

Comments on AS-125 Need Case Revision 1

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- 1 Our position is that local residents will pay the price for this DCO in the form of increased emissions, congestion and – particularly – increased noise.
- 2 Noise compensation in the form of insulation is only effective indoors, and only to those deemed eligible for insulation.
- 3 Noise does not stop at the lowest eligibility contour either – it is all around. It is outdoors that the greatest impact will be and it is here that resident’s gardens become no-go areas because of Air and Ground noise.
- 4 We residents have already absorbed a doubling in total ATMs between 2014 (75,616) and 2019 (141,858) with consequential impact on our ability to enjoy our outside spaces. The Applicant is intending to increase the number of ATMs to 209,000 under the Core Planning case in Need Case [AS-125] Table 6.9. This is an increase in the number of ATMs of almost 200% since 2014. This can only be defined as SIGNIFICANT in any language.
- 5 Yet the Applicant presses ahead with ‘mitigation’ and ‘compensation’ comparing ever-increased baselines, so as to make this DCO appear to have less significant impacts and therefore hoping to meet the letter of the Local Plan LLP6 iv which specifically mentions the word ‘Significant’.
- 6 Note that in Need Case [AS-125] Table 6.9 under ‘Without Development’ the Applicant has maintained the number of ATMs as a constant 138,100 per annum. This is misleading since under normal conditions – and as assumed in the Do Something case - Next generation and New generation aircraft will come into service just as they would when fleets cycle. Airlines are not going to keep maintaining or buying obsolescent aircraft. Thus larger aircraft will take more passengers per ATM, thereby reducing the ATMs and by association, overall noise impact even for the Do Minimum case..
- 7 Figure 6.13 of the Need Case reinforces this in that passengers per aircraft increases over time for the Do Something case but not for the Do Minimum.
- 8 Chapter 16: Noise and Vibration [REP1-003] Tables 16.26, 16.34, 16.41, 16.48 show the Evolution of daytime air noise and Tables 16.27, 16.35, 16.42, 16.49 show the evolution of night-time air noise baseline. In all cases the ‘Do Minimum’ results in a lowering of contour area over time which -if full capacity is assumed – can only mean a reduction in ATMs or noise per ATM, or a combination of both.
- 9 Furthermore Figure 6.13 has a start date of 2024 (does not specify where within that 12 month period) assuming permission is granted. This is contrary to what one would expect, i.e. all the different PATM graphs should start from the same point since there will be no

physical infrastructure development at that stage.

- 10** Paragraph 6.6.18 refers to the airport reaching 18mppa capacity in 2023. This contradicts Table 6.5 which shows 16.8mppa in 2023. The Airport Operator has been granted an extension to 19mppa which we assume is intended to be applied in 2024, as shown in Table 6.5.
- 11** Table 6.8 gives the number of Passenger ATMs for 2024 as 105,000 for the Do Minimum and 110,890 for the Core Planning case. However since as stated in Paragraph 6.6.18 the airport will reach 18mppa capacity in 2023, and CAA figures for Passenger ATMs in 2019 (18mppa) was 112,209 this implies a reduction in ATMs of approximately 7,000 for the same passenger numbers. This trend is not likely to decrease either as fleets change.
- 12** Currently, passenger aircraft do not fly direct from Luton Airport to Orlando or Cancun and the Applicant has advised in footnote 193 page 110 of the Need Case **[AS-125]** that this used to be the case. The Applicant does not explain the reasons why this has stopped – was it lack of demand or a high Quota Count on departure/arrival because of the short runway, or some other reason. If so the expectation of a resurgence in long haul flights is presumably based on technological improvements (Next Generation/noise reduction/fuel efficiency perhaps) that are some distance into the future. Current projections imply that zero-emissions aircraft will not come into service until the late 2030s and even then, one of the greatest challenges is range. Yet the 32mppa includes some 2.2mppa long haul, which seems optimistic.

14 Glossary

ATM	Air Traffic Movement
ICCAN	Independent Commission on Civil Aviation Noise
JZMF	Jet Zero Modelling Framework
LA	Local Authority
LBC	Luton Borough Council
LR	Luton Rising
LOAEL	Lowest Observable Adverse Effect Level
LLA	London Luton Airport
LLAOL	London Luton Airport Operations Limited
NAP	Noise Action Plan
NAPDM	National Air Passenger Demand Model – econometric model of unconstrained trip demand by passenger markets
NIS	Noise Insulation Sub-committee (of the Consultative Committee)
NOEL	No Observable Effect Level
mppa	million passengers per annum
SOAEL	Significant Observed Adverse Effect Level
UAEL	Upper Adverse Effect Level
UKHSA	UK Health Security Agency