an unusual mosaic of habitat bordered by a strip of ancient woodland, providing an important wildlife corridor – to build a second terminal and more roads and car parks. Wigmore Park was created and landscaped by Luton Council in the 1980s over the largest landfill site in the town, as the need for recreation for people in the new Wigmore estate was considered essential. Thousands of trees were planted, when only 2 million passengers a year flew from Luton.

Mature trees are vital to absorb carbon, and each tree is a habitat for thousands of creatures. Yet 2 hectares of trees in Wigmore Park would be cut down to build Terminal 2 and car parks. There is also a plan to destroy thousands of trees either side of Airport

Way, bringing noise and pollution to hundreds of front doors. No one should have their daily quality of life made worse.

Today, with 18m in 2019, the park is a vital buffer for residents of Wigmore and beyond, reducing noise and pollution from the airport and making life bearable. When the wind is in the wrong direction, even in the park, the noise and fumes from burning aviation fuel is most unpleasant.

Luton Friends of Parks & Green Spaces (an umbrella group for Friends of Parks groups across Luton, which I chair) is signed up to the National Federation of Parks Charter. This includes *“Embed effective protection from inappropriate development or use, or loss of any part of our parks.”*

Pollution, noise and light from planes disrupts wildlife, reducing ability to feed, communicate and breed. To double these effects would accelerate the decline in wildlife.

4.1.5: *‘Assessment of impacts at ecological sites has been carried out in this ES’.*

Such studies are usually a short-term snapshot, and not regularly (eg monthly from Feb to Oct) to take account of impacts on species throughout the year. Wildlife lives and dies, metamorphoses, and moves around, through the air or using green corridors including gardens. In the early 1990s the Wildlife Trust carried out studies across the town to record wildlife. This is what is actually required to assess whether increased traffic and pollution were having adverse effects. Given the health problems for humans, the result of major expansion and loss of mature trees would be to accelerate decline in wildlife ecosystems.

The National Planning Policy Framework refers to *‘how the planning system should contribute to and enhance the natural and local environment and prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution’* (Paragraph 174). The Environmental Statement by Luton Rising claims (Section 7.8) *‘to provide the mitigation that **looks to** reduce the impacts to the natural and local environment.’* This is greenwash.

3 Wigmore Valley Park – a major amenity for recreation

Wigmore is a District Park, Luton’s second biggest and most biodiverse, twice awarded by charity Fields in Trust as one of the best parks in the East of England. Luton Friends of Parks and Green Spaces, a voluntary umbrella group for Friends of Parks groups across Luton, supported by parks & countryside officers, is signed up to the National Charter for Parks. One of its principles is to protect and enhance all parks. It is the council’s responsibility to protect Wigmore Park, so there should be no development whatsoever on this park. Yet, for this expansion proposal, two-thirds of it including the valuable County Wildlife Site would be destroyed.


The park is visited by many, both local and from outside the town. People bring their visitors to this park, an Asset of Community Value recognised by nearby villages Offley and Breachwood Green.

A 'replacement park' is proposed, with different soils, that would take decades to evolve into as diverse a park as flourishes now at Wigmore. It would be much further from people's homes – indeed in the next county, Herts – and a long way to walk to. North Herts does not approve of this. The Council would be unable to replace Wigmore Park with a new park fully within Luton. Many, particularly older people who have grown up with the park, would be unable to access it, and their nearest part would have a noisy view of the airport. Most people live too far from the replacement Wigmore Park so wouldn't use it. Wigmore Valley Park must be given priority for its wildlife, size and amenity value for residents.

Luton Council has discussed with Fields in Trust a deed of dedication, aiming to protect all Luton's parks and green open spaces from development, one park each year, a ludicrous idea which would take a century. Luton is overdeveloped, so needs all its parks, and they should all be protected. Green space, beneficial to health, is unevenly distributed. 5 wards have less than the recommended levels.


*"Evidence shows that living in a greener environment can promote and protect good health, aid recovery from illness and help with managing poor health ... It is vital that the Local Plan and greenspace/green infrastructure strategy are informed by local health data, the Joint Strategic Needs Assessment and the Joint Health and Wellbeing Strategy and take a wider view of the multifaceted benefits of greenspace. **Policy:** Consider local green (and blue) space to be critical assets for maintaining and supporting health and wellbeing in local communities."*

from 'Improving access to greenspace' – Public Health England review, 2020



4 Pollution: More planes mean millions more road vehicles and poorer health

The Joint Strategic Needs Assessment (JSNA) paints a bleak picture of health in Luton. Expansion would add to already unacceptably high levels of people suffering respiratory problems in the town. Pollution ruins the lives of people with asthma, and can lead to heart attacks and strokes. To protect the health of the most vulnerable in our community, we cannot afford to return to pre-Covid levels of flying and driving. Clean air zones are hard to implement and monitor, and often not set up correctly or fairly. To improve air quality through low emission zones is a huge challenge, evidenced here.



Luton is a Health authority, yet appears to prioritise airport expansion with its adverse health effects over improving public health. There have been 2 changes in Director of Public Health since Covid. Much pollution is caused by workers and tourists travelling to and from the airport, Luton's biggest employer.

The DEFRA NO₂ monitoring station on the E-W A505 near junction 11 has for many years shown pollution in morning peak hours reaching 3 or 4 times the legal levels – highly dangerous for health, and close to several schools. Pollution can stunt the growth of youthful lungs and cause lifelong problems. (Also see 9)

The worst place for one's health is sitting in a vehicle in a polluted traffic corridor. Luton has a high level of drivers.

These headlines are from 2018-19, the period when Luton reached 18 million passengers, having doubled in 5 years:

Air pollution kills 40,000 a year in UK from Lung and Heart disease

Air Pollution causes 15,000 new Diabetes cases a year

Air pollution Dementia threat

Air pollution causes huge loss of Intelligence

Air pollution particles in mothers' placentas harms unborn babies

Air pollution: Greenspace nr home in childhood linked to fewer adult respiratory problems

Air pollution Children breathe toxic air at school & on school run

Air pollution – how it harms your heart

Air pollution in Luton hits illegal levels

Cleaner air from tackling climate change

Air pollution – UK govt given final warning in High Court

Air Pollution: Govt's Chief Medical Officer calls for tougher standards

UK parents 'worryingly unaware' of damage from air pollution

Air pollution linked to Alzheimer's disease

Air pollution nanoparticles linked to Brain Cancer for first time

Cutting air pollution 'can prevent deaths within weeks'

Four reports found Luton to be the most polluted town:

British Heart Foundation 5 Dec 2019 - Luton residents breathe some of the most polluted air in the East of England

Universities of Birmingham and Lancaster 20 Dec 2019 - Luton has worst air pollution in UK

Centre for Cities annual study 28 Jan 2020 - Luton has the highest number of deaths from air pollution in the East of England

British Lung Foundation (BLF) and Asthma UK 11 Feb 2021 - Dangerously high levels of toxic air in Luton putting elderly at risk

5 Luton is the wrong place for a major airport

The airport sits above a densely populated town, most people living in a valley where pollution gathers on windless days. This may have been fairly harmless when passenger numbers were 2-3m a year. Now it is the town's major health hazard. Many in South Luton and Slip End have reported greasy dust coating surfaces in their homes and gardens.

Luton saw the fastest airport expansion in UK, doubling from 9 to 18m passengers in 5 years between 2014 and 2019, instead of 15 years as promised

bringing the fastest growing amount of traffic accessing it. As aviation was the fastest growing source of climate emissions, this made Luton the fastest growing source of emissions in the UK.

As almost nothing was done by the council to mitigate these effects, it is our strong view that 'green controlled growth' referred to in documents and on Luton Rising's website **see 12** is greenwash. Permission to expand would bring Luton back to worst polluted town and fastest growing source of climate emissions.

That Luton is the wrong place for a major airport is demonstrated by the on-street parking, causing a nuisance to residents, which could not take place at Stansted or Gatwick.

6 New roads against local plan (2017)

Luton's DCO proposal contravenes government and Luton Local Plan requirements (eg on rat-runs, leisure space, noise, destruction of parks and green space and fly-parking).

A new junction would take airport traffic from outside the local area through Wigmore Park into Eaton Green road, **against the Local Plan**, and through residential areas, creating a new major route to the airport, causing rat-runs past 3 schools. This includes around 10 new traffic lights which would increase pollution and danger, and would adversely affect quality of life. Lessons about air quality and health from 2018-19 have not been learned.

The council has failed to increase cycling – the town was traditionally the home of Vauxhall, and cycling is not part of the culture of many ethnic groups living here. Against a clear need for sub-regional East-West rail to reduce vehicle journeys, the council pushed through a local Luton-Dunstable busway, which means that nearly all east-west journeys are by road.

Friends of the Earth placed 9 diffusion tubes for a month at various junctions near the airport. Lab results (rounded down to allow for any error) revealed NO2 levels near or exceeding legal levels, including a major school walking route for pupils. (Also see 6)

The NPPF refers to how sustainable transport should be focused on to help reduce congestion and emissions and improve air quality (Paragraph 105). Luton BC has done almost nothing towards this while doubling airport passengers between 1913 and 1919, which vastly increased road traffic and gave Luton the title of 'worst polluted town'. The council has lost public trust, so anything claimed by its company run by councillors, Luton Rising, is not credible.

7 Car spaces and travel would increase by over 50%

To reduce climate emissions, pollution, noise congestion, inconvenience, and to improve health and quality of life, we must cut car travel, not increase it. These car spaces would be filled by a massive jump in vehicles from outside the borough, and their impacts would be far greater than those of the 18m passengers which made Luton the most polluted town.

We have heard from many residents about people who are inconvenienced by those who park cars in residential roads to avoid parking charges at the airport.

8 Noise and dust would increase, cause stress and health effects

For three years running, from 2017 to 2019, those living below flightpaths endured more noise than is permitted. In Luton, the main people affected are those in South ward, but this had adverse effects on those within a 15 mile radius. Constant aircraft noise both day and night is relentless for those in South Luton or in nearby boroughs under flight paths. Sleep deprivation can have serious health effects and badly affects quality of life and health. This must not be made worse! Not nearly enough time is allowed for sleep – Luton airport's night schedule, including cargo flights, is worse than Heathrow.

Since Covid, more people work from home. This is hard when your thoughts, and online conversations, must compete with frequent plane noise. 'Compensation' for all this in the form of double glazing is inadequate in amount, and useless in warm months. If air conditioning is used this adds to climate impacts. A Cutenhoe Rd resident says: "Take-off noise drowns out the human voice, TV & radio programmes. On landing, the amount of soot & dust created covers my greenhouse and any washing hung out to dry."

9 Economy - local and national

Local Economy - Effect of airport-induced congestion

Morning airport traffic queues back up already on to the slip-road and on to the M1 at junction 10, and cause congestion around Junction 11, near 4 schools. Congestion affects local people and others travelling through, trying to reach their workplaces but trapped in congestion. Every minute in a queue is a minute lost from working hours, as well as from personal time. Pollution affects health, and increases time off work.

There are many scientific studies showing that a healthy society needs a healthy balance between economy, environment, and health & social wellbeing. It is clear that Luton Council prioritises income above all else.

On 8 Oct 2018, at a public meeting, I said to the council leader:

Today the Intergovernmental Panel on Climate Change has produced the most serious and apocalyptic report I've ever seen. The United Nations says we have 12 years to radically change the behaviour of individuals, companies, govt and councils.

Business as usual is not an option.

Because it is the fastest growing UK airport, causing many millions more flights and car journeys, Luton is the fastest growing source of climate change in the UK.

This is already killing people around the world, and also killing local people with air pollution. We are now 4th most congested UK town.

Luton council just lent £300m to London Luton Airport Ltd, putting increased income before residents' health, environment & social wellbeing.

A Green New Deal would prioritise positive projects that cut fossil fuel use.

Will the council leader commit tonight to STOP irresponsibly expanding the airport?

The council leader replied: “***No – economic growth won’t stop.***”

So the council’s plan is to carry on towards the cliff edge.

National economy - Airport growth hinders UK growth and productivity

There is a huge disparity between what is spent by visitors to UK and UK residents’ spending abroad – this costs the UK economy billions every year.

Example: Overseas residents spent £3.0 billion in the UK in Aug 2022, and £3.1 billion in the UK in Jul 2022. UK residents spent £8.1 billion while overseas in Aug 2022, and £6.2 billion on visits overseas in Jul 2022.

[REDACTED]

[REDACTED]

10 Luton’s largest Landfill Site to be dug up ‘at high risk’ – consultants

This huge landfill contains decades of unregulated waste including WWII weaponry.

To develop buildings and roads on such sites has been shown at other landfills to cause big problems. In reports commissioned by LBC it was described by consultants including Arup as ‘high risk’. It can lead to subsidence, needing repair to roads and buildings; to a build-up of methane and other toxic air in buildings which can lead to sickness, fire and explosion; and deep piling can disturb toxins below which could leach, in this case, to a very wide catchment and pollute drinking water and rivers including the Lea and the Mimram.

To remove huge amounts of material would mean a great many HGV journeys close to homes over many months. The decision to take it elsewhere is questionable – which council is likely to welcome it? Having destroyed the biodiverse habitat which has evolved above the water-retaining clay cap, this would lower ground level considerably - where would all the material come from to replace it? This is not ‘sustainable development’.

11 DART link from Luton Parkway station will not reduce road traffic

While the M1 is affected by airport traffic, much also comes from east or west. Luton Council’s hopes to achieve Gatwick levels of public transport use are futile. Even if a slight modal shift were achieved (adding to already overcrowded trains), any environmental benefit would be quickly overwhelmed by the extra number of passengers, causing worse problems than in 2019. It was commissioned, and building began, with the intention of reaching a Terminal 2 before the public knew about the plan. This goes totally against the principle of local democracy.

12 Luton Rising website claims about mitigation are unproven greenwash

‘Green controlled growth’ (GCG) is the term used to claim pioneering initiatives.

This website is bursting with hypocrisy. Luton Council and its airport company run by councillors has a poor track record on delivering green successes – it has focused for the last decade and more on the airport, and is way behind many other councils.

Against government policy, the council ignores the impact of planes in the sky and the traffic airport expansion brings into the town. One is prompted to ask who had the nerve - or stupidity - to write on the LR website "One airport, one community, one planet."

GCG is not a legal term, with legal boundaries. All activities listed relate to airport activities on the ground, not in the sky, where most climate emissions are generated; and little is likely to be done about private vehicles or contractors travelling to the airport. If development were permitted, control of GCG would pass to the operator, a private consortium of companies operating for profit, who would not be answerable to law. The council itself has shown it prioritises money from airport growth over the needs of residents and people under flightpaths, so there could be no guarantee that meaningful mitigation would be provided. (Also see 2 above)

See 

13 Conflict of interests - Airport income not mainly for benefit of residents

There has been concern for some years (Bim Afolami MP has complained about this on behalf of his constituents) that Luton's ownership of the airport and its company Luton Rising (previously London Luton Airport Ltd) causes a conflict of interests. The directors are councillors. Airport ownership is a privilege other councils do not have. It might be acceptable if Luton was seen to be impartial, but airport policy has largely been made in private, with no internal opposition, allowing opportunities for commercial benefit of LBC and the operator to the detriment of residents.

Money spent on the airport is money not spent (except for a few community groups) for the benefit of all local residents – the main role of a local authority. Airport income has become a temptation for those running the council to act like a corporate. This affects residents' health, quality of life, convenience (time stuck in traffic cuts both employment and personal time; a pollution corridor is the worst place to be to breathe in killer fumes).

Many unwaged or low-waged people would suffer from the multiple effects of an expanded airport. *See 4.*

There is an irrational conflict between the council owning and promoting the airport and its expansion, and carrying out a Net Zero Roadmap, encouraging behaviour change to reduce impact on the Climate Emergency, eg people to burn less fossil fuels, travel less, buy local, buy less (especially from the far side of the world), eat less meat, reduce waste and plastics. Flying (the biggest annual carbon footprint for many) must be cut sharply.

The Local Government Association states "It isn't a consultation unless it's impartial". But two consultations, by London Luton Airport Ltd, then Luton Rising (a PR exercise name change) featured questionnaires full of leading questions designed to get answers the council wanted, and gave no option to say 'No expansion'.

The Local Government Association: *"Consultation involves listening to and learning*

from local people **before decisions are made or priorities are set.**” But the recent ‘consultation’ was a sham, so **did not fulfil the statutory requirement as part of its application for a Development Consent Order** for Luton Council to consult on its plan to expand the airport to 32m passengers. The council leader emailed all council staff, copying a promotional letter from the CEO of its own airport company Luton Rising, urging them to talk to people and promote expansion.

You will have seen the resignation letter (sent in by Chris Haden) from councillor and barrister Anne Donelan describing infighting and bad practice within Luton Council.

Further evidence of lack of democracy is in the attached document submitted by FoE in April 2019, ***Material Considerations***. This submission lists National and Local Plan policies that have been ignored, and a ***Balance of Harm***, demonstrating that the undesirable factors of expansion massively outweigh any desirable factors.

In every decision, Luton should be asking:

- 1) *Are we looking after nature?*
- 2) *Are we adding to the climate crisis?*
- 3) *Are we helping or hurting the health & wellbeing of local citizens and people elsewhere?*

14 Jobs claims unlikely, poorly paid, and green jobs needed

Jobs and economic benefits have been consistently overstated. Jobs are mainly low-paid, zero-hours contracts requiring unsocial hours. When giving itself permission in 2014 to expand from 9 to 18m passengers – which was reached by 2019 instead of 2028 as promised – LBC said that for every million more passengers there would be 1000 more jobs. When they reached 18m passengers, many jobs had come and gone, but there had been almost **NO** overall jobs despite doubling passenger levels. There were also many complaints from passengers that the airport was not pleasant to use, as it had been when smaller. The promise of 11,000 new jobs is therefore highly speculative, if not laughable.

15 Covid lessons not learned

The pandemic was a wake-up call – a once in a generation chance to learn lessons in changing behaviour, including our need for contact with nature. Now vested interests with thoughts only on money are in a race to go back to as destructive habits as possible. Luton Council aims for Zero Poverty by 2040. Covid has killed 800 in Luton – each one is to have a tree planted in their memory – and left many with health after-effects. Increased pollution from planes and traffic, coupled with current financial pressures, will add to the high level of health problems in the borough, leaving more people in poverty, not fewer.

David Oakley-Hill

Co-ordinator, Luton Friends of the Earth

(also Chair, Luton Friends of Parks and Green Spaces, although this submission does not claim to represent their views)

Attachments

- **FoE response to government call-in** of application to expand from 18 to 19 million passengers

- **Material Considerations** This document shows the process Luton BC has pursued leading up to the DCO to be flawed in many ways. It shows where Luton has not followed national guidance or its own local Plan, and where it has withheld information or misled the people of Luton, betraying public trust. It also shows the *Balance of Harm* – how undesirable factors considerably outweigh desirable ones

FoE – David Oakley-Hill speech at Wigmore public meeting 11 Apr 2023

FoE – The Good Council's Charter + Airport revised 27 Jan 2023

FoE – response to Luton Rising consultation 4 Apr 2022

FoE – David Oakley-Hill speech to Council 30 Nov 2021

FoE – letter to Luton News 7 Jun 2020

FoE – press release 27 Feb 2020

Friends of Wigmore Park press release 19 Sep 2019

FoE – David Oakley-Hill speech to Development Control 27 Mar 2019

FoE – Century & Wigmore Park response part 2 23 Aug 2018

FoE – Century & Wigmore Park response part 1 28 Feb 2018

All on Inspectors' website (recorded 25 Aug) at

