

Executive Summary of Responses to REP2-034 (WRs Part 1b of 5) Issued

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1 Introduction

1.1 Scope

- 1.1.1 REP2-034 contains responses to Written Representations (WRs) Part 1b of 5. It collates the WRs from a number of parties.
- 1.1.2 Detailed responses #1 through #92 are included in the sister document “Response to REP2-034 (WRs Part 1b of 5) issued ID 20037459” which accompanies this Executive Summary.
- 1.1.3 Document “ Response to REP2-034 (WRs Part 1b of 5) issued ID 20037459” addresses only the WRs attributed to Michael Reddington, i.e. Pages 166 through 232 in the ‘pdf’ version of REP2-034.
- 1.1.4 In order to provide a clearer overview of the most important points, this Executive Summary has been produced to assist the ExA.

1.2 Findings

- 1.2.1 Many of these responses are detailed and extensive, but most importantly raise significant red flags that must be addressed as a matter of urgency.
- 1.2.2 Some of the other responses request further documentation from the Applicant, a proportion of which should be eventually secured as a Planning condition so that the Applicant cannot deviate from agreed procedures/methodologies during Construction.
- 1.2.3 The document “Response to REP2-034 (WRs Part 1b of 5) issued ID 20037459” contains a significant number of requests for the ExA to instruct the Applicant to provide required information.
- 1.2.4 We have detailed below what we believe are the most important issues that need to be addressed, as well as the most relevant Response ‘x’ that refers

2 Urgent Items

2.1 Insulation – Eligibility and Compensation (Response #70)

- 2.1.1 This has generated a huge red flag. Issues of eligibility and compensation are scattered throughout the library of documents. Without having access to the software it was almost impossible to determine at what noise levels, at what times of the day, residents were eligible for insulation against Noise. (Assume initially, that the issue of Total Noise (Response #52) has been resolved.).
- 2.1.2 Five Schemes were proposed:
 - Scheme 1** – a full package of agreed noise insulation works to habitable rooms;
 - Scheme 2** – for residential properties inside the 60dB_{L_{Aeq},16h} contour and outside the 63dB_{L_{Aeq},16h} contour, a contribution of up to £20,000 for agreed noise insulation works to habitable rooms;
 - Scheme 3** – for residential properties inside the 55dB_{L_{Aeq},8h} contour and outside the 60dB_{L_{Aeq},16h} contour, a full package of agreed noise insulation works to bedrooms;
 - Scheme 4** – for residential properties inside the 57dB_{L_{Aeq},16h} contour and outside the 60dB_{L_{Aeq},16h} contour, a contribution of up to £6,000 for agreed noise insulation works to habitable rooms; and

Scheme 5 – for residential properties inside the daytime 54dB $L_{Aeq,16h}$ contour and outside the 57dB $L_{Aeq,16h}$ contour, a contribution of up to £4,000 for agreed noise insulation works to habitable rooms.

2.1.3 However when one drills down it becomes clear that these contradict other statements in other places, and that these Schemes provide **almost NO** compensation for Night Noise – despite it being the most sensitive time for receptors. The Applicant – as a matter of urgency – must revisit these proposals.

2.1.4 It also became clear that there are several errors on drawings which the Applicant needs to remedy immediately.

2.2 Insulation - Works Programme (Response #70)

2.2.1 In various places the Applicant Makes a commitment to prioritise insulation for the worst-affected residents but in chapter 16 paragraph 16.9.147 slips in the following:

*“... By assessment Phase 2b noise insulation will have been rolled out to all the communities in **Table 16.53** should they take up the offer in a timely manner.”*

The Applicant is stating that it could take him up to 2043 to provide insulation to homes in Phase 1 with noise levels above SOAEL! This is unacceptable and only goes to demonstrate the Applicant’s lack of concern for resident’s health. This gives a lie to previous statements where the Applicant was going to ‘prioritise’ insulation for worst-affected homes.

2.2.2 e.g. Page 173 paragraph 2:

*“The **Draft Compensation Policies Measures and Community First** document contains a commitment, in paragraph 6.1.14 to prioritise the most affected properties within the latest 63dB $L_{Aeq,16h}$ and 55dB $L_{Aeq,8h}$ contours and introduce each scheme as efforts to insulate those in worst affected contours are complete. “*

2.2.3 And in response in REP2-034 Page 216 Row 2:

*“The Applicant is making a commitment to prioritise areas for noise insulation based on those most significantly impacted. Whilst roll-out will be proactively managed by the airport operator a programme has not been specified because the take up rate and speed of take up cannot be regulated by the Applicant (see **Draft Compensation Policies Measures and Community First [TR020001/APP/7.10]** “*

2.2.4 The Applicant must provide an undertaking to ensure that mitigation is in place before the anticipated noise level increases begin. A suitable Programme for insulation needs to be submitted for comment forthwith

2.3 Total Noise (Response #52)

2.3.1 The Applicant has been careful to ‘split off’ different noise sources but we cannot see why the total noise at each receptor cannot be calculated since they all use the unit dB L_{Aeq} . We have asked the ExA to press the Applicant for a response, and for the eligibility for insulation to be taken from this total Noise figure.

2.4 Increase to 32mppa (Responses #1 and #3)

2.4.1 We have questioned why the Applicant is still insisting on a target of 32mppa when there appears to be no strong basis for this.

- 2.4.2 The Applicant claims to be following the Jet Zero Strategy.
- 2.4.3 He refers to the Jet Zero Modelling Framework (2022) - 'JZMF' as a basis for 32mppa. However, 'JZMS' makes it clear in paragraph 1.7: "*No passenger demand forecasts are presented in this document – but a wide range of possible UK aviation CO2e emissions pathways forecasts are presented in Jet Zero: further technical consultation.*"
- 2.4.4 JZMF Annex D: *Airport Runway capacity assumptions for carbon modelling*" shows 32mppa in Luton by 2030. Clearly this was never going to happen and the figure is merely used to determine maximum carbon budgets, so it is not an endorsement of the 32mppa of the Application.
- 2.4.5 Furthermore "Jet Zero strategy One Year On" (2023) has downgraded UK aviation forecast passenger demand for 2050 (relative to 2018) from 70% to 53% in just twelve months. The Applicant is still looking for a demand increase of 78% over 18mppa.
- 2.4.6 It would appear therefore that 32mppa target has no sound basis and the Applicant should review his expansion case urgently.

2.5 Additional Documentation (Response #19)

- 2.5.1 The Applicant has not provided any details of the testing regime he intends to carry out before or after insulation works, such as the noise limits that will be applied within residences, nor a document that sets out eligibility criteria nor a pro-forma of the offer letter that will be sent to eligible residents. Three documents need to be produced and should be secured so that the Applicant has to meet certain commitments. The current insulation scheme did not secure these documents.

1. Eligibility Document
2. Offer Letter
3. Test Document

2.6 External Noise (Responses #32 and #33, #61)

- 2.6.1 At several points the Applicant tries to downplay the increase in external noise due to additional ATMs by quoting the three levels of mitigation. But that is all they are – mitigation. Residents will still be subject to even more excessive external noise than now and the Applicant will not do anything about it (no respite or no 'no-fly' times) because it could harm the Airport financially.
- 2.6.2 This increase in noise is also contrary to the Luton Local Plan (Response #61). The Local Plan prescribes that there be a further noise reduction or no material increase in day or night time noise.

2.7 Noise Monitoring (Response #37)

- 2.7.1 The Applicant is less than entirely clear when it comes to reporting on noise monitoring. LLAOL have several mobile and fixed noise monitors but they are deployed under flight paths, i.e. Air Noise. They are not used to monitor Ground Noise for example. IN future the Applicant should ensure that all forms of noise are monitored.

2.8 Look Up Tool (Response #64)

2.8.1 The Applicant has offered to produce a Look up tool (piece of software) that will allow residents to check if their property is eligible for insulation. This tool should be secured as a planning condition so that residents are able to check immediately works commence.. The Applicant does not advise how this tool will be rolled out to residents.

2.9 Health and Safety – Excess Noise (Response #75)

2.9.1 We have asked the Applicant to identify who is ultimately responsible for the health and wellbeing of residents who are exposed to excess noise. This appears to be a Health and Safety issue, therefore does someone have a Duty of Care – or equivalent.

2.10 Noise Insulation Scheme Sub Committee (Response #81)

2.10.1 We have raised concerns that the NIS has no teeth. It has no power to make decisions, it appears simply to be a rubber stamp for LLAOL. It should be able to influence priorities, or even have the power to make LLAOL provide sufficient financial provision to ensure properties are insulated in a timely manner, i.e. not years into the future, and that tests are carried out in accordance with the agreed Test document.

2.11 Noise Action Plan (NAP) (Response #87)

2.11.1 Not only is the Current Noise Action Plan (NAP) incorrect, but that the Draft NAP for 2024-2028 appears also to be in error. The Applicant advised at the ISH3 hearing on 27th September 2003 that this document was out for comment. The Applicant should review and correct such errors AND to include actions in respect of measurements of Ground and other noise sources, not just Air Noise.

2.12 Air Quality (Response #9)

2.12.1 We can smell and taste volatile compounds ‘dumped’ all around our neighbourhood, and there can only be one likely source - the airport.

2.12.2 We used the term 'fuel dumping' in the WR which may not be fully descriptive and therefore the Applicant has translated this as 'jettison' and responded accordingly.

2.12.3 Instead ignoring our comment the Applicant should have more detail but importantly given an undertaking to get out into the field and confirm the situation by experience, as soon as possible. (After all, it has the hallmarks of a volatile compound which by definition will dissipate).

2.13 Surface Access (Response #10)

2.13.1 The Applicant is proposing to implement parking control areas around the airport in order to dissuade opportunistic parking by airport users. Unless the residential parking control system is free to residents and paid for by LBC (from LR contributions) this is totally unacceptable.

3

Glossary

ATM	Air Traffic Movement
ICCAN	Independent Commission on Civil Aviation Noise
JZMF	Jet Zero Modelling Framework
LA	Local Authority
LBC	Luton Borough Council
LR	Luton Rising
LOAEL	Lowest Observable Adverse Effect Level
LLA	London Luton Airport
LLAOL	London Luton Airport Operations Limited
NAP	Noise Action Plan
NAPDM	National Air Passenger Demand Model – econometric model of unconstrained trip demand by passenger markets
NIS	Noise Insulation Sub-committee (of the Consultative Committee)
NOEL	No Observable Effect Level
mppa	million passengers per annum
SOAEL	Significant Observed Adverse Effect Level
UAEL	Upper Adverse Effect Level
UKHSA	UK Health Security Agency