

<p>NO.1.11</p>	<p>Fleetmix – larger aircraft</p> <p>The ExA asked <i>“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 this would affect the conclusions of the ES”</i>.</p> <p>The Applicant has chosen only to answer the question very narrowly, by interpreting the word “modes” in an aviation-technical sense of “modal split” between east/west operations, thereby evading providing the requested information about operational differences of such aircraft due to runway length or flight profiles.</p> <p>To assist the ExA we note that there is no assessment of the operating noise or the operational constraints imposed on wide-bodied jets by the relatively short runway length of 2160m at Luton, compared to 3900m at Heathrow, 3000m at Stansted, and 3310m at Gatwick.</p> <p>Nor does any assessment take account of the need for noisier operating procedures on arrival. Wizz Air pilots have advised the London Luton Airport Consultative Committee Noise and Track Sub-Committee that higher flap settings are required when A321 aircraft approach Luton, to help slow the aircraft due to the relatively short runway length.</p> <p>We also note that the Luton runway length may not be adequate for safe departure of a fully laden (passengers, luggage and fuel) Airbus A321 and pilots may need to assign a weight limit depending on stage length (ie distance to destination), which has an effect on economics. Such issues are made worse by hot weather and less dense air.</p> <p>We further note that larger and heavier aircraft create more airframe noise on arrival, and more heavily laden aircraft tend to climb more slowly on departure (all else being equal) and therefore generate more ground noise, than lighter aircraft.</p> <p>Finally, we note that aircraft are officially certified for noise during tests involving various flight phases, and this information is publicly available, therefore could be provided to show the certified noise comparison between typical types operating at Luton currently, and those proposed for the long-haul flights in the future.</p> <p>The question asked is very pertinent to noise impacts for a number of reasons, and we urge the ExA to press the Applicant for a more complete, helpful and properly evidenced response.</p>
<p>NO.1.12</p>	<p>The question highlights disparities in the declared percentages of new generation aircraft between different responses provided in REP1-023.</p> <p>The answer is again unhelpful. REP1-023 advises RR-0289 <i>“In 2023, approximately 40% of the fleet are made up of new generation aircraft”</i> (PDF p66). The very next response, again to RR-0289 states <i>“By summer 2023, approximately 40% of the fleet</i></p>

	<p><i>is made up of new generation aircraft.”</i> But in response to RR-1416 it states <i>“This fleet transition has been observed in 2023 where, to date, approximately 31% of the fleet are made up of new generation aircraft.”</i> (PDF p266). Since that response is dated August, which does correspond to summer, there is a clear disparity.</p> <p>To assist the ExA, we note that the Quarterly Monitoring Report produced by the Airport Operator for Q2 2023 shows a total of just 26% new generation aircraft.</p> <p>Our own observations from the Airport’s online flight tracking system is that in August 2023 the proportion of new generation aircraft was around 30%. The Airport Operator is due to publish its Q3 2023 Quarterly Monitoring Report shortly and this will give an accurate impression, but the Applicant’s figures appear over-optimistic and we urge the ExA to press for more clearer and properly evidenced information.</p>
NO.1.13	<p>Estimates of the noisiness of future aircraft types clearly influence modelling and assessment in two ways. The Applicant chooses to describe only one viewpoint.</p> <p>If future aircraft are modelled to be less noisy than they turn out to be, there will be an understatement of future noise in the modelling. Applicants tend to describe such an approach as “robust and a reasonable worst-case” as the Noise Envelope limits are set to a more conservative value.</p> <p>There is a risk, however, that if the aircraft turn out to be noisier than expected, as indeed the A321neo has proved to be at Luton. By the time the issue was uncovered, the aircraft was already operating, and the airline had created schedules and sold tickets. The Airport Operator first claimed the aircraft were on a “noisy route”; then that it is a matter beyond their control and they are putting pressure on the aircraft manufacturers but are being ignored; then that they are accumulating data to send to the CAA for analysis and are too busy to release it to us (LADACAN requested it). Nothing has emerged for some 2 years and the issue drags on and is not resolved.</p> <p>It is worth noting that future designs involving open rotors are expected to be noisier than current designs.</p>
NO.1.15	<p>If the Applicant is modelling the noise impacts based on the default load factor of 65% then the modelling is likely to be inaccurate and under-represent the noise. The Luton Airport operator has quoted load factors of 80% or more.</p> <p>We urge the ExA to press for reliable data to be obtained from the Operator, and for it to be used in the noise modelling.</p>
NO.1.20	<p>News reports indicate a 10% reduction in capacity of the Wizz fleet due to engine issues with neo aircraft. This is a factor which the Applicant has not commented on.</p>