

The Harpenden Society (“The Society”)

Any further information requested by ExA under Rule 17

Luton Rising (“LR”) Development Consent Order (“DCO”) application

- 1 The Society was an Interested Party at the 15/00950/VARCON inquiry. We submitted evidence on the forecast economic benefits and the fleet forecasts used to calculate, amongst other things, noise levels.
- 2 We appreciate that this only gave us limited rights to participate in the Inquiry.
- 3 We note that the Inspectors, on fleet forecasts, preferred the evidence of the applicant and cited as one of the reasons (alleged) errors in our forecasting “clarified and corrected by the Applicant in a subsequent note”.
- 4 We note that the Applicant’s clarification (part of which was included in the Inspectors’ report at IR8.94) included the comment that *“First, in relation to Wizz, Appendix 11 of Mr Wingfield’s note refers to Wizz’s network-wide (across Europe) fleet renewal program. However Wizz are expected to fly a greater proportion of A320s from Luton (as opposed to A321s). The reason for this is that Wizz will want to preserve the frequency of their flights and network breadth. If Wizz were to fly entirely A321s from Luton, then due to the additional seat capacities on the flights and the passenger cap, Wizz would have to reduce their flight numbers by around one tenth (one for every five A320 movements it currently operates, with the current operation split evenly between A320s and A321s). This would not be possible on some routes which are only served by, say, two flights a week. Operating some smaller aircraft on certain routes will enable Wizz to maintain frequency and the breadth of the network which they fly to. Mr Wingfield may have adopted this invalid assumption based on a misreading of Wood’s Clarification Response on Noise Issues (August 2021) included at Appendix 1 to HS’ note. The statement made in that note (highlighted in green) related to fleet renewal i.e. modernisation. It did not state that the fleet mix (i.e. A321s vs A320s) would be the same at Luton as across the entire network and that is not a valid assumption.”*
- 5 Barely six months after this evidence was submitted to the Inquiry, Wizz announced that its whole based fleet at Luton would be A321neos by 2025 leading to the removal of several A320s that were based at Luton (which undermines the overarching argument above). This argument is further undermined by a review of Flightradar for Monday and Tuesday this week which shows that the number of A320 Wizz flights departing Luton airport is 13 out of 96 in total, i.e. 14% of the total. By comparison, Wizz’s 9 November 2023 public results presentation shows 36 A320’s out of a total fleet of 204 aircraft for financial year ending 31 March 2024 (thus A320’s are 18% of the whole fleet). Clearly Wizz aren’t flying a greater proportion of A320’s out of Luton compared to the whole fleet. And just to emphasise the point, the writer of this note undertook some noise observations for the airport in May-July this year and the proportion of Wizz’s A320’s compared to the whole fleet was 28% (higher than the 13% currently but considerably less than the “current operation split evenly between A320’s and A321’s” referred to above at the time of the Inquiry). There is clearly a concerted programme to reduce Wizz A320’s at Luton airport which corresponds directly to the overarching Wizz fleet programme which was the basis of our concerns about the fleet mix presented to the Inquiry – there were far too many Wizz A320s in the forecast.

- 6 The other point addressed in LLAOL's note to the Inquiry, referred to in the Inspectors report as "no assumptions were made about the retirement of aircraft" (IR8.94), is also wrong. We did, we assumed A319's would be retired (in preference to A320's given the lower capacity of the former). LLAOL's note suggests that, because of their age, some A320's would be retired in preference to A319's. We don't dispute that, the only relevant point however is that either a (noisier) A319 or an A320 would be retired and replaced by a (quieter) A320neo and it doesn't really matter which is retired for the purposes of calculating whether the claims of LLAOL with respect to the numbers of A320neo's entering the fleet in subsequent years were valid or not (with the consequential impact on the noise calculations particularly when the noise performance of the A319 and A320 are similar). We accept LLAOL's point (we don't have access to aircraft ages) but it makes no difference to the fact that the number of A320neo's assumed in the fleet by 2028 were overstated and the evidence was that there would still be a majority of older aircraft in the Easyjet fleet.
- 7 We are confident that our forecasts were based on sound evidence and reasonable conclusions – the above shows that the same cannot be said for the "correction" submitted by LLAOL – clearly their conversations with airlines either did not take place or the airlines were economical with their explanations, if they did (that wouldn't surprise us – it is commercially sensitive information). We can only speculate why they made the point about retirements knowing full well it wouldn't alter the substance of the point we made.
- 8 We had not intended to comment on this aspect of the Inquiry but, on balance, feel it is necessary to correct the record given Luton Borough Council's Rule 17 response that appears to try to lend credibility to LLAOL's forecasts (REP4-188 page 2) and its own for this application based on a fallacious premise.

Forecasts

The Panel was satisfied with the airport operator's forecasts for fleet modernisation which was directly informed by information from the airlines (such as Wizz, easyJet and Ryan Air) [IR15.14]. That information showed that fleet modernisation has risen from 6% in 2019 to 32% at the time of the Inspectors' consideration and was expected to rise to 88% by 2028 [IR15.12]. The airport operator's information has informed the Applicant's forecasts for the DCO.

- 9 That said, we do appreciate the extent to which the ExA has sought from LR evidential support for its fleet forecasts.