



OBJECTING TO FUTURE LUTON AIRPORT EXPANSION USING THE OFFICIAL CONSULTATION FORM

Questions from the Future LuToN expansion consultation form are given below with suggested replies.

**PLEASE MAKE SURE TO SAY 'NO TO FUTURE LUTON EXPANSION' OR SIMILAR
IN EACH ANSWER YOU GIVE.**

This document has been created by the North Hertfordshire and Stevenage Green Party.
Please contact info@northherts.greenparty.org.uk if there are any questions.



Green Party
for the common good

Q4a Are there any other factors that you think we should consider in producing our demand forecasts?

No to Future LuToN expansion!

We have 10 years to reduce our greenhouse gas emissions to avoid the worst effects of climate change. Plans that cater towards increasing greenhouse emissions are therefore directly damaging to our planet and future generations.

If the UK government is serious about their plans to reach net-zero emissions in 2030 or 2050 the expansion of aviation cannot be supported. A government that is serious about reducing emissions will halt any support that increases air travel. It is expected that support for airlines and airports will reduce. We expect policies to regulate and limit the number of flights across the UK.

Movements like “FridaysForFuture” and Extinction Rebellion are making more and more people aware of the catastrophic effects of our emissions. A growing number of UK residents already consider their carbon footprint and avoid air travel. Research and news coverage are educating people about the disastrous effects of air travel on our health and the environment. Political leaders and businesses are more aware of these impacts; and are taking these considerations into account when making decisions.

All of this will not only slow, and eventually stop, the growth of air travel in the UK, but the aviation sector can also expect to be hit with more regulations and more open opposition. The current business case for LuToN Expansion with its projected growth and associated profit needs to be altered and reduced.

Q4b: Do you have any comments on the need for expanding LTN that we have set out?

No to Future LuToN expansion!

There is no need to expand the airport. It has only just reached its current capacity. The current capacity would allow each resident of the surrounding counties to fly several times a year. Any additional flights would only benefit “frequent flyers”, leaving the local residents to deal with the negative impacts.

Q5a: Do you have any comments about the benefits that we believe LTN will deliver nationally, regionally, and locally?

No to Future LuToN expansion!

The 'benefits' are not convincing.

Employment: Currently employment conditions at London Luton Airport are bad, including zero-hour contracts, unsocial working hours, and high exposure to the toxic fumes from the airplanes. An expansion would not improve these working conditions, in fact would probably worsen them.

Economy: With a growing awareness of environmental responsibility and a surge in digitalisation, more companies are opting away from aviation towards more sustainable choices, meaning that there would be limited benefit to local and national companies by offering more airport services.

On the contrary, the environmental harm and health implications negatively impact local, national and international economies.

There are no real benefits to be expected from these expansion plans.

Q5b: Do you have any comments or suggestions for how we maximise employment, skills, and training opportunities to help benefit neighbouring communities?

No to Future LuToN expansion!

The only way to actual maximise employment, skills and training opportunities would be not to expand the airport, but invest in future proof skills and employment. A creation of a green industry hub within the Enterprise Zone would enable local residents to find employment that is resilient to change and contributes to the benefit of all, including that of future generations. Introducing green technologies into the airport; leading on electrification of aircraft; and researching offsetting methods would be areas that would actually enhance employment, skills and training opportunities, not only for the next 20 but 100 years.

Only a shift away from expansion towards innovation and sustainable technology will truly benefit airport employees and neighbouring communities.

Q5c: Do you have any comments about our proposals for the Future LuToN Impact Reduction Scheme for the Three Counties of Bedfordshire, Buckinghamshire, and Hertfordshire (FIRST fund)?

No to Future LuToN expansion!

The only real way to reduce impacts for the Three Counties is NOT to expand the airport! The additional traffic, air pollution and noise, simply cannot be negotiated or mitigated.

The Future LuToN Impact Reduction Scheme is not fit for purpose:

Air pollution:

The plans state that "airport expansion would have no significant effect on existing air quality during construction or operation." This cannot be true and is not supported with any figures anywhere in the document. It is an untrue and deceitful statement.

Additional flights will cause additional emissions, adding to air pollution. Airplanes would need to be emission-free to have no effect on air pollution, and they are not. "Encouraging airlines to use their newest aircraft" is a meaningless remark with no positives. The proposed mitigation for air pollution is absolutely unfit for purpose. Additional passengers will cause additional surface traffic, adding to air pollution and road congestion.

Traffic and transport:

The plans state that "changes in traffic flows during construction and operation are not likely to result in significant effects." This cannot be true and is not supported with any actual analysis or figures in the document. It is an untrue and deceitful statement.

Increasing passenger capacity by 80% brings 80% more ground traffic to the airport. Even if the public transport quota of 45% can be reached (from currently 32%) this is still an increase of 31% of car users around the airport. The list of highway improvements outlined in the plan will not change the fact that the towns around Luton (including Luton) were not designed for this level of car traffic. Streets will become more congested and the resulting stress, noise and pollution cannot be mitigated. The proposed mitigation is absolutely unfit for purpose.

Climate change:

The plans state: "We acknowledge that the proposed development is likely to result in additional greenhouse gas emissions which would contribute to climate change." This is the only statement that we can agree with in the whole document. The proposed mitigations seem beyond cynical given this statement. The proposed mitigation is absolutely unfit for purpose.

Noise and vibration:

The plans state that "approximately 200 additional households are likely to experience significant noise levels due to changes to air noise during the day, and 450 additional households during the night." This is only the number of homes affected if aircrafts stick to the flightpaths, which they already don't. Suggesting home improvements to those homes is not enough. Life also takes place outside. Children play outside and there are various outdoor activities such as gardening and dog-walking. 50 airplanes per hour over our neighbourhoods cannot be mitigated, and the livability and value of those homes would plummet. Noise is known to cause stress and health problems. The proposed mitigation is absolutely unfit for purpose.

Water resources:

The plans states that there are "risks from the excavation and piling on former landfill which could expose and mobilise existing contamination and introduce new pollution pathways into the underlying groundwater." Given that the groundwater around Luton is already of poor quality this is a considerable and unacceptable risk. Additionally, the Three Counties is an especially dry area with Anglian Water already struggling to keep up with the demand in fresh water. Adding this size of development will put further stress on the supply and risk the wellbeing of local residents. The proposed mitigation is absolutely unfit for purpose.

Health and community:

The plans states that "The mitigation measures proposed for noise, air quality, traffic and transport, landscape, and visual effects would also result in the mitigation of effects on the health and wellbeing of the local population and the users of community resources." This is an untrue and deceitful statement.

Impacts on noise, air quality, traffic and transport, landscape and visual effects have been shown not to be mitigated at all by the plans. Therefore, the effects on health and wellbeing in the neighbourhood cannot be considered mitigated either. The proposed mitigation is absolutely unfit for purpose.

The above makes it clear that the Future LuToN Impact Reduction Scheme is absolutely not fit for purpose. Effects of the proposed expansion can be expected to severely impact the local residents.

The only way to ensure that the Three Counties are not further impacted is by not going ahead with the expansion.

Q6a: Do you have any comments about our proposed DCO development boundary and layout for the airport expansion?

No to Future LuToN expansion!

The construction work would have a huge impact not only on local residents but also on the general environment. Those cannot be mitigated. The only way to ensure no negative impacts is by not going ahead with the expansion.

Q6b: Do you have any comments on our airfield proposals?

No to Future LuToN expansion.

Q6c: Do you have any comments on our proposals for the existing terminal?

No to Future LuToN expansion.

Q6d: Do you have any comments on our proposals for Terminal 2 and supporting facilities, including the Luton DART, forecourt and coach station?

No to Future LuToN expansion.

A second terminal and the supporting infrastructure for more flights is not necessary. Luton Airport does not need to expand its capacity.

More provision for public transport is welcomed. This includes the Luton DART which would help improve the public transport link for the airport. However this should go ahead with the existing airport capacity and attempt to increase the take-up of public transport.

The environmental impact of any such measures needs to be kept to an absolute minimum.

Q6e: Do you have any comments on our proposals for car parking, including the numbers of spaces and locations proposed?

No to Future LuToN expansion.

There is no need to expand the airport. If there is no need to cater for additional passengers, there is no need to create additional parking spaces.

Every additional car parking space means one more car on our streets, causing greenhouse emissions, air pollution and noise, adding to traffic congestion and risk. The fewer cars at the airport the better.

Q6f: Do you have any comments on our landscape proposals?

No to Future LuToN expansion.

If there was no expansion of the airport there would be no need to re-landscape.

Creating nicely designed new landscapes will not negate the fact that award-winning Wigmore Park would have to be partly destroyed. That is natural habitat and cannot be packed up and moved, like office space. The park has had decades to develop. Ripping it apart will cause irreversible damage to wildlife and habitats. There are several groups opposed to the destruction of Wigmore Park.

The only way to truly benefit the landscape around Luton Airport is to reduce the impact of noise and air pollution on local residents, wildlife and habitats by scrapping expansion plans.

Q6g: Do you have any comments on our proposed park, that would replace Wigmore Valley Park?

No to Future LuToN expansion.

The plans would absolutely destroy the park! The plans cannot mitigate the irreparable damage that would be caused to local green space, wildlife and 70 acres of habitat.

Habitats that have grown up over decades cannot simply be “packed up and moved”. Destroying them will mean a major loss in local biodiversity and wildlife. Cutting down mature trees will destroy habitats and decrease the ability to sequester carbon. Removing green space and replacing it with concrete will increase flooding, increase the scarcity of water reaching the

aquifer, and harm the local climate. There are no positive effects to be expected from these plans.

Only scrapping the plans and not destroying any part of the park is acceptable.

Q6h: Do you have any comments on our drainage and utilities proposals for servicing the airport?

No to Future LuToN expansion.

There is no need for this expansion, so there is no need to destroy the area's natural drainage (namely green space). Artificial drainage will never be as effective in flood prevention, or for replenishing the aquifer.

There is no need for this additional artificial infrastructure.

Q6i: Do you have any comments on our proposals to deliver fuel by a new pipeline, which would connect to an existing national fuel pipeline in the green belt, rather than delivery of all aviation fuel by tankers on the road?

No to Future LuToN expansion.

If the airport was truthful about its claim to aim for zero emissions there would be no need for a fuel pipeline like this. If Luton Airport was genuine about low-emission or electric aircraft, less fuel would be needed. And investment in a new pipeline would not be necessary.

The proposal of this pipeline shows that Future LuToN expansion is not serious about their low-emission claims and the plan is untruthful in its proposals.

Q7a: Do you have any comments on our objective of increasing the number of passengers travelling to and from the airport using public transport to at least 45%?

No to Future LuToN expansion.

Expanding the airport and increasing the passenger capacity will increase the amount of people traveling to and from the airport. Increasing the percentage of passengers traveling by public transport cannot offset this additional strain on local streets, train and bus services. An expansion would still cause an additional 31% of cars on our streets.

An increase in public transport does not have to be linked to an expansion. If the airport was serious about their zero-emission goals, cars should be absolutely discouraged. A goal of 45% is not good enough.

The expansion needs to be stopped to meet zero-emission targets. Sustainable transport needs to be enhanced without airport expansion.

Q7b: Would the measures we are taking to improve public and sustainable transport encourage you to use them to access the airport?

No to Future LuToN expansion.

Improved public and sustainable transport services do not have to be linked to an expansion. They should be created anyway.

As more and more people realise the impact their mobility choices have on the future of our planet and for future generations, more people are choosing not to fly. If they have to fly, they will expect the highest possible provision in sustainable transport, or they will choose other airports.

Sustainable transport links will affect people's choice of whether to use Luton Airport in the future.

Q7c: Do you have any comments on our proposed road and junction improvements, and are there any other locations that you think need improvements to deal with increased traffic?

No to Future LuToN expansion.

The proposed road and junction 'improvements' would not be able to mitigate the effects of increased airport-related traffic. There are only a few streets and junctions that can be altered to increase capacity. Given the historical nature and structure of towns and villages around the airport many streets are simply unable to cater for more cars. Our streets are already congested and unable to deal with the traffic caused by the airport. Additional traffic cannot be accommodated. The only solution is not to expand the airport.

Our streets are already at breaking-point with traffic overload. Traffic is already channelled through our towns and villages to accommodate the airport. The livability of our towns and villages drops. Historic town centres and village greens lose their charm and people don't want

to live along those streets. Pets are routinely killed, and people don't want to walk, talk, or shop along those streets. Squeezing more traffic into these tight spots is unthinkable. It would cause even more congestion, air pollution, noise stress and health risks for residents and travelers alike. The negative implications are huge.

The proposed 'improvements' are absolutely unfit to help our streets to 'deal with' current or any additional traffic. The only solution is to not expand the airport - and simultaneously increase public transport capacities.

Q7d: Do you have any other comments on our surface access proposals?

No to Future LuToN expansion.

The situation with surface access to the airport is already bad. An expansion would be catastrophic.

Investment into improving surface access, especially via sustainable transport, needs to be made without expanding airport capacity.

Q8a: Do you have any comments on our proposed preparatory works?

No to Future LuToN expansion.

These 'Preparatory works' are not needed, because the whole expansion is not needed. Seeking planning permission for these works prior to obtaining planning permission for the whole expansion from the Secretary of State does not make any sense. It could indicate that LLAL is trying to undermine the application and consultation process. It certainly demonstrates contempt for the consultation process and implies that LLAL think expansion is a "done deal" regardless of any negative factors highlighted in the consultation. No planning permission should be requested before the decision is made for the whole plan.

The 'preparatory works' include the destruction of a major part of Wigmore Park. Habitats that have grown up over decades will be destroyed. There will be a major loss of local green space, biodiversity and wildlife. Cutting down mature trees both destroys habitats and decreases the ability to sequester carbon. Removing green space and replacing it with concrete will increase flooding and harm the local climate. There are no positive effects to be expected from these plans.

Only scrapping the plans and not destroying any part of the park is acceptable.

Q8b: Do you have any comments on how we propose to phase the development?

No to Future LuToN expansion.

The 'phasing' shows how LLAL want to increase airport capacity over the next 20 years even though we have only 10 years to drastically reduce our greenhouse emissions if we want to save future generations from the worst impacts of climate change. It is not clear from the proposed 'phasing' how the airport is going to reach net-zero within the next 10 years. On the contrary, the phasing plans for further expansion imply that the zero-net deadline doesn't exist.

The vague greenhouse emission calculations LLAL provide do not match this 'phasing'. LLAL fails to demonstrate that the proposed expansion plans don't underestimate the necessary emission reductions. Hence the plans are insufficient and should be scrapped.

Q8c: What are your views on our earthworks proposals to create the platform on which to build our expanded airport?

No to Future LuToN expansion.

Any earthwork is unnecessary as this whole expansion plan is unnecessary.

Q8d: We want to be a good neighbour during construction – what are your views on the adequacy of our proposals to manage construction activity? Are there any other measures you would suggest to minimise the impacts of construction on neighbouring communities?

No to Future LuToN expansion.

The construction of this proposed expansion will cause severe impacts in noise, air pollution, traffic and greenhouse gas emissions. It will make the lives of those affected a complete misery. The harm cannot be offset, neither has LLAL managed to outline any meaningful mitigation.

The only way to ensure these plans don't harm the local residents and environment is to not allow the construction to take place.

Q9a: Do you have any comments on our proposals to manage and mitigate air pollution during construction and operation?

No to Future LuToN expansion!

The plans state that "airport expansion would have no significant effect on existing air quality during construction or operation." This cannot be true and is not supported with any figures anywhere in the document. It is an untrue and deceitful statement.

Additional flights will cause additional emissions, adding to air pollution. Additional passengers will cause additional surface traffic, adding to air pollution. All airplanes would need to be emission-free to "have no significant effect". The statement "...encouraging airlines to use their newest aircraft" is meaningless.

The proposed mitigation for air pollution is absolutely unfit for purpose.

Q9b: Do you have any comments on our proposals to minimise increases in greenhouse gases, and to adapt our proposed development to climate change?

No to Future LuToN expansion!

Climate change:

The plans statement: "We acknowledge that the proposed development is likely to result in additional greenhouse gas emissions which would contribute to climate change." might be the only statement that we can agree with in the whole document. The proposed mitigation seems beyond cynical given this statement.

The proposed mitigation is absolutely unfit for purpose.

Q9c: Do you have any comments on our proposals to manage and mitigate the effects of noise and vibration during construction and operation?

No to Future LuToN expansion!

The plans state that "...approximately 200 additional households are likely to experience significant noise levels due to changes to air noise during the day, and 450 additional households during the night." This is only the number of homes affected if aircraft stick to the flightpaths, which they already don't, so these numbers are a minimum. Suggesting home improvements is not enough. Life also takes place outside. Children play outside and there are various outdoor activities such as gardening and dog-walking. 50 airplanes per hour over our

neighbourhoods cannot be mitigated and will cause a continuous barrage of noise. Noise is known to cause stress and stress-related health problems.

The proposed mitigation is absolutely unfit for purpose!

Q9d: Do you have any comments on how we are proposing to manage and mitigate the other environmental impacts outlined in chapter 9 of the Guide to Statutory Consultation, including: soils and geology, water resources, waste and resources, health and community, biodiversity, landscape and visual impacts, and cultural heritage?

No to Future LuToN expansion:

Water resources:

The plans states that there are "risks from the excavation and piling on former landfill which could expose and mobilise existing contamination and introduce new pollution pathways into the underlying groundwater." Given that the groundwater around Luton is already of poor quality this is a considerable and unacceptable risk. Additionally, the Three Counties is an especially dry area with Anglian Water already struggling to keep up with the demand for fresh water. Adding this size of development will put further stress on the supply and risk the wellbeing of local residents.

The proposed mitigation is absolutely unfit for purpose.

Health and community:

The plans state that "The mitigation measures proposed for noise, air quality, traffic and transport, landscape, and visual effects would also result in the mitigation of effects on the health and wellbeing of the local population and the users of community resources." This is an untrue and deceitful statement.

Impacts on noise, air quality, traffic and transport, landscape and visual effects have been shown not to be mitigated at all by the plans. Therefore, the effects on health and wellbeing in the neighbourhood haven't been mitigated. The proposed mitigation is absolutely unfit for purpose. The above makes it clear that the Future LuToN Impact Reduction Scheme is absolutely not fit for purpose. Effects of the proposed expansion can be expected to severely impact the local residents.

The only way to ensure that the Three Counties are not further impacted is by not going ahead with the expansion.

Q9e: Do you have any other comments on our proposals to manage and mitigate the effects of airport expansion?

No to Future LuToN expansion:

The plans to mitigate the effects of airport expansion are inadequate as demonstrated by all of the above. It is absolutely unfit for purpose.

The only way to prevent catastrophic impacts on local residents and the environment both locally and globally would be to scrap the expansion.

Q10a: Do you have any comments on the extent of land and rights we are seeking to acquire both permanently and temporarily, and our proposal to apply for compulsory acquisition powers to achieve this?

No to Future LuToN expansion:

London Luton Airport does not need to be expanded. There is no need for it. This means there is absolutely no need to allow the airport to swallow up any more land that it already has.

We most definitely oppose the granting of any compulsory acquisition powers to LLAL. The company has shown lack of consideration for the environment and health and wellbeing of local residents. It should not be allowed to expand, and certainly not be given any additional powers.

Q10b: Do you have any comments on our proposed approach to buying properties and land, and our approach to compensation, including our discretionary compensation offers?

No to Future LuToN expansion:

As this expansion is neither needed nor wanted, absolutely no land should be bought by LLAL to support it.

Q10c: Do you have any comments on our proposal to introduce three noise insulation schemes for eligible local residents to address the effects of noise from the expanded airport?

No to Future LuToN expansion:

These schemes are absolutely unfit for purpose:

- They would only reduce certain sorts of vibration and noise.
- They would not benefit all affected residents.
- They would not mitigate impacts on wildlife and outdoor activities.
- They would trap people in unsaleable houses and make life outdoors a complete misery.

Noise impacts cannot be mitigated. The only way to avert this catastrophe is to make sure that plans for an expansion are abandoned.

Q11: Do you have any other comments about our proposals to expand LTN?

No to any expansion of LTN!

The airport is surrounded by historic towns, villages and countryside. It has already outgrown the area that this densely populated rural setting can allow.

The impact on local residents would be catastrophic in terms of the misery of traffic congestion, noise, and air pollution. The quality of life of those affected would massively deteriorate.

Already more than 80 people die of air pollution in Luton alone every year. Air pollution has proven to cause respiratory illnesses, is linked to diabetes II and brain cancer. An expansion would add to these health problems. Noise is shown to cause stress and stress-related health problems. Also, wildlife is affected – for example birdsong cannot compete and birds can't hear each other. An expansion would worsen the situation.

Traffic is already at breaking-point around the airport. Even with 'improvements' to certain spots, the streets in the historic towns and villages around Luton are already struggling with congestion and the associated problems of stress, air pollution and noise. More traffic simply cannot be accommodated.

LLAL's numbers for economic growth and employment are not convincing given the growing wariness about the health and environmental impacts of aviation, and the current precarious employment conditions at the airport.

The proposed expansion is neither needed nor wanted by the local residents in North Hertfordshire. It needs to be stopped.