**Comments on planning application 21/00031/VARCON** - Variation of Conditions 8 (passenger throughput cap), 10 (noise contours), 22 (car parking management), 24 (travel plan) and 28 (approved plans and documents) to Planning Permission 15/00950/VARCON (dated 13th October 2017) to accommodate 19 million passengers per annum and to amend the day and night noise contours. | London Luton Airport, Airport Way, Luton

From Michael Chadwick, Planning Team, Chiltern Society, White Hill Centre, White Hill, Chesham, HU5 3AY

These comments are submitted on behalf of the Chiltern Society. The Chiltern Society is a charity with over 7000 members which seeks to conserve and enhance the environment of the Chilterns, including the Chilterns AONB, for the benefit of its residents and visitors. A particular aim is to ensure the protection of the special character and qualities of the Chilterns AONB, which include its tranquillity and availability for quiet enjoyment, and so we seek a reduction in aircraft noise affecting the Chilterns to the extent that this is reasonably practicable.

We object to this application, more specifically to the variation of Condition 10 relating to noise contours, because of the adverse impact this would have on residents by night, and users of the AONB for quiet enjoyment by day.

And, more fundamentally, because the rationale given for needing to relax the permitted limits simply does not stand up to scrutiny:

The impact of Covid on the aviation industry and travel habits has been so great that it seems highly unlikely that passenger numbers will recover to previous levels for several years, if ever.

The number of aircraft movements will also be heavily reduced, although perhaps not to the same degree.

And, contrary to the speculation in the Planning Statement, the European Commission has already proposed that the “use-it or lose-it” slot rules will be altered for summer 2021 to require only 40% of slots to be used. Further ahead, there will be potential scope for the UK, now that it is outside the EU, to amend the rules further: with the pressing need to reduce carbon emissions, it surely would be unconscionable to retain a system which requires airlines to fly half-empty aircraft solely to keep slots.

With generally lower traffic across Europe – in December, the EC forecast no more than 50% of 2019 levels – en route delays arising from severe weather events and congestion will be commensurately reduced, so fewer late arrivals.

By the time, in subsequent years, passenger and movements return closer to previous levels, newer quieter aircraft will be in the fleets, now that the 737 Max grounding is coming to an end, and more Airbus neo models are delivered.

And the AD6 airspace change that reduces interaction with Stansted traffic will be in place, greatly reducing the risk of arrival flow regulations causing delay.

For all these reasons, there is no logical reason for why a variation to the approved noise contour is actually needed, irrespective of whether such a relaxation would be justified in terms of weighing benefits against adverse impacts (which we firmly believe it wouldn’t). Therefore, the application must be refused.