

Peter White-20038959-RR1199

Observations and questions on responses to my previous written questions.

Documents TR02001/APP/8.107 and APP/8.86

Document APP/8.107.

I.D 1

The applicant provides e a list of authorities, regional and national bodies who “confirmed their support for the principle of Green Controlled Growth (GCG)”.

The Applicant considers that the development of GCG has therefore undergone public scrutiny from various statutory and non-statutory bodies.

Question- where does the applicant show the responses to the concept of GCG from the general public who submitted the response forms from presentations?

Were the responses from the general public included in the decision process by the applicant, or were just those from the principle local authorities/national bodies considered?

On what basis was the decision made to exclude individual public responses?

I.D 2

The applicant states that it is social enterprise, owned by Luton Borough Council (LBC), for community benefit. In this capacity it has not had direct involvement in employment creation opportunities outside its core airport business.

Social Enterprise businesses can be simply defined as a business that ploughs its profits back into a strong social or environmental mission, i.e. trading to create benefits for people and the planet

Question- Based on the simple definition above, and the fact that at no time has the applicant even tried to influence employment outside the airport, how can the applicant claim that this application is crucial to its ability to grow employment opportunity within Luton, when it appears to have no interest in the employment economy of the town outside the airport?

I.D 3/4

The applicant's response to my question as to how it will claim back slots to meet environmental targets, has not been answered.

They refer to a theoretical set of agreements between the airport operator at the time of DCO approval, and the operating airlines, to reduce slots if environmental targets are to be breached.

As I stated in my question, there are no international or national regulations for the airport operator to actually do that.

I would now like to again refer the ExA to the airport operator's application for 19 million passengers per annum recently granted. Planning condition noise contours were showed to be at risk of breach due to the applicants self-funded airline growth incentive, and yet that incentive was not withdrawn to prevent and control those noise contour breaches.

Question- Based on the fact that the return of slots to control environmental breaches under GCG would still be at the bequest of the airport operator, and the operating airline, what cast iron guarantees, within current aviation rules, does the applicant give that slots will be cancelled if environmental targets are not met?

Will the applicant please inform me of what takes precedence under GCG, the airport/airlines commercial income, or the environmental protection of those affected by airport operations?

I.D 5/6/7

My request to the applicant was to provide details for last year, 2022, of the passenger loads for all flights that were scheduled for slots between 2300-0600, for each day of the week, split into summer/winter season?

The applicant has provided what appears to be the total number of seats scheduled in that period?

Question- Are these totals actual passengers carried on flights which were scheduled to operate in that period, not delayed flights from pre 2300, or the available seating capacity on flights scheduled during that period?

For the benefit of the ExA, I understand that my request for ticket price data is commercially sensitive for airlines, the point I was hoping to bring to the ExA's consideration was that does the passenger chose to fly back from Spain at 0230 in the morning because of personal choice, or the cheaper cost of the ticket price?

I.D 8

I thank the applicant for the provision of the details of airport fees and charges, but as it is well known that at all airports such charges are simply a starting point for discussions with airlines as to what they actually pay, the previously mentioned airport growth scheme by the applicant makes this point, the reply was not sufficient.

The reason for my question was to inform the ExA, that executive jet operators will pay a premium to be able to operate to their owners/charterers schedule. These jets constitute a considerable number of the noise threshold/track violations at Luton Airport. I wished to try and bring the point that commercial income for the flights is deemed more acceptable than the protection of those affected by them during the night period.

I.D 9

In response to my question as to whether the passenger capacity of flights scheduled to operate a return flight during the night period, could not be accommodated on flights earlier in the day, the applicant gave this response:-

This pattern of operations is essential to the airlines achieving efficient use of their aircraft and is fundamental to their ability to deliver low air fares to the benefit of consumers.

Question- The applicant describes GCG as a ground breaking declaration to put the environmental impacts of the airport on the surrounding population at the forefront of its expansion plans.

It states that flight growth will be rigorously controlled to achieve that aim.

Yet, in the reply above, it clearly states that the needs of the airline and the consumer must come first.

Question-Could the applicant please confirm whether the commercial benefits of aviation industry/customers are a higher priority, than the quality of life of those affected by airport operations as part of GCG?

The applicant appears to have misinterpreted my question. I did not mean that the return sector of a night arrival be cancelled, but the whole rotation. The aircraft and crews would then be in position for the first wave departures of a day.

The applicant has implied to the ExA that the rights of the local population are of the highest importance in their GCG plans, yet their response, which appears to be a complete intransigence to even consider a night flight ban for from 2300-0600, apart from late running flights, would show to me yet further evidence that GCG will have no benefits to the local community in reducing noise and emissions?

I.D 10

No comment at this time

I.D 11

The applicant stated that a night closure could lead to current operators moving routes to other airports. Could the applicant detail which London airports those flights could be moved to, as apart from Southend airport, all the others Heathrow/Gatwick/Stansted, are also slot constrained during the night period?

In response to this the applicant stated the following:-

If the airport was unable to operate at night, it is likely that the airlines would transfer their based aircraft to airports where such restrictions do not exist or there is spare capacity. This could include, inter alia, airports such as Gatwick, Stansted, East Midlands, Birmingham. It is also possible that the airlines would move aircraft away from the UK altogether as aircraft are mobile assets and the airlines will deploy these aircraft where they can operate with maximum efficiency

Questions-How could an airline transfer based aircraft to another airport, either in the UK or abroad, unless they had the slot capacity, or access to new slots at those airports?

How can the applicant state that airlines would leave the airport if a night ban was instigated, when in the 25 years since the operating concessions was introduced, neither operator or owner has considered such a ban?

The applicant has implied to the ExA that both itself, the operator and the airlines are fully aware of their responsibilities to those affected by airport operations, particularly during the night period. Yet the applicant's response to me clearly shows that commercial success is more important than public accountability.

As I have previously pointed out, GCG will only be fleshed out when the DCO is granted, as it will be the airport operator at that time who will assume responsibility for it, and what it entails.

The responses to I.D 11 clearly show to me that nothing will be allowed to thwart maximising commercial income, as I have always feared, as recent history factually shows that neither the applicant or airport operator, can be trusted by the public to act responsibly.