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8.91 Applicant's response to Issue Specific Hearing 3
Action 26: Noise Insulation Delivery Programme

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.91

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

**London Luton Airport Expansion Development Consent
Order 202x**

**8.91 Applicant's Response to Issue Specific Hearing 3 Action 26:
Noise Insulation Delivery Programme**

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1 INTRODUCTION

- 1.1.1 This document has been prepared by Luton rising (a trading name for London Luton airport Limited (the "Applicant")) in support of the application for the expansion of London Luton Airport (the airport) from 19 million passengers per annum (mppa) to accommodate 32 mppa (herein referred to as the 'Proposed Development').
- 1.1.2 **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]** provides detail about the compensation measures the Applicant will introduce, including who qualifies.
- 1.1.3 The document explains that the Applicant will introduce a range of discretionary compensation measures to support those most impacted by the Proposed Development. In all cases part of the eligibility criteria will require the property to fall within a specific noise contour area.
- 1.1.4 The airport operator currently operates a Noise Insulation Scheme. The scheme seeks to provide funding for a range of measures to compensate for the impact of noise on properties within a defined noise contour.
- 1.1.5 The new Noise Insulation Scheme has been designed to significantly improve on the current Noise Insulation Scheme not only by increasing the number of properties which may be eligible under the new Scheme but also by improving the levels of contribution offered.
- 1.1.6 The Noise Insulation Scheme has been designed to meet the aims of Government noise policy as set out in **Chapter 16 Noise and Vibration of the ES [REP1-003]** and **Applicant's Post Hearing Submission - Issue Specific Hearing 3 [REP3-050]**. Chapter 16 notes that there will be temporary adverse likely significant effects in assessment Phase 1 until such time as the rollout of the Noise Insulation Scheme above the Significant Observed Adverse Effect Level (SOAEL) is completed. This affects approximately 1,950 properties.
- 1.1.7 The Applicant has further expanded the insulation scheme to include eligibility based on ground noise exposure. However, this is an additional voluntary scheme, does not form part of the noise assessment in **Chapter 16 of the ES [REP1-003]** and all properties identified as experience adverse likely significant effects or ongoing significant effects on health and quality of life from ground noise would also be eligible for the prioritised air noise Schemes 1 to 3. This document therefore focusses on the air noise scheme and in particular the prioritised rollout of Schemes 1 to 3.
- 1.1.8 The Examining Authority has asked the Applicant to provide a note regarding acceleration of the noise insulation delivery programme and the practicalities of market supply. The Applicant is seeking to demonstrate that it is committed to rolling out the scheme as fast as is reasonably practicable, within the context of sustainable development, therefore meeting the aims of Government noise policy.

2 THE PROPOSED SCHEME

2.1.1 The Applicant is proposing to make improvements to the currently proposed Noise Insulation Scheme as set out in **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]** which will help accelerate the take up of the noise insulation offer.

2.1.2 These include:

- a. In order to ensure successful delivery of the scheme a sub committee of the London Luton Airport Consultative Committee (LLACC) who will be provided with the data on eligible properties will determine the priority areas for noise insulation based on those most significantly impacted and other guidance from the Applicant covering eligibility criteria, commitments it has made to deliver the mitigation and the efforts it expects to be made to put works in place quickly.
- b. The Applicant will write to all eligible property owners and occupiers in the areas identified by the LLACC Noise and Track sub committee and otherwise in accordance with the roll out plan to invite property owners to apply for the relevant scheme. On receipt of this invitation the homeowner may confirm whether they would in principle like noise insulation. The airport operator will then arrange for a pre-procured contractor to visit the property with a view to preparing a schedule of noise mitigation measures according to the scheme for which the property qualifies.
- c. Where the owner qualifies for more than one level of insulation under the scheme the owner will be given the option as to which scheme they want to apply to.
- d. When the specification for works has been approved, a date for installation will be agreed with the homeowner and the work scheduled for completion.
- e. A proactive approach will adopted by the Applicant to ensure both knowledge and availability of the offer has been clearly and openly communicated. To assist homeowners the Applicant will make available an online 'look up' tool which homeowners can interact with to establish which scheme or schemes their property may be eligible for based on the latest applicable noise contours.
- f. The offer to homeowners will be supported by a multi-stage programme that is designed to promote awareness of the scheme and encourage acceptance. Each recipient of the offer will be given 30 days to respond to the initial letter. There will be local publicity using a range of measures that may include door knocking, banners, leaflets etc.
- g. On receipt of a response the Applicant will provide details to their procured contractor who will aim to contact the homeowner within one week to make an appointment. The contractor will then aim to schedule the appointment within a further two weeks.
- h. The contractor will confirm which rooms are eligible for the insulation and work with the homeowner to identify the most suitable insulation within the cost that will be covered by the scheme.

- i. After the meeting, the contractor will issue a quote to the homeowner with confirmation of the rooms to be covered and a requirement for the homeowner to respond within 4 weeks.
- j. On receipt of an acceptance, as soon as reasonably practicable, a manufacturers survey will be carried out to finalise the measurements before manufacture. Manufacturing is then typically expected to take 6 weeks from date of order.
- k. To further support the promotion and administration of the scheme, tenants and occupiers will receive letters and be invited to initiate the application with implementation subject to landlord approval. Local letting agents will be contacted for them to contact property owners if they have eligible properties on file to ensure landlords are also made aware of the scheme.
- l. Support will be provided for households who do not have English as a main language, have low literacy or where there are particular vulnerabilities due to age, disability or poor health. The process will include safeguarding and clear communication protocols for surveys and works in the homes of vulnerable persons.
- m. To assist with the costs associated with securing listed building consent homeowners faced with this additional step will be eligible for a payment being a contribution towards those costs, reasonably and properly incurred, up to a maximum of £2,500. Once the homeowner has accepted the offer, the Applicant will advance funds where required to enable the homeowner to apply for and secure the consent.

3 PRACTICALITIES OF ROLL OUT AND SUPPLY

- 3.1.1 The Applicant has held meetings with other organisations who operate similar Noise Insulation Schemes for other major infrastructure developments. The schemes provide insulation not grants and address those properties most affected by noise from public works.
- 3.1.2 Roll out tends to be driven by the promoter's budget availability rather than of contractor(s) capability and/or capacity to deliver. In one case the scheme completed 300 properties in 2022 and there is an expectation to complete between 400 and 450 in each of the next two years. Another promotor is currently completing about 200 properties per annum through use of a single supplier. Volume is determined by budget spend, not contractor capacity.
- 3.1.3 One of those interviewed considered that it could provide sufficient capability and capacity for a single provider to deliver insulation at a rate of up to 50 homes per month. They also thought that by adding, a second contractor it would enable this volume to be doubled and having more than one contractor may also drive better quality through the introduction of competition.
- 3.1.4 One promoter writes three times to each eligible property owner and will not then do so again unless they receive a response. Housing associations are reported to be the most difficult to succeed with.
- 3.1.5 One promoter recorded the uptake by eligible owners at circa 50%, although since Covid-19 uptake is running at 25-30%. Another has been operating a Noise Insulation Scheme for 30 years and during that time the average take up has been between 50 and 60%. This is as low as 15% for the bedroom only schemes and up to 80% for the full package scheme (the equivalent of schemes 1 and 3 in the Applicant's Noise Insulation Scheme).
- 3.1.6 Promoters also reported that the time taken to complete each property differed depending on the specification of work required.
- 3.1.7 Energy reduction benefits are also achieved and often this aligns with other policies to upgrade local housing stock.
- 3.1.8 A lower take up can be experienced in areas of deprivation because owners think the offer is a scam, are generally less willing to engage, have more pressing concerns to deal with and do not attach any value to the offer. Promoters noted that many decide not to allow the survey and a smaller proportion chose not to go ahead after the survey.
- 3.1.9 The experience of others is that one of the real challenges in any attempt to accelerate delivery is down to delay caused by the homeowners who ultimately dictate the pace of the works. This might be due to the time it takes for them to accept the offer or when they decide to provide access for the contractors.
- 3.1.10 Promoters can experience issues with landlords who are slow to respond and add time to the period between offer and completion of works which in some cases is reported as being as long as up to two years.

- 3.1.11 Other promoters have found finding capable suppliers difficult, particularly with the need to maintain standards of delivery. Reputationally the quality of the workmanship is key.
- 3.1.12 In one example the management contractor has multiple suppliers available for the installation phase of the works.
- 3.1.13 Generally on noise insulation schemes a panel (in the case of the Proposed Development that would be provided by the Noise Insulation Sub-Committee of LLACC) will determine who should receive offers of insulation and this will weigh practical deliverability with those who are worst affected. Efficiency options are given to the panel, for example geographical clusters or property types.
- 3.1.14 The Applicant has analysed this feedback given by other promoters about noise insulation schemes they are operating across the UK. This has been informative for the Applicant and as a consequence, changes have been made to its draft Noise Insulation Scheme in the **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]**. Later in this document the Applicant has also set out how it is able to accelerate delivery of the Noise Insulation Scheme and how it will deal with challenges due to market supply.

4 MARKET ENGAGEMENT

4.1.1 The Applicant has considered options to accelerate the delivery the new noise insulation schemes planned as part of the Proposed Development. This is based on engagement with the market as well as assumptions taken from the 2027 core case noise contours and eligibility criteria set out in the **Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]** Initial engagement with the market has identified the delivery of these works would be dependent on a number of constraints including but not limited to:

- a. Availability of resources within the market.
- b. Up take of the schemes.
- c. Type and size of properties to be insulated.
- d. Engagement and response time from eligible properties.

4.1.2 The Applicant and airport operator are continuing to work with the market to understand the constraints and opportunities within the market in delivering this work. The table below provides an indication of the time it could be expected to take to complete to deliver the works proposed under the new Noise Insulation Scheme given potential to operate multiple teams.

Table 4.1 Noise Insulation Scheme – Indicative Programme

Scheme	Properties*	Time to Complete**
1	150	3 – 8 months
2	1,300	2 - 6 years
3	500	2 – 6 months
4	2,450	2 – 6 years
5	3,350	2 – 6 years
Ground	3,800***	2.5 - 7 years

* Assuming 100% take up

** Assuming multiple teams available to deliver the works

*** Worst-case estimate based on the noise assessment presented in Chapter 16 of the Environmental Statement [REP1-003]. This assessment is undertaken based on a single reasonable worst-case day (see paragraph 16.6.19 of Chapter 16). Numbers of eligible properties are likely to be lower when eligibility is determined based on actual ground movements and ground noise emissions.

- 4.1.3 This data is not at this stage a defined programme of works that the Applicant is proposing would be adopted. It is indicative and subject to change following further engagement with the market.
- 4.1.4 These timescales rely on a coordinated and proactive approach to maximise take up, but also upon homeowners engaging promptly with the process so that access for surveys, approval of works and entry to the property run smoothly.
- 4.1.5 The table above shows how, through the use of additional resources and introduction of multiples teams operating together, the delivery of Schemes 1, 2 and 3 could be achieved within four years of commencement of the Proposed Development.

5 NOISE EXPOSURE DATA

5.1 Environmental Statement noise contour data

5.1.1 **Table 5.1** and **Table 5.2** show the number of properties that would be eligible under each scheme in the Core case and Faster Growth case respectively using the noise modelling results from **Chapter 16** of the **Environmental Statement [REP1-003]**. As can be observed from the full assessment in Chapter 16, the noise contours shrink from 2027 to 2039 before growing again up to 2043. The communities within the various noise contours in 2043 are therefore generally the same as those in 2027 with some differences observed particularly at the lower contours. It therefore remains important that those identified as eligible for insulation in the early years of expansion are offered insulation even though noise levels are falling, to ensure that they are insulated before noise levels rise again post 2039.

Table 5.1: Core case – number of properties within insulation schemes

Scheme	2027	2039	2043
Scheme 1 (63dB _L A _{eq,16h})	150	100	200
Scheme 2 (60dB _L A _{eq,16h})	1300	1050	1350
Scheme 3 (55dB _L A _{eq,8h})	500	100	100
Scheme 4 (57dB _L A _{eq,16h})	2450	2650	2900
Scheme 5 (54dB _L A _{eq,16h})	3350	3100	3750
Total (Schemes 1-3)	1950	1250	1650
Total (All schemes)	7750	7000	8300

Table 5.2: Faster Growth case – number of properties within insulation schemes

Scheme	2027	2038	2042
Scheme 1 (63dB _L A _{eq,16h})	400	100	200
Scheme 2 (60dB _L A _{eq,16h})	1300	1100	1350
Scheme 3 (55dB _L A _{eq,8h})	650	50	100
Scheme 4 (57dB _L A _{eq,16h})	2550	2800	2900
Scheme 5 (54dB _L A _{eq,16h})	3950	3150	3750
Total (Schemes 1-3)	2350	1250	1650
Total (All schemes)	8850	7200	8300

5.2 Additional modelling noise contour data

5.2.1 Additional indicative forecasts have been produced for up to four years following 2027 (to align with the expected pace of rollout for schemes 1 to 3) and noise models have been run using these forecasts for the Core case and Faster Growth case (to quantify the likely and reasonable worst-case scenarios). **Table**

5.3 and **Table 5.4** present the data for the Core and Faster Growth cases respectively. These forecasts and models have been produced only for this illustrative analysis and do not form part of the Environmental Statement assessment.

Table 5.3: Core case – number of properties within insulation schemes, post 2027

Scheme	2027	2028	2029	2030
Scheme 1 (63dB _{L_{Aeq},16h})	150	100	50	50
Scheme 2 (60dB _{L_{Aeq},16h})	1300	950	950	950
Scheme 3 (55dB _{L_{Aeq},8h})	500	550	350	400
Scheme 4 (57dB _{L_{Aeq},16h})	2450	2400	2500	2400
Scheme 5 (54dB _{L_{Aeq},16h})	3350	2950	3000	2950
Total (Schemes 1-3)	1950	1500	1250	1400
Total (All schemes)	7750	6900	6850	6750

Table 5.4: Faster Growth case – number of properties within insulation schemes, post 2027

Scheme	2027	2028	2029	2030
Scheme 1 (63dB _{L_{Aeq},16h})	400	250	150	150
Scheme 2 (60dB _{L_{Aeq},16h})	1300	1250	1300	1250
Scheme 3 (55dB _{L_{Aeq},8h})	650	300	200	150
Scheme 4 (57dB _{L_{Aeq},16h})	2550	2700	2750	2800
Scheme 5 (54dB _{L_{Aeq},16h})	3950	3550	3450	3400
Total (Schemes 1-3)	2350	1800	1650	1550
Total (All schemes)	8850	8050	7850	7750

5.2.2 Post 2027 there is a general trend of reduction in the total number of households across all schemes for both the Core and Faster Growth cases, as the relatively small growth in this period (circa 5% increase in movements) is generally offset by the increase in proportion of new generation aircraft. The number of properties experiencing significant effects will therefore be reducing, and overall noise levels will be reducing, during the prioritised period of rollout of Noise Insulation Schemes 1 to 3.

6 SUMMARY

- 6.1.1 The Applicant has engaged with other promoters of similar noise insulation schemes to help address and respond to the ExA's question about the programme for delivery of the new Noise Insulation Scheme on implementation of the DCO.
- 6.1.2 The Applicant has also engaged with a supplier of noise insulation services for infrastructure schemes who has identified potential for accelerating the volume of properties that could be insulated in line with the proposed new scheme.
- 6.1.3 The Applicant has also commenced a process to market test the availability both of contractors with appropriate skills, and of access to the specialist glass and other products used for insulating against noise. This exercise is ongoing and the Applicant intends to share the results and an analysis of the results prior to the close of the examination.
- 6.1.4 It is evident that Noise Insulation Schemes that are in operation have generally been constrained by a financial cap on annual spend. The Applicant has also found evidence of limited supplies of specialist glass used for noise insulation which may place a limit on volumes delivered over time. Save for that it is becoming apparent that resources could be identified, procured and trained to roll out the proposed Noise Insulation Scheme.
- 6.1.5 The other issue that is identified which could slow down delivery is the response time and lack of response by homeowners to the offer being made. The Applicant has taken onboard lessons learned by others to develop an attractive scheme which for the worst affected, would be financially uncapped. Together with a proactive approach and with mechanisms in place to maximise take up, the Applicant will closely monitor progress and work with the community to educate the benefits and encourage groups who may have historically rejected support.
- 6.1.6 The Applicant has presented a **Funding Statement [APP-012]** which anticipates the cost to deliver the Noise Insulation Scheme weighted towards the early years of the Proposed Development and consistent with a commitment to roll out as quickly as reasonably practicable, particularly for those in Schemes 1, 2 and 3.
- 6.1.7 Based on the work to-date the Applicant can commit to making a formal invitation to participate to all owners of homes in schemes 1, 2 and 3 within three years. It is expected that installation will lag slightly behind the window in which offers are made but that with reciprocal commitment from homeowners the installation could be concluded within four years of commencement of the Proposed Development. As noted in Section 5, noise levels are predicted to be falling within this period.
- 6.1.8 The Applicant will commence invitations to participate on schemes 4, 5 and the ground noise schemes as soon as offers on the first three schemes have been completed so that the roll out continues without delay. Whilst the volumes of properties are higher in the wider contours, on account of the amount of time it is estimated it will take to complete the work required, the numbers of properties

insulated will naturally increase with the same number of contract resources deployed on the Proposed Development. It is also anticipated from the feedback the Applicant has received that the take up for the outer schemes will be lower and slower thus enabling the delivery of insulation promptly to those who respond to the offer expeditiously.

GLOSSARY AND ABBREVIATIONS

Term	Definition
dB	Decibel
DCO	Development Consent Order
LLACC	London Luton Airport Consultative Committee
SOAEL	Significant Observed Adverse Effect Level