

November 2023

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

8.74 Applicant's response to Written Questions - Noise

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.74

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.74 APPLICANT'S RESPONSE TO WRITTEN QUESTIONS -
NOISE**

Deadline:	Deadline 4
Planning Inspectorate Scheme Reference:	TR020001
Document Reference:	TR020001/APP/8.74
Author:	Luton Rising

Version	Date	Status of Version
Issue 1	November 2023	Additional Submission – Deadline 4

Contents

	Page
1 Response to Examining Authority written questions (Noise)	1
References	19
Appendix A - 1.16 Conversion between Integrated Noise Model and AEDT model	
Appendix B - Wizz Press Release	
Appendix C - easyJet Press Release	
Appendix D - BCLF Note	

1 RESPONSE TO EXAMINING AUTHORITY WRITTEN QUESTIONS (NOISE)

Table 1.1: Responses to the Examining Authority's Written Questions (Noise)

PINS ID	Question / Response
NO.1.1	<p>The Applicant notes that this question is directed to the Civil Aviation Authority and does not consider it necessary to provide a response at this time.</p> <p>Question:</p> <p>Statement of no impediments Confirm whether the CAA considers that it will be able to provide a 'no impediments statement' to the ExA in respect of the Proposed Development, as referenced in the CAA Policy on Minimum Standards for Noise Modelling (CAP2091) and whether the CAA has any comments on the noise modelling information, assumptions (including modal split) and monitoring presented or the appropriateness of the modelling approach set out in ES Chapter 16 [REP1-003], in particular Sections 6 to 9 ES Appendix 16.1 [AS-096]. <i>You may wish to link the answer to this question with your answer to AQ.1.5.</i></p>
NO.1.2	<p>The Applicant notes that this question is directed to the Civil Aviation Authority and does not consider it necessary to provide a response at this time.</p> <p>Question:</p> <p>Airspace Capacity Confirm whether the CAA has updated its position since submission of its Relevant Representation [RR-0257, paragraph 3.5] that states "We were not aware of any evidence within the consultation documents to conclude that the projected increase in air traffic movements as proposed by the DCO can be accommodated within the existing airspace structure". Paragraph 4.3 of the representation appears to reconfirm this position in relation to the DCO proposals.</p>
NO.1.3	<p>The Applicant notes that this question is directed to the Civil Aviation Authority and does not consider it necessary to provide a response at this time.</p> <p>Question:</p> <p>Independent Commission on Civil Aviation Noise (ICCAN) At D3 [REP3-113] the CAA provided a summary of ICCAN functions that the CAA would continue to perform. The letter makes reference to a number of outputs such as an Annual Report on UK aviation noise, aviation noise attitude surveys, noise action plans and work on metrics. Is the CAA able to confirm the programme for publication of any such documents that are likely to be of relevance to the Examination? If so, please submit copies as they become available.</p>
NO.1.4	<p>Question to the Applicant:</p> <p>Construction traffic - routeing (also raised under air quality) The outline CTMP [APP-130, Appendix 18.3] explains that whilst the majority of traffic would use the M1-A1081 to access the site, some use of the A602/ A505 corridor is anticipated. Explain what allowance has been included in the noise and vibration chapter to account for these movements and draw on evidence from distribution of construction traffic for Project Curium works to demonstrate why this pattern of movements provides a robust assumption for the Proposed Development. <i>You may wish to link the answer to this question with the answer to AQ.1.3.</i></p> <p>Response:</p> <p>As paragraph 16.9.67 of Chapter 16 of the Environmental Statement [REP1-003] notes, the primary access route to the Main Application Site would be via Junction 10 of the M1, along the A1081 (New Airport Way), then via President Way or the proposed Airport Access Road. Whilst there may be other access routes used by a small amount construction traffic, these routes will consist of heavily trafficked main roads that will be unaffected by the additional construction traffic and have not been considered further in the assessment.</p>

PINS ID	Question / Response
	<p>Paragraph 18.9.8 of Chapter 18 of the Environmental Statement [AS-030] identifies the section of A505 between its junctions with Gray's Lane and Park Way as the most sensitive section of road i.e. it is the section of road that could be used by construction traffic and has the lowest baseline flows. From 2016 baseline traffic data, this section of road has an Annual Average Weekday Traffic (AAWT) of 16,133 of which 1,150 are Heavy Goods Vehicles (HGVs).</p> <p>The greatest amount of average daily HGV movements occurs in assessment Phase 2a, where there are 342 average daily HGV movements in the peak quarter period. Assuming that every single one of these HGVs travelled to the Main Application Site using the A505 and none travelled via the primary access route then, following the methodology applied in Chapter 16 of the Environmental Statement [REP1-003] for construction traffic noise, this would result in an increase in traffic noise of 0.5dB, which is equivalent to a negligible impact and not significant.</p> <p>The approach to not consider potential impacts of construction traffic on the A602/A505 corridor is therefore considered appropriate and the conclusions in Chapter 16 of the Environmental Statement [REP1-003] are unchanged.</p> <p>The ES for Project Curium (LBC ref: 12/01400/FUL, ES Chapter 13 Ref 1) did not set out specific details of the distribution of construction traffic. The ES for Project Curium did state that to minimise the impact of construction vehicles accessing the site, vehicles would travel via designated sites to be agreed with relevant bodies including the highway authorities. The approach and use of designated routes for the Proposed Development is consistent with Project Curium and many other major projects.</p>
NO.1.5	<p>Question to the Applicant:</p> <p>Noise monitoring data The Applicant's post hearing notes for ISH3 [REP3-050] provides a response to Actions 5 and 13 providing additional information in respect of noise monitoring at ML2, ML15, ML26, ML28, ML29, ML41 and ML43. Explain why ML2 would not be affected by reflections from the low walls photographed and why ML41 would not be affected by reflections from the tree shown directly behind the sound level meter. Explain why Table 4.4 of ES Appendix 16.1 [AS-096] states that ML2 and ML15 were used to inform construction noise assessments, whereas the ambient noise monitoring data and survey sheets [AS-120] states that only ML15 was used.</p> <p>Response:</p> <p>With reference to the methodology for calculating the influence of reflection for outdoor noise propagation in ISO 9613 (Ref 2), it is considered that the contribution of reflections from the low walls near ML2 and the tree near ML42 can be neglected. This is due to:</p> <ol style="list-style-type: none"> for both ML2 and M42, the low sound reflection coefficient of these predominantly open structures; for both ML2 and ML42, the relatively small dimensions of the reflective surfaces; and for ML2 there is no specular reflection path between the source and receiver. <p>ML2 was included in Table 4.4 of Appendix 16.1 of the Environmental Statement [AS-096] erroneously. This will be recorded in an update to the Errata Report [REP1-015] to be submitted at Deadline 5. The Ambient noise monitoring data and survey sheets [AS-120] document is correct that only ML15 has been used in the construction noise assessment.</p>
NO.1.6	<p>Question to the Applicant:</p> <p>Construction traffic – data The ExA has identified several apparent discrepancies between the traffic data set out in ES Chapter 18 [AS-030] and data referenced in Appendix 18.3 [APP-130, Table 4.1], the noise assessment [REP1-003, Chapter 16] and air quality assessments [AS-028, Appendix 7.1, Table 3.22]. Specifically, the vehicle movements presented in:</p> <ul style="list-style-type: none"> • Table 4.1 vs ES paragraph 18.9.4 vs ES 16.9.71 vs Table 3.22; • Table 4.1 vs ES paragraph 18.9.45 vs ES paragraph 16.9.71 vs Table 3.22; and • Table 4.1 vs ES paragraph 18.9.102 vs ES paragraph 16.9.71 vs Table 3.22.

PINS ID	Question / Response																				
	<p>Provide confirmation of the correct vehicle movement numbers, taking into account any variations due to the transport rescoping work, and update any dependent assessments where relevant.</p> <p>Response:</p> <p>Differences between Table 4.1 of Appendix 18.3 of the Environmental Statement [APP-130] and traffic data set out in ES Chapter 18 [AS-030]</p> <p>The construction traffic data for external activity was provided as the number of vehicles visiting the site for each quarter year period when construction would be taking place. That information is presented in a visual form in Inset 18.1 of Chapter 18 of the Environmental Statement [AS-030]. The daily rate shown in that diagram is obtained by dividing the total vehicles for each quarter by 65 (the typical number of working days in a quarter). In Appendix 18.3 of the Environmental Statement [APP-130], the quarterly figures used to produce Inset 18.1 of Chapter 18 of the Environmental Statement [AS-030] were amalgamated to show the annual figures that are displayed as the histogram in Inset 4.1. The original quarter year values that were provided are used to create the figures that are presented in Table 4.1. Since these values are for vehicles visiting the Site it was necessary to multiply these by two to establish the estimates for traffic movements on the highway network.</p> <p>Differences between traffic data set out in Environmental Statement Chapter 18 [AS-030] and Environmental Statement Chapter 16 [REP1-003]</p> <p>The construction traffic numbers listed in paragraphs 16.9.71, 16.9.73 and 16.9.75 of Chapter 16 of the Environmental Statement [REP1-003] were mistakenly transcribed from an earlier calculation iteration. The final calculation iteration is provided in the table below, which results in the same conclusions as those presented in Chapter 16 [REP1-003]. This will be recorded in an update to the Errata Report [REP1-015] to be submitted at Deadline 5.</p> <table border="1" data-bbox="362 1094 2303 1346"> <thead> <tr> <th></th> <th>Number of HGVs (earlier calculation iteration)</th> <th>Number of HGVs (final calculation)</th> <th>Resulting noise increase (earlier calculation iteration)</th> <th>Resulting noise increase (final calculation)</th> </tr> </thead> <tbody> <tr> <td>Assessment Phase 1</td> <td>97</td> <td>100</td> <td>0.4dB</td> <td>0.4dB</td> </tr> <tr> <td>Assessment Phase 2a</td> <td>198</td> <td>171</td> <td>0.5dB</td> <td>0.5dB</td> </tr> <tr> <td>Assessment Phase 2b</td> <td>127</td> <td>108</td> <td>0.6dB</td> <td>0.5dB</td> </tr> </tbody> </table> <p>Differences between traffic data set out in Environmental Statement Chapter 16 [REP1-003] and Appendix 7.1 of the Environmental Statement [AS-028]</p> <p>The construction traffic noise assessment represents a reasonable worst-case, so construction traffic movements for the average day during the peak quarter period are used to identify likely significant effects. This differs from the air quality assessment, which uses the annual construction traffic movements (annual average daily traffic (AADT)) from the peak construction calendar year from each phase, considered to be the reasonable worst-case for the air quality assessment.</p>		Number of HGVs (earlier calculation iteration)	Number of HGVs (final calculation)	Resulting noise increase (earlier calculation iteration)	Resulting noise increase (final calculation)	Assessment Phase 1	97	100	0.4dB	0.4dB	Assessment Phase 2a	198	171	0.5dB	0.5dB	Assessment Phase 2b	127	108	0.6dB	0.5dB
	Number of HGVs (earlier calculation iteration)	Number of HGVs (final calculation)	Resulting noise increase (earlier calculation iteration)	Resulting noise increase (final calculation)																	
Assessment Phase 1	97	100	0.4dB	0.4dB																	
Assessment Phase 2a	198	171	0.5dB	0.5dB																	
Assessment Phase 2b	127	108	0.6dB	0.5dB																	
NO.1.7	<p>Question to the Applicant:</p> <p>Future baseline noise levels The operational traffic noise and fixed plant assessments rely on future assessments to conclude whether noise insulation would be required and the noise levels to be achieved at the boundary. Explain how the monitoring and mitigation approach would ensure that 'creep' in the baseline noise levels (due to an expanded airport) would not avoid, limit or reduce the noise mitigation requirements in future scenarios.</p> <p>Response:</p>																				

PINS ID	Question / Response
	<p>As it is not possible to measure the situation with and without the Proposed Development in a given future year, eligibility for the operational traffic noise insulation scheme will be determined based on modelling and a comparison of the modelled Do-Minimum to the modelled Do-Something scenario. The Do-Minimum scenario is the scenario assessed in the Environmental Statement without the Proposed Development and so is not influenced by changes in the baseline noise levels due to an expanded airport. The Do-Something scenario will be updated based on traffic surveys and monitoring of traffic volumes. As this monitoring is based on traffic volume, not noise levels, it is not affected by changes in baseline noise level. This mechanism for remodelling is described in Section 4.2 of Appendix 16.2 of the Environmental Statement [APP-111].</p> <p>For fixed plant noise, the rating level design objective in the Fixed Noise Management Plan [TR020001/APP/5.02] has been updated to be 10dB below the L_{A90} background sound level for Deadline 4. This would avoid items of fixed plant themselves contributing to a potential increase in background sound level over time. Furthermore, the intention was always that the surveys to determine the background sound levels for the relevant assessment criteria would be undertaken at a single point in time, at the time of detailed design of the Proposed Development, rather than being repeatedly measured over time which could allow for potential gradual increases in background sound levels over time and hence increases in the assessment criteria. The text at paragraph 2.25 of the Fixed Plant Noise Management Plan has been updated to clarify this as follows:</p> <p><i>So that the relevant background sound levels are established using up to date information, the surveys used to define the background sound levels will be carried out at the time of detailed design of the fixed plant systems, or before 12 months has passed since serving notice on the relevant planning authority under article 44(3) of the DCO, whichever comes first.</i></p>
NO.1.8	<p>Question to the Applicant:</p> <p>2013 baseline comparison</p> <p>Paragraph 5.58 of the Airports National Policy Statement (ANPS) requires that <i>“The noise mitigation measures should ensure the impact of aircraft noise is limited and, where possible, reduced compared to the 2013 baseline assessed by the Airports Commission”</i>. Acknowledging that the Airports Commission focussed specifically on Heathrow, expand on the response in ISH3 post hearing submission [REP3-050] explaining how the Proposed Development otherwise meets this policy requirement.</p> <p><i>You may wish to link the answer to this question with the answer to question NO.1.9.</i></p> <p>Response:</p> <p>The overall aviation noise objective from the Aviation Policy Framework (Ref 3) through to the Overarching Aviation Noise Policy Statement (OANPS, Ref 4) is to limit, and where possible reduce, the total adverse impacts on health and quality of life from aviation noise. The evolution of this objective is described in Section 2 and how the Proposed Development complies with this objective is summarised in Section 3 of Commentary on the Overarching Aviation Noise Policy [REP1-012]. It is important to note that the OANPS confirms the government’s policy that <i>“We consider that “limit, and where possible reduce” remains appropriate wording. An overall reduction in total adverse effects is desirable, but in the context of sustainable growth an increase in total adverse effects may be offset by an increase in economic and consumer benefits. In circumstances where there is an increase in total adverse effects, “limit” would mean to mitigate and minimise adverse effects, in line with the Noise Policy Statement for England.”</i> (NPSE).</p> <p>As described in the Planning Statement [AS-122], the embedded noise management measures as secured by the Noise Envelope within the Green Controlled Growth Framework [REP3-017] have been developed so that, in combination with the compensatory mitigation measures for the Proposed Development (Draft Compensation Policies Measures and Community First [REP2-005]), they meet the NPSE and the aviation policy objective to limit, and where possible reduce, the total adverse impacts on health and quality of life from aviation noise.</p> <p>Whilst the Airports National Policy Statement (ANPS, Ref 5) has no effect for the Proposed Development and paragraph 5.58 of the ANPS is specific to Heathrow and the Airports Commission, the ANPS is an important and relevant consideration (as confirmed in paragraph 1.12 of the ANPS) and paragraph 5.58 provides clarity that the aviation policy objective should be tested, at least in part, in relation to a historic baseline. The footnote to ANPS paragraph 5.58 (footnote 155) clarifies that the 2013 baseline for this test is defined by the 54dB_{L_{Aeq,16h}} daytime contour.</p>

PINS ID	Question / Response																																																
	<p>As the 2013 baseline is specific to Heathrow and the Airports Commission, it is considered that the 2019 baseline used in the Environmental Statement is the appropriate historic baseline to use. This is why, for aircraft air and ground noise, the assessment compares the Do-Something scenario in each year to the 2019 Actuals baseline (or the 2019 Consented baseline in the sensitivity test).</p> <p>The results of this comparison are presented in Table 12.7, 12.9 and 12.10 of Appendix 16.1 of the Environmental Statement [AS-096] and (together with the tables in Section 7.9 of the same appendix), show that for the daytime 54dBL_{Aeq,16h} contour:</p> <ul style="list-style-type: none"> a. by comparison to the 2019 Actuals baseline, the adverse impacts on health and quality of life from aviation noise are limited and reduced for all assessment phases; b. by comparison to the 2019 Consented baseline, the adverse impacts on health and quality of life from aviation noise are limited and reduced for all assessment phases; c. by comparison to 2016 actuals (see response to NO.1.9), the adverse impacts on health and quality of life from aviation noise are limited and reduced for all assessment phases. <p>Though the 2013 baseline test in the ANPS is defined only in terms of daytime, a comparison for night-time has also been undertaken and shows that for the night-time LOAEL (45dBL_{Aeq,8h}) and SOAEL (55dBL_{Aeq,8h}) contours:</p> <ul style="list-style-type: none"> a. by comparison to the 2019 Actuals baseline, the adverse impacts on health and quality of life from aviation noise are limited and reduced for all assessment phases; b. by comparison to the 2019 Consented baseline, the adverse impacts on health and quality of life from aviation noise are limited and reduced for assessment phase 2a; d. by comparison to the 2019 Consented baseline, the adverse impacts on health and quality of life from aviation noise are limited, but not reduced, for assessment phase 1 and 2b; e. by comparison to 2016 actuals (see response to NO.1.9), the adverse impacts on health and quality of life from aviation noise are limited and reduced for assessment phase 2a; f. by comparison to 2016 actuals (see response to NO.1.9), the adverse impacts on health and quality of life from aviation noise are limited, but not reduced, for assessment phase 1 and 2b. <p>Data for the above comparisons are summarised in the table below.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="background-color: #2c3e50; color: white;">Noise contour</th> <th colspan="6" style="background-color: #2c3e50; color: white;">Population</th> </tr> <tr> <th style="background-color: #2c3e50; color: white;">2016 Actuals</th> <th style="background-color: #2c3e50; color: white;">2019 Consented</th> <th style="background-color: #2c3e50; color: white;">2019 Actuals</th> <th style="background-color: #2c3e50; color: white;">2027 DS</th> <th style="background-color: #2c3e50; color: white;">2039 DS</th> <th style="background-color: #2c3e50; color: white;">2043 DS</th> </tr> </thead> <tbody> <tr> <td colspan="7" style="background-color: #2c3e50; color: white;">Daytime</td> </tr> <tr> <td>54dBL_{Aeq,16h}</td> <td>18,300</td> <td>19,050</td> <td>21,650</td> <td>15,500</td> <td>13,850</td> <td>16,500</td> </tr> <tr> <td colspan="7" style="background-color: #2c3e50; color: white;">Night-time</td> </tr> <tr> <td>45dBL_{Aeq,8h}</td> <td>55,050</td> <td>55,150</td> <td>67,800</td> <td>55,850</td> <td>54,950</td> <td>62,800</td> </tr> <tr> <td>55dBL_{Aeq,8h}</td> <td>3,100</td> <td>3,100</td> <td>4,950</td> <td>3,800</td> <td>2,600</td> <td>3,250</td> </tr> </tbody> </table> <p>With respect to the night-time adverse effects, as noted in the Planning Statement [AS-122] and Commentary on the Overarching Aviation Noise Policy [REP1-012], the noise insulation scheme, with its night-time eligibility, will avoid all significant effects on health and quality of life during the night-time. Furthermore, in line with the principles of the OANPS, the total adverse effects of noise are counterbalanced by the increased economic and consumer benefits delivered by the Proposed Development.</p>	Noise contour	Population						2016 Actuals	2019 Consented	2019 Actuals	2027 DS	2039 DS	2043 DS	Daytime							54dBL _{Aeq,16h}	18,300	19,050	21,650	15,500	13,850	16,500	Night-time							45dBL _{Aeq,8h}	55,050	55,150	67,800	55,850	54,950	62,800	55dBL _{Aeq,8h}	3,100	3,100	4,950	3,800	2,600	3,250
Noise contour	Population																																																
	2016 Actuals	2019 Consented	2019 Actuals	2027 DS	2039 DS	2043 DS																																											
Daytime																																																	
54dBL _{Aeq,16h}	18,300	19,050	21,650	15,500	13,850	16,500																																											
Night-time																																																	
45dBL _{Aeq,8h}	55,050	55,150	67,800	55,850	54,950	62,800																																											
55dBL _{Aeq,8h}	3,100	3,100	4,950	3,800	2,600	3,250																																											
NO.1.9	Question to the Applicant:																																																

PINS ID	Question / Response																																		
	<p>2019 actuals baseline</p> <p>ES Chapter 16 [REP1-003, paragraph 16.9.8] explains that the 2019 actuals baseline determines the number of properties last experiencing significant adverse effects on health and quality of life. This is used for comparison purposes against future scenarios. Explain how the figures for changes in total population exposure would differ if the last year of noise contour compliant operation (2016) were adopted as a comparator rather than the 2019 actuals or consented baseline datasets.</p> <p>Response:</p> <p>The 2016 actuals fleet has been modelled in AEDT following the modelling methodology described in Appendix 16.1 of the ES [AS-096] and population analysis of noise contours is provided in the tables below.</p> <table border="1" data-bbox="362 634 1338 1033"> <thead> <tr> <th style="background-color: #2c3e50; color: white;">Daytime L_{Aeq,16h} dB Noise Contour</th> <th style="background-color: #2c3e50; color: white;">2016 Actuals Population</th> </tr> </thead> <tbody> <tr><td>51</td><td>36,400</td></tr> <tr><td>54</td><td>18,300</td></tr> <tr><td>57</td><td>10,400</td></tr> <tr><td>60</td><td>4,200</td></tr> <tr><td>63</td><td>1,250</td></tr> <tr><td>66</td><td>0</td></tr> <tr><td>69</td><td>0</td></tr> </tbody> </table> <table border="1" data-bbox="362 1079 1338 1524"> <thead> <tr> <th style="background-color: #2c3e50; color: white;">Night-time L_{Aeq,8h} dB Noise Contour</th> <th style="background-color: #2c3e50; color: white;">2016 Actuals Population</th> </tr> </thead> <tbody> <tr><td>45</td><td>55,050</td></tr> <tr><td>48</td><td>20,750</td></tr> <tr><td>51</td><td>10,850</td></tr> <tr><td>54</td><td>4,650</td></tr> <tr><td>55</td><td>3,100</td></tr> <tr><td>57</td><td>1,500</td></tr> <tr><td>60</td><td>0</td></tr> <tr><td>63</td><td>0</td></tr> </tbody> </table> <p>A summary of population within the assessment Phase 1 2027 Lowest Observed Adverse Effect Level (LOAEL), Significant Observed Adverse Effect Level (SOAEL) and Unacceptable Adverse Effect Level (UAEL) contours is provided in table below for the 2016 Actuals Baseline, Do-Minimum (DM) and Do-Something (DS) scenarios. The figures are comparable with 2019 Consented baseline population analysis in Table 12.7 of Appendix 16.1 of the Environmental Statement [AS-096] with the only identified difference being:</p> <ul style="list-style-type: none"> a. 100 fewer people being no longer above the daytime LOAEL by comparison to 2016 actuals; and g. 100 additional people being newly exposed to noise levels above night-time LOAEL by comparison to 2016 actuals. <p>No change in population exposed to noise levels above SOAEL or UAEL are identified. Cells where there are differences compared to Table 12.7 of Appendix 16.1 of the Environmental Statement [AS-096] are highlighted and the equivalent number from Table 12.7 is included in brackets.</p>	Daytime L _{Aeq,16h} dB Noise Contour	2016 Actuals Population	51	36,400	54	18,300	57	10,400	60	4,200	63	1,250	66	0	69	0	Night-time L _{Aeq,8h} dB Noise Contour	2016 Actuals Population	45	55,050	48	20,750	51	10,850	54	4,650	55	3,100	57	1,500	60	0	63	0
Daytime L _{Aeq,16h} dB Noise Contour	2016 Actuals Population																																		
51	36,400																																		
54	18,300																																		
57	10,400																																		
60	4,200																																		
63	1,250																																		
66	0																																		
69	0																																		
Night-time L _{Aeq,8h} dB Noise Contour	2016 Actuals Population																																		
45	55,050																																		
48	20,750																																		
51	10,850																																		
54	4,650																																		
55	3,100																																		
57	1,500																																		
60	0																																		
63	0																																		

PINS ID **Question / Response**

Total Population					
Noise exposure	2016 Actuals	2027 DM	2027 DS	Change DS – 2016 Actuals	Change DS - DM
Daytime					
Above LOAEL and below SOAEL	35,150	25,000	31,600	-3,550 (-3,650)	6,600
Above SOAEL and below UAEL	1,250	50	450	-800	400
Newly above the SOAEL in DS compared to the 2016 Actuals Baseline			0		
Above UAEL	0	0	0	0	0
Night-time					
Above LOAEL and below SOAEL	51,950	38,350	52,050	100 (0)	13,700
Above SOAEL and below UAEL	3,100	2,100	3,800	700	1,700
Newly above the SOAEL in DS compared to the 2016 Actuals Baseline			700		
Above UAEL	0	0	0	0	0

A summary of population within the Phase 2a 2039 LOAEL, SOAEL and UAEL contours is provided in table below for the 2016 Actuals baseline, DM and DS scenarios. The figures are comparable with 2019 Consented baseline population analysis in Table 12.9 of **Appendix 16.1** of the **Environmental Statement [AS-096]** with the only identified difference being:

- a. 100 fewer people being no longer above the daytime LOAEL by comparison to 2016 actuals; and
- h. 100 additional people being newly exposed to noise levels above night-time LOAEL by comparison to 2016 actuals.

No change in population exposed to noise levels above SOAEL or UAEL are identified. Cells where there are differences compared to Table 12.7 of **Appendix 16.1** of the **Environmental Statement [AS-096]** are highlighted and the equivalent number from Table 12.7 is included in brackets.

PINS ID **Question / Response**

Noise exposure	Total Population				
	2016 Actuals	2039 DM	2039 DS	Change DS – 2016 Actuals	Change DS - DM
Daytime					
Above LOAEL and below SOAEL	35,150	20,100	30,800	-4,350 (-4,450)	10,700
Above SOAEL and below UAEL	1,250	0	200	-1,050	200
Newly above the SOAEL in DS compared to the 2016 Actuals Baseline			0		
Above UAEL	0	0	0	0	0
Night-time					
Above LOAEL and below SOAEL	51,950	32,850	52,350	400 (300)	19,500
Above SOAEL and below UAEL	3,100	1,500	2,600	-500	1,100
Newly above the SOAEL in DS compared to the 2016 Actuals Baseline			0		
Above UAEL	0	0	0	0	0

A summary of population within the Phase 2b 2043 LOAEL, SOAEL and UAEL contours is provided in table below for the 2016 Actuals baseline, DM and DS scenarios. The figures are comparable with 2019 Consented baseline population analysis in Table 12.10 of **Appendix 16.1** of the **Environmental Statement [AS-096]** with the only identified difference being:

- a. 100 additional people being newly exposed to noise levels above daytime LOAEL by comparison to 2016 actuals; and
- i. 100 additional people being newly exposed to noise levels above night-time LOAEL by comparison to 2016 actuals.

No change in population exposed to noise levels above SOAEL or UAEL are identified. Cells where there are differences compared to Table 12.7 of **Appendix 16.1** of the **Environmental Statement [AS-096]** are highlighted and the equivalent number from Table 12.7 is included in brackets

PINS ID	Question / Response																																																																											
	<table border="1"> <thead> <tr> <th rowspan="2" style="background-color: #2c3e50; color: white;">Noise exposure</th> <th colspan="5" style="background-color: #2c3e50; color: white;">Total Population</th> </tr> <tr> <th style="background-color: #2c3e50; color: white;">2016 Actuals</th> <th style="background-color: #2c3e50; color: white;">2043 DM</th> <th style="background-color: #2c3e50; color: white;">2043 DS</th> <th style="background-color: #2c3e50; color: white;">Change DS – 2016 Actuals</th> <th style="background-color: #2c3e50; color: white;">Change DS - DM</th> </tr> </thead> <tbody> <tr> <td colspan="6" style="background-color: #2c3e50; color: white;">Daytime</td> </tr> <tr> <td style="background-color: #2c3e50; color: white;">Above LOAEL and below SOAEL</td> <td>35,150</td> <td>19,950</td> <td>38,250</td> <td>3,100 (3,000)</td> <td>18,300</td> </tr> <tr> <td style="background-color: #2c3e50; color: white;">Above SOAEL and below UAEL</td> <td>1,250</td> <td>0</td> <td>500</td> <td>-750</td> <td>500</td> </tr> <tr> <td style="background-color: #2c3e50; color: white;">Newly above the SOAEL in DS compared to the 2016 Actuals Baseline</td> <td></td> <td></td> <td>0</td> <td></td> <td></td> </tr> <tr> <td style="background-color: #2c3e50; color: white;">Above UAEL</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td colspan="6" style="background-color: #2c3e50; color: white;">Night-time</td> </tr> <tr> <td style="background-color: #2c3e50; color: white;">Above LOAEL and below SOAEL</td> <td>51,950</td> <td>32,400</td> <td>59,550</td> <td>7,600 (7,500)</td> <td>27,150</td> </tr> <tr> <td style="background-color: #2c3e50; color: white;">Above SOAEL and below UAEL</td> <td>3,100</td> <td>1,350</td> <td>3,250</td> <td>150</td> <td>1,900</td> </tr> <tr> <td style="background-color: #2c3e50; color: white;">Newly above the SOAEL in DS compared to the 2016 Actuals Baseline</td> <td></td> <td></td> <td>150</td> <td></td> <td></td> </tr> <tr> <td style="background-color: #2c3e50; color: white;">Above UAEL</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>					Noise exposure	Total Population					2016 Actuals	2043 DM	2043 DS	Change DS – 2016 Actuals	Change DS - DM	Daytime						Above LOAEL and below SOAEL	35,150	19,950	38,250	3,100 (3,000)	18,300	Above SOAEL and below UAEL	1,250	0	500	-750	500	Newly above the SOAEL in DS compared to the 2016 Actuals Baseline			0			Above UAEL	0	0	0	0	0	Night-time						Above LOAEL and below SOAEL	51,950	32,400	59,550	7,600 (7,500)	27,150	Above SOAEL and below UAEL	3,100	1,350	3,250	150	1,900	Newly above the SOAEL in DS compared to the 2016 Actuals Baseline			150			Above UAEL	0	0	0	0	0
Noise exposure	Total Population																																																																											
	2016 Actuals	2043 DM	2043 DS	Change DS – 2016 Actuals	Change DS - DM																																																																							
Daytime																																																																												
Above LOAEL and below SOAEL	35,150	19,950	38,250	3,100 (3,000)	18,300																																																																							
Above SOAEL and below UAEL	1,250	0	500	-750	500																																																																							
Newly above the SOAEL in DS compared to the 2016 Actuals Baseline			0																																																																									
Above UAEL	0	0	0	0	0																																																																							
Night-time																																																																												
Above LOAEL and below SOAEL	51,950	32,400	59,550	7,600 (7,500)	27,150																																																																							
Above SOAEL and below UAEL	3,100	1,350	3,250	150	1,900																																																																							
Newly above the SOAEL in DS compared to the 2016 Actuals Baseline			150																																																																									
Above UAEL	0	0	0	0	0																																																																							
NO.1.10	<p>Question to the Applicant:</p> <p>Surface access noise ES Appendix 18.2 [APP-129, Table 1.4] highlights an increase in 2039 PM peak flows of 825.7%. Confirm whether this is a typographic error or explain what the cause of this increase is. Similarly, Brendon Avenue (between Eaton Green Road and Fermor Crescent; and between Fermor Crescent and Crawley Green Road) is predicted to experience increases in 2039 AM (07:00-10:00) peak flows of 140-156% and PM (16:00-19:00) peak flows of 149-163%. For both locations in light of more than doubling traffic flows, which</p>																																																																											

PINS ID	Question / Response
	<p>equates to at least 3dB increase in noise levels, explain whether there is potential for a significant adverse noise effect requiring mitigation and if so, what would this be and how would it be secured?</p> <p>Response:</p> <p>Lalleford Road between Eaton Green Road and Lyneham Road The 2039 data shows an increase of 825.7% in the PM peak hour. This increase is a function of the very low future baseline flow (31 vehicles) in the PM peak hour which increases to 291 vehicles with the Proposed Development. Conversely, it is noted that in the AM peak there is a similar reduction from 236 vehicles in the future baseline to 27 vehicles with the Proposed Development. When considered across the day, the Annual Average Daily Traffic (AADT) flows on Lalleford Road between Eaton Green Road and Lyneham Road are forecast to increase by around 19% in 2039. This increase in traffic flow is taken into account in the surface access noise modelling and constitutes a road traffic noise increase of less than 1 dB so no significant adverse noise effects are identified as a result of traffic increases on Lalleford Rd.</p> <p>Brendon Avenue (between Eaton Green Road and Fermor Crescent; and between Fermor Crescent and Crawley Green Road) The 2039 percentage increases referred to in NO.1.10 are correct but relate to the AM (08:00-09:00) and PM (17:00-18:00) peak hours. When considered across the day traffic flows (AADT) increase by between 63%-75%. Due to the low levels of baseline traffic and the low likelihood of an adverse environmental effect, in accordance with paragraph 2.2.3 of Appendix 18.1 of the Environmental Statement [APP-128], Brendon Avenue was not considered within the environmental assessments. An increase in traffic volume of 63%-75% would lead to an increase in road traffic noise of around 2-2.5 dB, which coupled with the low volume (and therefore low road traffic noise) on Brendon Avenue would not lead to significant adverse noise effects from road traffic.</p>
NO.1.11	<p>Question to the Applicant:</p> <p>Future fleetmix – larger aircraft Explain whether use of larger aircraft in future scenarios would lead to different modes of operation at the airport e.g. due to runway length or flight profiles and if so how would this effect the conclusions of the ES?</p> <p>Response: The runway mode would not be impacted by any use of larger aircraft as the mode is dictated by the wind direction, not the aircraft type. Any assumptions about larger aircraft and their ability to use the runways at Luton are based on the capabilities of these aircraft to use the runway in either direction so that, regardless of the wind direction, the aircraft could take off and land into the wind. There is therefore no impact on the conclusions of the Environmental Statement.</p>
NO.1.12	<p>Question to the Applicant:</p> <p>Future fleetmix – assumptions regarding new generation aircraft REP1-023, 8.31 states in response to RR-1416 that fleetmix comprises 31% new generation aircraft in 2023, whereas in response to RR-0226 a figure of 40% is used. Confirm which figure is correct and amend as necessary.</p> <p>Response: Both figures are correct but are quantifying the proportion of new generation aircraft in different ways, 31% refers to the actual position in August 2023 as stated, whereas 40% reflects the expectation for the full year 2023 based on airlines stated intentions to the airport operator and their known schedules.</p>
NO.1.13	<p>Question to the Applicant:</p> <p>Future fleetmix assumptions – next generation</p>

PINS ID	Question / Response																								
	<p>With reference to CAP1766 'Emerging Aircraft Technologies and their potential noise impact', explain why an assumption of next generation noise levels being less than or the same as new generation aircraft is robust.</p> <p>Response:</p> <p>CAP1766 'Emerging Aircraft Technologies and their potential noise impact' (Ref 6) was one of the Civil Aviation Authority publications linked to the Department for Transport's aviation strategy consultations (Ref 7), along with CAP1731 Aviation Strategy: Noise Forecast and Analyses (Ref 8). CAP1766 provides high level commentary on noise implications of emerging aircraft technologies such as electric aircraft, supersonic aircraft, unmanned aircraft systems and spacecraft. Of these technologies, only electric aircraft are likely to have the potential for use at London Luton Airport in significant numbers. Whilst the report notes that there is a risk of potential adverse noise impacts of electric aircraft (which could vary with noise levels potentially reduced on departure but increased on arrival), no definitive statements are made and the uncertainties are noted.</p> <p>Published around the same time and as part of the same aviation strategy consultations, CAP1731 Aviation Strategy: Noise Forecast and Analyses provides forecast noise modelling out to 2050, with consideration of the noise impacts of future aircraft types. For these long-term forecasts, the Civil Aviation Authority assumed either a 0.1dB or 0.3dB per year reduction due to future aircraft types, based on a review of novel aircraft noise technology by the International Civil Aviation Organization (Ref 9). This assumption is consistent with the assumptions applied in the sensitivity test for next-generation aircraft presented in Section 12.6 of Appendix 16.1 of the Environmental Statement [AS-096]. Assumptions on reductions in noise from next-generation aircraft are only employed in a sensitivity test.</p> <p>For the reasons described above, it is therefore considered that the assumption that next-generation aircraft are no louder than new-generation aircraft is considered robust and a reasonable worst-case, as the assumption means that Noise Envelope Limits are set to be equivalent to those of new-generation aircraft in any case.</p>																								
NO.1.14	<p>Question to the Applicant:</p> <p>Future fleetmix assumptions – corrections ES Appendix 16.1 [AS-096, Table 6.2] sets out corrections applied to different aircraft but excludes the Boeing 737 max on the basis that it was not operating in 2019. Now that Boeing 737 max aircraft are operating at Luton, provide monitoring data to support the use of the default data and profiles in the Aviation Environment Design Tool (AEDT).</p> <p>Response:</p> <p>Measured noise data collected over the 2022 92-day summer period from monitoring locations NMT1 and NMT2 has been used to support the use of default B737Max data and profiles for noise predictions in the AEDT noise model. NMT1 measures noise from both approaches and departures, and NMT2 measures noise from departures only. A summary of the measured 50th percentile Sound Exposure Level (SEL) from individual B737Max movements and a comparison against predicted B737Max noise levels in AEDT are presented in the table below. The results show a good correlation with predicted B737Max SEL predictions being within 1dB of measured SELs.</p> <table border="1" data-bbox="362 1423 2101 1640"> <thead> <tr> <th>Monitoring Location</th> <th>Measurement Data Samples</th> <th>Operation</th> <th>Measured 50th Percentile SEL dB</th> <th>Predicted SEL dB</th> <th>Difference dB</th> </tr> </thead> <tbody> <tr> <td>NMT1_A</td> <td>126</td> <td>Approach</td> <td>83.2</td> <td>84.0</td> <td>+0.8</td> </tr> <tr> <td>NMT1_D</td> <td>82</td> <td>Departure</td> <td>81.8</td> <td>82.7</td> <td>+0.9</td> </tr> <tr> <td>NMT2</td> <td>118</td> <td>Departure</td> <td>81.0</td> <td>81.6</td> <td>+0.6</td> </tr> </tbody> </table>	Monitoring Location	Measurement Data Samples	Operation	Measured 50th Percentile SEL dB	Predicted SEL dB	Difference dB	NMT1_A	126	Approach	83.2	84.0	+0.8	NMT1_D	82	Departure	81.8	82.7	+0.9	NMT2	118	Departure	81.0	81.6	+0.6
Monitoring Location	Measurement Data Samples	Operation	Measured 50th Percentile SEL dB	Predicted SEL dB	Difference dB																				
NMT1_A	126	Approach	83.2	84.0	+0.8																				
NMT1_D	82	Departure	81.8	82.7	+0.9																				
NMT2	118	Departure	81.0	81.6	+0.6																				
NO.1.15	<p>Question to the Applicant:</p> <p>Future fleetmix assumptions – load factors Confirm how the modelled flight departure profiles [AS-096, Section 6] in future years account for potential changes in load factors due to increased passenger numbers.</p> <p>Response:</p>																								

PINS ID	Question / Response
	<p>Aircraft weight is accounted for in the AEDT noise model through the setting of 'stage lengths'; the higher the stage length, the further the departing aircraft needs to travel before it reaches its destination. AEDT assumes a load factor of 65% when determining aircraft weights for each stage length. Aircraft are influenced by load factor as heavier aircraft take longer to ascend and take long to attain speed. Aircraft weight is inherently considered in the validation process through consideration of departure altitude and ground speed profiles as presented in Inset 6.24 to 6.29 of Appendix 16.1 of the Environmental Statement [AS-096]. If aircraft load factors were to increase in future, the annual updates to the noise model validation as secured in the Aircraft Noise Monitoring Plan [REP3-023] would capture these aircraft weight increases through analysis of altitude and ground speed profiles.</p>
NO.1.16	<p>Question to the Applicant:</p> <p>Conversion between Integrated Noise Model (INM) and AEDT model ES Appendix 16.1 [AS-096, section 6.16] explains that INM contour area limits show a relatively good fit with AEDT contour area limits, although there is some difference for 25 departure routes. This is assumed to be acceptable on the basis that 2019 radar data shows good correlation between departure profiles on both runways. Is radar data available for other years to support this assumption?</p> <p>Response:</p> <p>A response to this question has been provided in Applicant's response to Written Questions - Noise & Vibration - Appendix A - 1.16 Conversion between Integrated Noise Model (INM) and AEDT model [TR020001/APP/8.74].</p>
NO.1.17	<p>Question to the Applicant:</p> <p>Cumulative impacts ISH3 post hearing submission [REP3-050] implies that noise of overflight from multiple airports was addressed in ES Chapter 21 [AS-032]. Can the Applicant signpost to where the assessment is provided?</p> <p>Response:</p> <p>The Cumulative Effects Assessment (CEA) presented in Chapter 21 of the Environmental Statement [AS-032] considers the potential cumulative effects of noise (as well as other environmental impacts) from the Proposed Development with noise from other developments (including airports). A 'Zone of influence' (ZOI) within which potentially significant cumulative effects could occur is defined for each environmental topic (see Table 21.9 of Chapter 21 [AS-032]). The ZOI for the noise cumulative assessment is defined based on the noise study area, which as noted in Section 3 of Chapter 16 [REP1-003], incorporates the largest of the air noise LOAEL and is shown on Figure 21.1 [APP-164].</p> <p>The potential for cumulative effects from other airports was carried out following the methodology described in Section 21.3 of Chapter 21 [AS-032] and included Heathrow, Gatwick, Stansted and London City airports as the proposals at these airports met selection criteria and were raised during consultation, as evidenced by their inclusion on the Long List provided in Appendix 21.1 [APP-140]. The table in Appendix 21.1 reports the findings of the screening exercise and concludes that only Heathrow meets the criteria through spatial overlap of the wider waste and economics ZOI of the Proposed Development and the total ZOI of the Heathrow Expansion only, and is therefore considered on the Short List [APP-141] of other development to be considered in the CEA. The other airports were screened out as they are unlikely to result in significant cumulative effects, including from noise. Table 21.10 [AS-032] reports the finding of the CEA for the Proposed Development and those other developments on the Short List [APP-141]. Following the methodology only waste (page 87) and economics (page 52) needed to consider cumulative effects with Heathrow as the only potential overlap of ZOIs and no significant cumulative effects are reported, no other environmental aspects including noise need to consider this further in the CEA however noise has clarified this on page 85 of [AS-032]. The assessment therefore concludes that there are no significant cumulative effects from other airports.</p>
NO.1.18	<p>Question to the Applicant:</p> <p>Cumulative impacts</p>

PINS ID	Question / Response
	<p>The Applicant's post hearing submission for ISH3 [REP3-050] states that it is technically possible but not appropriate to add dB levels from different noise sources together as this would not account for the difference in how noise levels are experienced for example 'aircraft noise which is intermittent'. Given that the assessment of aircraft noise is based on the LAeq,16hour because it is correlated with annoyance and that consideration of traffic noise is based on the LA10,18hour metric (converted to a LAeq,16hour value), also correlated with annoyance, provide further justification for not combining LAeq noise levels at receptors close to the airport. In the absence of a relevant combined noise standard, explain why the ES significance criteria could not be used as a comparator.</p> <p>Response:</p> <p>Whilst multiple noise metrics and noise sources can be correlated with annoyance, research shows that the human response to different noise sources is different (both in terms of absolute noise level and noise change). The World Health Organization, for example, note that "As the main body of evidence on environmental noise still focuses on source-specific impacts of noise on health outcomes and does not incorporate combined exposure effects of multiple noise sources or other pollutants, however, the current guidelines provide recommendations for each source of noise specifically. No attempt has been made to combine noise from multiple sources for any particular health outcome." (Ref 10)</p> <p>This is why it is standard practice to use different assessment criteria for different noise sources (for example see Tables 16.13, 16.14, 16.16 and 16.17 of Chapter 16 of the Environmental Statement [REP2-032] which shows different assessment thresholds and change criteria for aircraft noise and road traffic noise. The research used by the Government in setting the LOAEL assessment threshold for aircraft noise (Ref 11) is specific to aircraft noise and cannot be applied to road traffic noise. UK specific legislation (Ref 12) and methodologies for monetising the health effects of noise (WebTAG) require that noise sources are modelled, mapped and assessed separately.</p> <p>For the reasons set out above the significance criteria defined in Chapter 16 of the Environmental Statement [REP2-032] are specific to the noise source in question and cannot be applied to combined noise sources.</p>
NO.1.19	<p>Question to the Applicant:</p> <p>The Noise Insulation Regulations 1975 Can the Applicant explain how the provisions of The Noise Insulation Regulations 1975 apply to the Proposed Development and whether this places any additional obligations on the Applicant to those assessed in the ES.</p> <p>Response: Under the Noise Insulation Regulations 1975 (Ref 13) the Applicant has a duty to carry out insulation work or to offer grants for the work at eligible properties if the qualifying criteria are met when either a new highway or an additional carriageway (located completely outside the extents of any existing highway) is to be constructed. With respect to the Proposed Development, this applies only to the Airport Access Road (AAR), and the Applicant would be required to complete a Noise Insulation Regulations assessment within 6 months of opening of the AAR using the as built scheme design. However, modelling used to inform Chapter 16 of the Environmental Statement [REP1-003] indicates that no residential properties are likely to meet all four of the qualifying criteria for noise insulation under the Regulations.</p>
NO.1.20	<p>[The Applicant notes that this question is directed to Luton Borough Council, however the Applicant considers that a response from the Applicant will help provide further clarification]</p> <p>Question:</p> <p>Luton Borough Council Environmental Protection - planning and noise guidance Explain the status of the Luton planning and noise guidance and the extent to which the Proposed Development should be subject to achieving the 55 dBLAeq (1hr) criteria for outdoor amenity.</p> <p>Response:</p> <p>The Applicant provided commentary on the 55dBLAeq,1h criteria in Applicant's Post Hearing Submission - Issue Specific Hearing 3 (ISH3) [REP3-050] in paragraph 6.5.1 to 6.5.3.</p>
NO.1.21(a)	<p>Question to the Applicant:</p>

PINS ID	Question / Response
	<p>In response to Action Point 2 for ISH3 [REP3-050, Table.1.1], the Applicant stated that the ES had assessed a reasonable worst-case assumption that excavated material would be moved by traditional trucks /dump trucks. For the avoidance of doubt, provide information to confirm that a static conveyor system would be quieter than traditional trucks/ dump trucks.</p> <p>Response:</p> <p>Standard data sources can be used to confirm that a static conveyor system would be quieter than traditional trucks/ dump trucks. For example, the Thames Tideway Development Consent Order Environmental Statement (Ref 14) provides Sound Power Levels of 104dB for a conveyor belt drive unit and 90dB for the conveyor based on British Standard 5228 (Ref 15) and measurement data. These sound power levels are lower than those for HGVs (108dB) and dumpers (109dB) used in the calculation of noise from haul routes from Table 5.3 of Appendix 16.1 of the Environmental Statement [AS-096].</p>
NO.1.21(b)	<p>Question to the Applicant:</p> <p>In response to Action Point 14 for ISH3 [REP3-050, Table 1.1], the Applicant referenced the Transport Assessment Appendix F but did not provide actual widths. For the avoidance of doubt, state the carriageway width assumptions used to model traffic noise on Vauxhall Way.</p> <p>Response: In modelling traffic noise, the drawings in Appendix F of the Transport Assessment [APP-201] were incorporated into the noise modelling software and scaled appropriately using existing mapping as a reference. For Vauxhall Way, once it has been widened to a dual carriageway, this process resulted in carriageway widths of approximately 7 metres. However, this value varies along the length of the road with carriageways being slightly wider north of Crawley Green Road, slightly narrower south of Eaton Green Road and widening further close to junctions.</p>
NO.1.22	<p>Question to the Applicant:</p> <p>Airline orders</p> <p>In response to Action Point 21 for ISH3 [REP3-050, Table 1.1], the Applicant provided three figures extracted from airline presentations. No explanation is provided as to which aircraft would be based at Luton or how the information provided has informed the development of the future fleet forecasts. The ExA requests that the Applicant provide a detailed explanation of how this information has informed the future forecast and confirmation from the airlines that the future fleet forecasts are representative of the proposed airline operations.</p> <p>Response: The Applicant cannot be certain of the rate at which key airlines will base their new aircraft at London Luton Airport. However, all three of the largest airlines are already operating new aircraft at the airport and expected to continue to deploy more of their fleet to Luton.</p> <p>In the case of Wizz Air, the airline has already confirmed that the base at Luton will be 100% new generation by 2025 (see Appendix B) and, since the airline will be at nearly 100% new generation by 2027 (as per the information provided in REP3-050, Figure 1), the Applicant has a high degree of confidence that this major operator will be all new generation in the near future at Luton when accounting for some inbound services from other bases in addition to the based operations.</p> <p>Following the submission of REP3-050, easyJet has also announced a further order for 157 new generation aircraft on top of those already ordered, and options to place another 100 on firm order above this (see Appendix C).</p> <p>Ultimately, airlines will continue to replace their older aircraft because there is an economic imperative to do so in order to reduce their own operating costs and meet sustainability targets, as older aircraft burn more fuel and become increasingly expensive to maintain. Therefore, not updating fleets makes airlines uncompetitive, particularly in the low fares airline sector that makes up the vast majority of operations at the airport. Low fares airlines will typically replace older aircraft at an earlier stage than other airlines due to the importance placed on keeping costs down within the business and this can be seen historically as airlines, such as Ryanair and easyJet, are already on their second generation of</p>

PINS ID	Question / Response
	<p>aircraft and now introducing their third generation each (having retired all their first generation aircraft some years ago). This pattern can be seen in the large numbers of new generation aircraft on order by low fares airlines in Europe and globally.</p> <p>The Applicant's approach to future fleet forecasts has, therefore, been based on specific known factors (such as Wizz Air's 100% new generation fleet by 2027) as well as expectations of how other aircraft on order by the airlines may be deployed, which have been considered taking into account factors such as the typical retirement timescales of airlines (10-20 years for most low fares airlines) and general industry trends, orders and announcements. The fleet mixes adopted for assessment were presented to the Noise Envelope Design Group, which included airline representatives and, in specific consultations with the airlines, the information has been shared with them. This has given the Applicant confidence that the overall rate of fleet replacement assumed in the forecasts is robust.</p> <p>The rate of fleet transition in the early years is broadly consistent with those presented at the Bristol Airport Inquiry (69% new generation by 2030) and accepted as reasonable by the Planning Inspectorate in that case as being "<i>generally sound</i>" (Appeal Decision APP/D0121/W/20/3259234, Page 37, Para 224).</p> <p>The Applicant believes that the fleet mix presented is reasonable and notes that there has been no substantive challenge to this from any other parties. Ultimately, if the rate of deployment of new generation aircraft is slower than projected at London Luton Airport then the airport will not be able to grow by virtue of the Limits being put in place through Green Controlled Growth (GCG). In order to take advantage of the scope to grow, the airlines will have a motivation to deploy newer types at the airport in order to meet the stringent limits which are being proposed. The principles that growth would be controlled by environmental limits if the fleet mix was not in line with forecasts was confirmed by the Planning Inspectorate at the Bristol Airport Inquiry (Appeal Decision APP/D0121/W/20/3259234, Page 49, Para 288).</p>
NO.1.23	<p>Question to the Applicant:</p> <p>Historical flight paths In response to Action Point 29 for ISH3 [REP3-050, Table 1.1], the Applicant provided flightpath maps for the period 2017-2023. Confirm whether averaged data for each of the main flight corridors (ie Olney, Compton and Detling) for the 3rd quarter can be provided on a single plan to enable comparison of the flightpaths and whether this data can be provided back to 2013. Section 1 of the document also contains a number of reference errors. Please provide any updated information with cross references corrected.</p> <p>Response:</p> <p>Issue Specific Hearing 3 Action 29 Response Paper - Historical Flight Path Information [REP3-075] has been updated at Deadline 4 to correct the reference errors and to provide the requested additional information. Whilst the radar track system cannot generate 'averaged data', it can generate plot density diagrams which can be used to indicate the average track where the plot density is at its highest. This information has been provided for the departure flight corridors for the third quarter back to 2013.</p>
NO.1.24	<p>Question to the Applicant:</p> <p>Compensation and Community First Fund - Eligibility It is noted that paragraph 5.245 of the ANPS references use of single mode easterly and westerly contours to inform eligibility for the Heathrow noise insulation scheme. Explain why average contours have been adopted for the Proposed Development and whether use of single mode contours would provide greater certainty that the Proposed Development would avoid significant adverse impacts on health and quality of life from noise for affected receptors.</p> <p>Response:</p> <p>Paragraph 5.245 of the ANPS is specific to Heathrow Airport and its proposals put forward to the Airports Commission in the context of the benefits brought about from the third runway expansion. The extension of the noise insulation scheme to include single mode contours was a voluntary commitment and not in response to policy requirements (the ANPS itself does not specify that it is a policy requirement) nor was it introduced to avoid significant adverse impacts on health and quality of life. Heathrow's assessment methodology for identifying significant adverse effects was defined in Heathrow's Preliminary Environmental Information Report (PEIR Graphic 17.9, Ref 16) and was based on the 'primary factors' of 92-day summer average $L_{Aeq,16h}$ and $L_{Aeq,8h}$ contour in line with the assessment methodology for the Proposed Development. Single mode contours are only referenced in the Heathrow methodology as one of several "<i>Additional factors: (that would reduce significant effects identified based on primary factors alone)</i>". In other words, significant adverse effects were not identified based on single mode contours.</p>

PINS ID	Question / Response
	<p>Standard practice and Government noise policy (Ref 3 and Ref 17) is that noise insulation eligibility should be based on 92-day summer average L_{Aeq} contours. The assessment criteria for the Proposed Development, in line with Government noise policy, also uses 92-day summer average L_{Aeq} contours. Single mode contours therefore has no bearing on the identification of, or avoidance of, significant adverse impacts on health and quality of life from noise with the Proposed Development.</p>
NO.1.25	<p>Question to the Applicant:</p> <p>Compensation and Community First Fund – Health and vulnerability of tenants The UK Health Security Agency (UKHSA) [RR-1546] suggests that tenants may have poor health or be considered vulnerable. The Applicant suggests that proactive measures would be taken to encourage take up of noise insulation by tenants. Explain what these proactive measures would be and how they are secured in the draft DCO or noise compensation scheme.</p> <p>Response:</p> <p>The Applicant has included a description of the proactive measures it would take at paragraphs 6.1.25 and 6.1.26 of the updated Draft Compensation Policies Measures and Community First [TR020001/APP/7.10] submitted at Deadline 4. As stated in paragraph 1.1.7 of the document, it would be secured via a section 106 agreement entered into by the Applicant.</p> <p>As part of the updated document submitted at Deadline 4, the Applicant has developed the wording of the current Draft Compensation Policies Measures and Community First [TR020001/APP/7.10] document in response to issues such as this one raised by the UKHSA in its Relevant Representation [RR-1546]. Commitments to maximise the take up of noise insulation by tenants is expressly set out in paragraph 6.1.49 the updated version of Draft Compensation Policies Measures and Community First [TR020001/APP/7.10] submitted at Deadline 4.</p>
NO.1.26	<p>Question to the Applicant:</p> <p>Compensation and Community First Fund – Notice period [REP2-005, paragraph 7.1.2] states that a 14-day temporary possession notice would be served on affected businesses. Provide justification for this notice period.</p> <p>Response:</p> <p>Paragraph 7.1.2 of REP2-005 states: <i>The statutory position is, once the Applicant has consent, it may serve a notice of either 14 days for temporary possession or three months for permanent acquisition to require the owner or occupier to vacate with compensation being assessed afterwards based on the submission of a claim.</i> This is provided in the section of the policy which is intended would deal with business support and para 7.1.4 goes on to state that: <i>Depending on the specific circumstances of the individual business in question, the Applicant will consider a range of potential support measures. The Applicant's proposals are designed to provide flexibility and greater certainty for future business planning and go beyond statutory requirements.</i> One of the offers being to agree an arrangement for an extended notice period to be given before the property is acquired.</p> <p>It should be noted that in a significant number of cases, the land identified for temporary possession will be existing public highways, verges or bare land not occupied by a business. However, the updated version of the Draft DCO submitted at Deadline 4 proposes an amended period of 28 days. The Applicant believes the longer 28-day notice period will be sufficient so as to provide flexibility and not to cause unnecessary delay to the commencement of works on site. When business occupiers would be directly impacted, the business support policy will be engaged to help provide flexibility that may be required to mitigate the potential impact. This will be in the interests of the Applicant because it will minimise the compensation otherwise due to the affected parties for disturbance caused.</p>
NO.1.27	<p>Question to the Applicant:</p> <p>Compensation and Community First Fund – Unspent funds</p>

PINS ID	Question / Response
	<p>[REP2-005, Section 8] describes the Community First fund. The Applicant confirmed in [REP2-035, paragraph 8.39] that unspent funds in a financial year would be rolled over to subsequent financial years, provide a revised compensation document that confirms this position and indicate how this would be secured in the draft DCO.</p> <p>Response:</p> <p>The Draft Compensation Policies Measures and Community First [TR020001/APP/7.10] document has been updated to confirm this at paragraph 8.1.10, and has been submitted at Deadline 4.</p>
NO.1.28	<p>Question to the Applicant:</p> <p>Compensation and Community First Fund - Grant application [REP2-005, Section 10] describes the administration of the Community First fund by an awards panel. Confirm how many grant applications the board would be able to process each year and why a £25,000 cap has been set for grants.</p> <p>Response:</p> <p>As set out at 10.1.1 and 10.1.2 of the Draft Compensation Policies Measures and Community First document [TR020001/APP/7.10], Community First would be managed by an independent charitable body which would establish awards panels to consider grant applications.</p> <p>The Applicant notes the concerns raised by some Interested Parties about the potential volume of applications which could be forthcoming with a grant limit of £25,000 as the fund reaches an annual budget of £13m.</p> <p>A cap of £25,000 has been set for the first period of Community First based on the likely fund size during the first five year period, which is not expected to exceed £2.5m. A fund of £2.5m could be allocated across 100 grants at £25,000. The Applicant notes that, based on its core passenger forecasts, as set out in the Need Case [AS-125], the fund would not be expected to reach more than £2.5m per year until 2037. Consequently, the administration of the fund would have until then to plan for future growth. It should also be noted that the review mechanism built into Community First allows for the grant size to be adjusted, meaning as the fund grows, so could the maximum grant size, presenting the opportunity for larger grants in the future.</p> <p>A significant proportion of the Applicant's existing community funding programme is currently managed in this way by the Bedfordshire & Luton Community Foundation (BLCF) and their views have been sought on how the fund might be managed and their capacity to deal with high numbers of grant applications. A note from BLCF in this regard is included at Appendix D to this document.</p>
NO.1.29	<p>Question to the Applicant:</p> <p>Compensation and Community First Fund – Parked mobile homes Drawing on information from your current insulation provider, confirm whether parked mobile homes, such as those present near Pepperstock and Woodside Park, are capable of being insulated to a level that would ensure that effects above the Significant Observed Adverse Effect Level would be avoided.</p> <p>Response:</p> <p>The park homes near Pepperstock (Brickhill Park) and in Woodside Park are not exposed to noise levels above the SOAEL so there is no requirement to ensure that effects above the SOAEL are avoided for these properties. The Applicant is not aware of any parked mobile home sites within the SOAEL contour.</p> <p>Although no significant effects are identified for Brickhill Park and Woodside Park, they may be eligible for noise insulation under Scheme 4 or 5 based on the indicative eligibility contours provided in Appendix A of Draft Compensation Policies and Community First document [TR020001/APP/7.10]. The Applicant's understanding of the park homes in Pepperstock and Woodside Park is that they are substantial permanent structures rather than parked mobile homes and would be capable of being insulated. As with all properties, upon meeting the eligibility criteria a survey will be carried out to determine the scope of works required taking into account specifics of the property in question.</p>

PINS ID	Question / Response
NO.1.30	<p>Question to the Applicant:</p> <p>Compensation and Community First Fund – Appeal Confirm whether there is any right of appeal mechanism for decisions made by the Applicant, or its supplier, relating to noise insulation. If not, why not and, if there is, signpost where this is detailed and explain how it would be secured?</p> <p>Response:</p> <p>To achieve fairness the policy incorporates independent monitoring through the engagement of a sub-committee of the London Luton Airport Consultative Committee (LLACC). The LLACC has no executive role in the decision-making process of the airport. The aim of the LLACC is to ensure that as wide a range of views as possible is made available to the London Luton Airport management team so that they can take account of the issues which are of concern to those using the airport, working at it or living around it. The chairman of the Committee is appointed by London Luton Airport Operations Limited (LLAOL), the airport operator, but is independent of the airport and the other bodies on the LLACC. The proactive approach that would be adopted to the roll out of the policy will result in a constantly developing dialogue with homeowners and occupiers that will help to put in place changes to overcome challenges and issues arising from implementation of the policy. Roll out in these high volumes will need to remain straightforward and process driven. The Applicant believes that any formal appeal mechanism would slow this down and hinder delivery. The section 106 obligation for the Applicant to make available and secure maximum take up of the noise insulation offer will drive the right behaviours to overcome genuine disputes. Common problems will be grouped and addressed with solutions identified in engagement with the local authorities and the LLACC sub-committee. When the Applicant procures the contracts to deliver the Noise Insulation Scheme it will include a requirement for the contractor to manage and operate a complaints procedure for those who accept the invitation to participate and are dissatisfied with their experience of the process. The Applicant will use information from the complaints procedure to monitor the performance of the contractors.</p>

REFERENCES

- Ref 1 London Luton Airport (2012), London's Local Airport Planning Application Environmental Statement Chapter 13 Traffic and Transport.
- Ref 2 International Standards Organisation (1996), ISO 9613-2 Acoustics – Attenuation of sound during propagation outdoors: Part 2: General method of calculation.
- Ref 3 Her Majesty's Stationery Office (2013), The Aviation Policy Framework.
- Ref 4 Department for Transport (2023), Policy Paper: Overarching Aviation Noise Policy
- Ref 5 Department for Transport (2018). Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England.
- Ref 6 Civil Aviation Authority (2019, CAP1766 Emerging Aircraft Technologies and their potential noise impacts
- Ref 7 Department for Transport (2018), Aviation 2050 – the future of UK aviation.
- Ref 8 Aviation Strategy: Noise Forecast and Analyses
- Ref 9 ICAO (2014), Report by the Second CAEP Noise Technology Independent Expert Panel, ICAO Doc. 10017, ISBN 978-92-9249-401-8, ICAO, 2014.
- Ref 10 World Health Organisation (2018), Environmental Noise Guidelines for the European Region.
- Ref 11 Civil Aviation Authority (2021), CAP1506: Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition
- Ref 12 Her Majesty's Stationery Office (2006), The Environmental Noise (England) Regulations.
- Ref 13 Her Majesty's Stationery Office (1975), Noise Insulation Regulations.
- Ref 14 Thames Water (2014), Thames Tideway Environmental Statement Volume 14: Kirtling Street Appendices (application reference WWO10001)
- Ref 15 British Standards Institute (2014), BS 5228-1:2009+A1:2014 – Code of practice for noise and vibration control on construction and open sites. Part 1: Noise. BSi, London.
- Ref 16 Heathrow (2019), Preliminary Environmental Information Report, Volume 1, Chapter 17: Noise and vibration
- Ref 17 Department for Transport (2017), Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace.

Appendix A - 1.16 Conversion Between Integrated Noise Model and AEDT Model

Contents

	Page
1 Introduction	1
2 Comparison between INM and AEDT	1
3 Comparison of 2019 and 2022 Departure Profiles	1
4 Summary	2
Glossary and Abbreviations	6

1 INTRODUCTION

1.1.1 This document provides a response to the Examining Authority's Written Question NO.1.16 **[PD-010]**:

“Conversion between Integrated Noise Model (INM) and AEDT model

ES Appendix 16.1 [AS-096, section 6.16] explains that INM contour area limits show a relatively good fit with AEDT contour area limits, although there is some difference for 25 departure routes. This is assumed to be acceptable on the basis that 2019 radar data shows good correlation between departure profiles on both runways. Is radar data available for other years to support this assumption?”

1.1.2 The response clarifies how a conversion factor between the Integrated Noise Model (INM) and the Aviation Environmental Design Tool (AEDT) has been determined, how it has been applied and provides a comparison of 2019 and 2022 departure profiles to show that there is a good correlation between 07 and 25 departure profiles from another year.

2 COMPARISON BETWEEN INM AND AEDT

2.1.1 Section 6.16 and 6.17 of **Appendix 16.1** of the **Environmental Statement [AS-096]** provides a comparison between the 2019 Actuals baseline modelled in INM and AEDT. The differences in contour areas were used to derive a conversion factor between INM and AEDT in order to derive a 2019 Consented baseline. This was necessary because the current consented noise contour area limits are defined in INM, but the assessments in **Chapter 16** of the **Environmental Statement [REP1-003]** are undertaken using AEDT. It is important to note that this conversion factor has been derived using 2019 contours, and applied to 2019 contours, so the conversion is not affected by any differences in radar data in other years. The conversion factor has not been applied for any other purpose within the noise assessment.

3 COMPARISON OF 2019 AND 2022 DEPARTURE PROFILES

3.1.1 To provide an indication of the correlation between departures on 07 and 25 runways, analysis of 2022 departure profiles has been undertaken as requested and this is presented in Inset 4-1. This analysis shows that, for all aircraft operating in 2022, the departure profiles are reasonably consistent regardless of whether departing on the 07 or 25 runway¹.

3.1.2 A comparison between 2019 and 2022 departure profiles has also been made to determine if 2022 departure profiles are consistent with departure profiles in 2019. Departure profiles for easyJet and Wizz Air Airbus aircraft are provided in Inset 4-2 and departure profiles for Ryanair Boeing aircraft are provided in Inset 4-3.

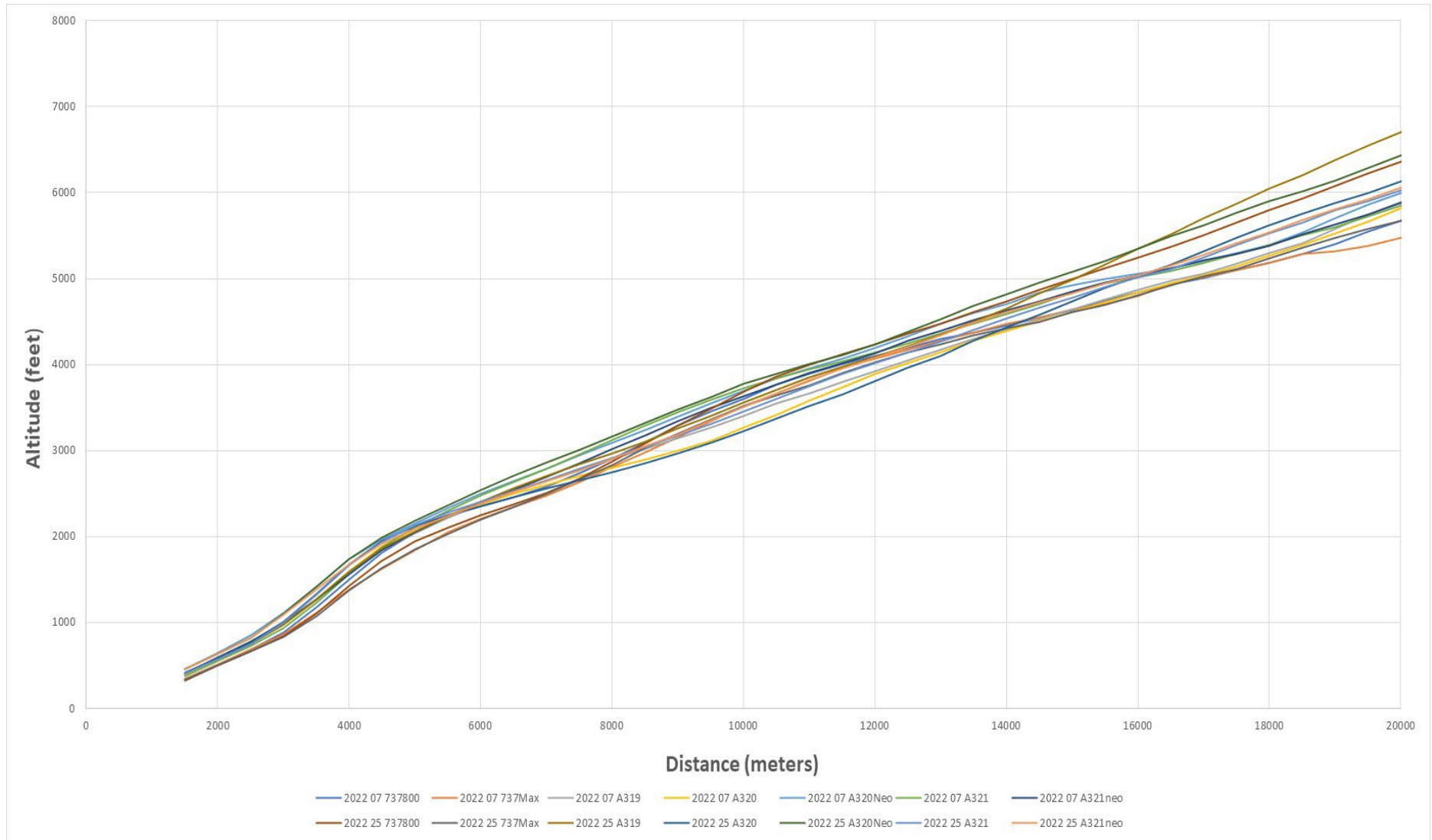
¹ The 07 and 25 runways are the same physical runway with different names based on the direction in which the runway is being operated

- 3.1.3 Departure profiles in Inset 4-2 show that Airbus aircraft are flown consistently; however, Boeing aircraft were flown differently in 2019 than in 2022. In 2019, Ryanair departures ascended to 4,000 feet before continuing on reduced thrust and reducing the rate of ascent. Departure profile data for 2022 indicates this procedure has changed with Ryanair ascending to 2,000 feet before reducing thrust. This would mean that Ryanair aircraft are quieter when they are ascending from 2,000 feet to 4,000 feet due to the reduced thrust setting. When the 2019 profile aircraft reach 4,000 feet, they are approximately 800 feet higher than the 2022 profile; however, the 2019 and 2022 profiles broadly converge by the time they reach 5,000 feet (see Inset 4-3).
- 3.1.4 As described in Section 2, this change has no bearing on the conversion between INM and AEDT which was derived using 2019 contour areas and has only been applied to 2019 contour areas.
- 3.1.5 It is not unexpected that aircraft profiles may change over time. Such changes do not affect the conclusions of the noise assessment in **Chapter 16 of the Environmental Statement [REP1-003]** as they would apply to both the Do-Minimum and the Do-Something scenario.
- 3.1.6 Changes to aircraft profiles would be taken into account in the annual update of the noise model validation secured in the **Aircraft Noise Monitoring Plan [REP3-023]**.

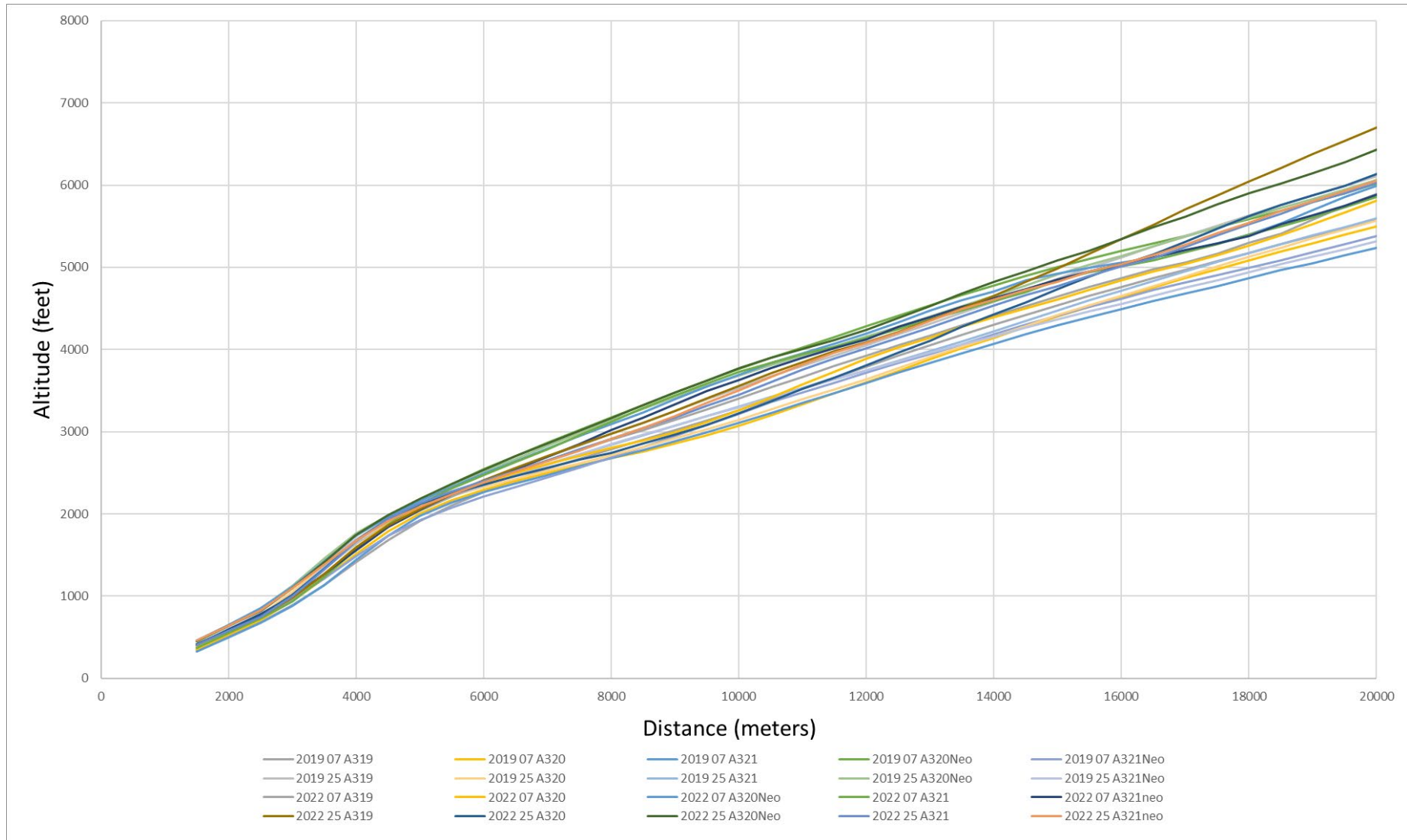
4 SUMMARY

- 4.1.1 Radar data has been analysed to provide altitude departure profiles for 2019 and 2022. The analysis shows that there is good correlation between departure operations on runway 07 and runway 25.
- 4.1.2 Analysed altitude departure profiles for 2019 and 2022 show consistency across the years, with the exception of Ryanair Boeing aircraft, which show differences in departure profiles above 2,000ft.
- 4.1.3 Any differences in departure profiles across the years do not affect the conversion between INM and AEDT which was derived using 2019 contour areas and has only been applied to 2019 contour areas.
- 4.1.4 Changes to aircraft profiles would be taken into account in the annual update of the noise model validation secured in the **Aircraft Noise Monitoring Plan [REP3-023]**.

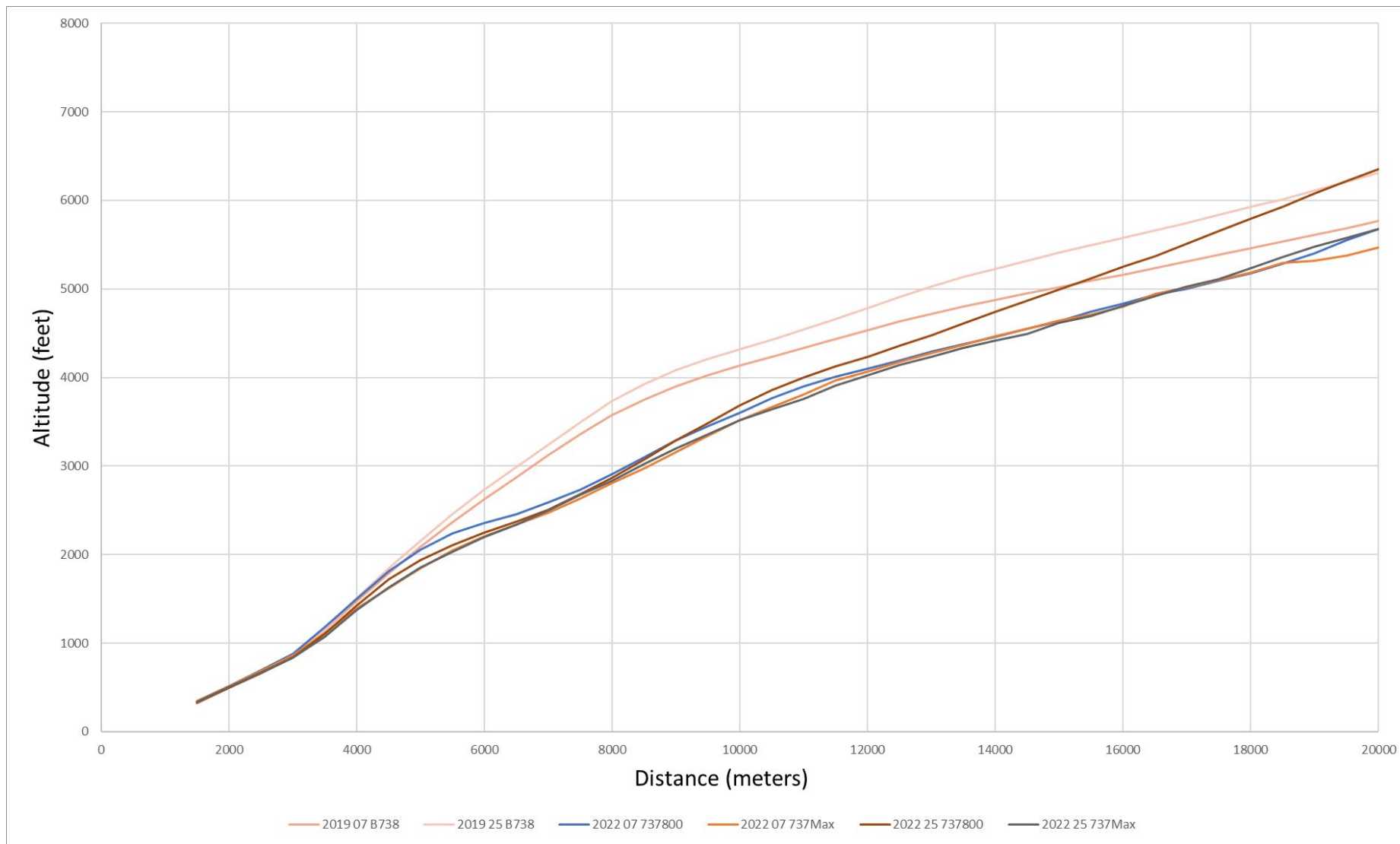
Inset 4-1: 2022 Departure Profiles



Inset 4-2: 2019 and 2022 easyJet and Wizz Air Departure Profiles



Inset 4-3: 2019 and 2022 Ryanair Departure Profiles



GLOSSARY AND ABBREVIATIONS

Term	Definition
AEDT	Aviation Environmental Design Tool
INM	Integrated Noise Model

Appendix B - Wizz Air Press Release

Information & Services

[Booking information](#)
[Flight status](#)
[Travel information](#)
[Prices & discounts](#)
[Memberships](#)
[Wizz services](#)
[Partner services Terms & Conditions](#)

About us

[About WIZZ](#)
[Company Information](#)

News

[Press Office](#)
[Sustainability](#)
[Fly The Greenest](#)
[WIZZ Running](#)
[General Conditions of Carriage](#)
[Cookie Policy](#)
[Privacy notice](#)
[Data Subject Rights](#)
[Investor relations](#)
[Contact](#)
[FAQ](#)

News

WIZZ AIR TO SWITCH ALL LUTON-BASED AIRCRAFT TO AIRBUS A321NEO BY 2025

Jun 13, 2023, 10:00

Wizz Air, Europe's fastest-growing and most environmentally sustainable airline globally*, will make its entire aircraft fleet at London Luton Airport (LLA) Airbus A321neo by 2025.

Wizz Air has 11 aircraft stationed at its base in London Luton Airport with an average age of 3 years. The share of the new 'neo' technology in the airline's fleet at LLA has already surpassed 50% and will reach 100% by 2025.



The Airbus A321neo has 239 seats in a single-class configuration. The aircraft incorporates the latest technologies in aviation. The new technology offers a nearly 50% reduction in noise footprint, a 20% reduction in fuel consumption and 50% reduction in nitrogen oxide emissions compared to the previous generation aircraft**. The Airbus A321neo can currently fly with up to 50% sustainable aviation fuel (SAF) blend***.

of its fleet renewal programme, which ensures Wizz Air has the latest technology, the older aircraft decommissioned from LLA will re-join Wizz Air's global fleet until 2027, after which it be replaced by new Airbus A321neo aircraft. In addition to its ambitious fleet renewal programme, Wizz Air is constantly working on fuel efficiency initiatives and improving the related data analytics.

Wizz Air has also established its sustainable aviation fuel (SAF) strategy, which includes securing offtake agreements with suppliers for the future, and has already partnered with Neste, OMV and Cepsa. In April 2023, Wizz Air announced its first equity investment in a biofuel company, Firefly Green Fuels, to further support SAF development in the UK. In May 2023, the airline, as part of Indigo Partners, invested in the US-based SAF start-up Clean Joule.

To plan for the longer-term, the airline works with Airbus to explore the potential for hydrogen-powered aircraft. These partnerships reinforce Wizz Air's commitment to driving emissions intensity down by the end of the decade.

Yvonne Moynihan, Corporate and ESG Officer at Wizz Air: *"London is an important market for Wizz Air and remains in our focus for continuous investment. We are already leading in sustainability, operating the youngest fleet**** in Europe in the most efficient way. We are focused on technology and innovation and feel confident that fleet renewal is a key solution available here and now to reduce emissions from aviation. Replacing older aircraft at our London Luton Airport base with the newest and more fuel-efficient Airbus A321neo is part of our long-term fleet renewal strategy to reduce carbon intensity by 25% by 2030. We are delighted to work together with London Luton Airport on finding new solutions that help us to reach our targets."*

LLA is committed to sustainable aviation and has set an ambition to achieve net zero by 2040 for its airport emissions. Its commitments include generating 25% of electricity from on-site renewable sources by the end of 2026, using 100% low carbon vehicles by 2030 and transitioning to low carbon heat from 2030. In addition, LLA is continuing to work closely with its partners to support and enable the reduction of overall carbon emissions across the airport.

Jonathan Rayner, Chief Commercial Officer at London Luton Airport, added: *"We are delighted to have secured this agreement with Wizz Air that adds to the growing number of quieter and more fuel-efficient aircraft that are now based at London Luton Airport. Alongside our own commitment to sustainable aviation, and our ambition to achieve Net Zero by 2040 for our airport emissions, Wizz Air's investment in these next generation aircraft is an example of the way in which we are working with airlines to enable the reduction of overall carbon emissions across our airport. Preparations are well under way for the busy summer ahead and our teams are focused, as ever, on delivering a simple and friendly passenger experience."*

*According to CAPA - Centre for Aviation Awards for Excellence 2022

**Based on the comparison between Airbus A320neo and Airbus A320ceo aircraft families.

***SAF must be blended with conventional jet fuel to meet regulatory requirements for use within the aircraft.

****Based on the latest publicly disclosed emission information applicable to a 12-month period (Ryanair, EasyJet). Due to differences in reporting period, the figures and

*****Based on the latest publicly disclosed fleet age information applicable to a 12-month period (Ryanair, EasyJet, Iberia, Norwegian, SAS, Air France – KLM, Lufthansa, Finnair). Due to differences in reporting period, the figures and timeframe are not fully aligned.

[BACK](#)

Wizz Air Hungary Ltd. All rights reserved. © 2004–2023 Wizz Air © 2000–2023 Navitaire

[Privacy Notice](#) | [Cookie Policy](#) | [Wizz Air Modern Slavery Statement](#) | [Website Terms of Use](#) | [Agency Registration](#)
[Agency Login](#) | [Wizz Air Mobile App](#) | [Subscribe to our newsletter](#) | [Careers](#)

Appendix C - easyJet Announcement

Aerospace & Defense

UK's easyJet eyes ambitious growth with Airbus fleet deal

By Sarah Young

October 12, 2023 10:29 AM GMT+1 Updated 18 days ago



 REUTERS®



An easyJet Airbus A320neo aircraft is parked on the tarmac of Adolfo Suarez Madrid Barajas Airport, in Madrid, Spain, June 22 2022. REUTERS/Isabel Infantes/File photo [Acquire Licensing Rights](#)

Summary Companies

To buy up to 257 new aircraft

Sees FY profit at 440-460 mln stg

Targets 1 bln stg profit in medium term

Shares fall 3%

LONDON, Oct 12 (Reuters) - British airline easyJet ([EZJ.L](#)) said it would buy up to 257 Airbus jets as it plots its growth beyond 2028 while restoring its dividend and aiming to more than double profits.

Signalling its recovery from the pandemic was now in full flow, easyJet said the time was right to lay out a long-term growth plan based on bigger and more fuel-efficient planes.

EasyJet chief executive Johan Lundgren said the proposed deal with Airbus ([AIR.PA](#)), subject to shareholder approval, would add 157 aircraft plus the option for 100 more A321neo jets. The airline currently operates about 330 aircraft and will be retiring some older planes.

EasyJet's ambitions come despite heightened geopolitical instability following attacks by Palestinian militant group Hamas in Israel, which has led to [flight cancellations](#), and higher oil prices, plus worries over consumer sentiment in Europe.

Fleet expansion will enable the company to sell more seats on routes from congested European airports like London Gatwick and Amsterdam, where there are few slots available to add more flights.

Advertisement Scroll to continue

Lundgren said by 2034, easyJet's average number of seats per flight would rise to the low 200s from 179.

"The group's very much thinking future-first with a huge new order of aircraft on the table," Hargreaves Lansdown analyst Sophie Lund-Yates said, adding that more information was needed on how the planes would be financed.

Shares in easyJet, which competes with Europe's biggest airline Ryanair ([RYA.I](#)), British Airways ([ICAG.L](#)) and others, fell 3.8% in morning deals. They have lost 14% of their value over the last three months as the oil price has risen.

Advertisement Scroll to continue

EasyJet forecast annual profit of 440 million to 460 million pounds (\$542-\$567 million) for the 12 months to the end of September, and said it was targeting a pretax profit of more than 1 billion pounds in the medium term.

The airline made a loss of 178 million pounds last year, when pandemic restrictions were still in place for some of the time.

During COVID-19, it had suspended its dividend, but said this would restart with its full-year results in November.

Advertisement · Scroll to continue



Bigger planes, reduced winter losses and the growth of its holidays business would help the company meet its medium term profit goal, Lundgren said, shrugging off worries that the outlook had dimmed.

"We continue to see that the demand is strong going forward," he told reporters on Thursday.

EasyJet, which only flies Airbus planes, said the terms of the deal with Airbus were attractive, without giving details, and it gave the airline certainty at a time when manufacturer order books are filling up.

Advertisement · Scroll to continue


It already has a separate order for 163 planes due up to 2028.

The airline's founder Stelios Haji-Ioannou, who owns a 15% stake, has in the past questioned the need to buy expensive new aircraft.

(\$1 = 0.8111 pounds)

Reporting by Sarah Young, Editing by Paul Sandle and Elaine Hardcastle

Our Standards: [The Thomson Reuters Trust Principles.](#)

Acquire Licensing Rights 



Sarah Young
Thomson Reuters

Sarah reports on UK breaking news, with a focus on British companies. She has been a part of the UK bureau for 12 years covering everything from airlines to energy to the royals, politics and sport. She is a keen open water swimmer.



Feedback



Appendix D - BCLF Note



Outline of BLCF partnership approach to Community First.

Date 17th Oct 2023

The Draft Compensation Policies, Measures and Community First document outlines how the expansion of the airport will provide a mechanism and opportunity to grow its support for local communities and neighboring areas in need.

As previously shared, Bedfordshire and Luton Community Foundation (BLCF) have worked in partnership with LLAL (Luton Rising) for the last 15 years supporting delivery of their ambitious and needs driven Community Funding Programme. Over the last 4 years we have been contracted to support their CSR work and to ensure a significant amount of community funding is used to support charitable and community works across Luton and neighbouring communities, who are impacted the most by the airport's activity and those communities most in need or at risk. Since 2019 and the launch of the Community Investment Fund (CIF) programme in early 2020, we have managed and awarded £13,433,203 in Luton Rising funding. This has been through managing and accessing 392 applications, resulting in 296 grants being awarded and reaching 964,069 beneficiaries.

Community First aims to build on this success and learning and develop a stronger and more far-reaching programme of funding support. As outlined, the aim is to grow, the airport's passenger numbers to 32mppa and in turn create up to £13m additional funding for communities. This growth will of course take time to build, and this will allow the Community First programme to develop and shape in a sustainable way, adapting and responding to needs and learning as it develops to its target.

Current Luton Rising funding managed by BLCF sees c£3.5m awarded across 4 grant programmes which are Community Investment fund (CIF), Small Grants (SG), Luton Youth Fund (LYF) and Near Neighbours (NN). This amount of funding on average sees c 100 applications per year across these programmes, however BLCF regularly manages a grants programme across 16 funders, worth over £5m with c400 annual applications. Growth to £13m may not be realized until the 2040s but the level of grants managed would grow with the funding so for example the airport achieves £2.5m by 2027 then this could support 50 grants at £25k (50%) and 125 grants at £10k (50%) and consideration for increasing the upper grant limit could also be made. The capacity of BLCF would grow to support the levels of demand, and its expanded geography will see that impact and success seen to date reaches even more of the most in need communities of Bedfordshire and surrounding counties.

As experts in grants management BLCF bring these skills to the current partnership with Luton Rising and if appointed as their independent delivery body, would develop a layered approach to delivering Community First. We would recommend that the funds are structured in a way to support a range of need within the authorised Community First themes, assisting projects and VCSE groups to access the funds ensuring equity and reducing barriers to access that are experienced by many minoritised communities or those led by



Bedfordshire & Luton
Community Foundation

Enterprise House,
Wrest Park,
Silsoe,
Bedfordshire
MK45 4HS

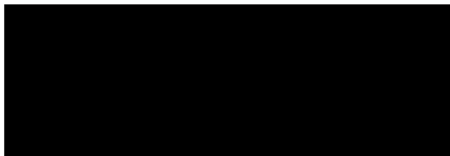


and supporting groups with protected characteristics according to the Disability Discrimination act 1995. This would be by,

1. **Creating entry level grant funds** (potentially less than £10k a year) to support pilot and testing projects and build smaller VCSE groups' own sustainability, and skills to secure and deliver funded projects.
2. **Move towards multiyear funding** (up to the stated £25k a year max) to ensure groups can deliver longer term impact and evidence of impact for the benefit of targeted communities.
3. **Create programmes to align with the Luton 2040 vision** strategic priorities and that's groups are supported to gather and report data that evidence this impact.

Through this approach we could see even more applications managed but across a range of programmes so that Community First becomes the umbrella for a range of new targeted funds with a clear strategic fit.

Managing a range of new programmes could be resourced through BLCF, if we are successfully appointed, and we would work with Luton Rising to grow and expand as the Community First funds became available to ensure its was managed and delivered successfully and always aligned to current and long term needs of the communities its reaches.



Karen Perkins

CEO, Bedfordshire & Luton Community Foundation

Karen.Perkins@blcf.org.uk