

January 2024

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.142 Applicant's Response to Issue Specific Hearing 8
Action 22 - Proposed Odour Reporting Process (Tracked
Change Version)**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.142

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.142 APPLICANT'S RESPONSE TO ISSUE SPECIFIC HEARING 8
ACTION 22 – PROPOSED ODOUR REPORTING PROCESS
(TRACKED CHANGE VERSION)**

Deadline:	Deadline 8
Planning Inspectorate Scheme Reference:	TR020001
Document Reference:	TR020001/APP/8.142
Author:	Luton Rising

Version	Date	Status of Version
Issue 1	December 2023	Additional Submission – Deadline 6
Revision 1	January 2024	Additional Submission – Deadline 8

Contents

	Page
1 Introduction	1
2 Existing complaints procedure	2
3 Proposed Odour Reporting Process	2
4 Summary	3
Glossary and Abbreviations	4
References	5

Figures

Figure 3.1: Summary of proposed odour management process

1 INTRODUCTION

1.1.1 This document has been prepared by Luton Rising (a trading name for London Luton Airport Limited ('the Applicant')) to outline an odour reporting system in response to item LBC70 in the **Statement of Common Ground with Luton Borough Council (LBC) [REP2-020]**:

"LBC agrees with the odour impact methodology and results and requests additional information on odour report methodology."

1.1.2 This note describes the proposed methodology for the odour reporting system mentioned in section 2.7.b of **Appendix 7.5 Outline Operational Air Quality Plan [APP-065]**:

"Implement a system to record odour complaints and take action to identify the cause and what mitigation can be implemented and review the record of complaints on an annual basis."

1.1.3 This note refers specifically to the operational phase of the airport, any construction related odours would be managed via the Code of Construction Practice (COCP) in **Appendix 4.2 of the Environmental Statement (ES) [REP4-011]**.

1.1.4 Complaint information is useful data for assessing the odour environment of an area, however, it does have its limitations (as reported by Environment Agency (Ref 1) and research (Ref 2)). There are currently no established criteria for determining how significant the number of complaints received are for a site. It should also be noted that research (Ref 2) suggests that complaints increase when the profile of a site has been raised, for example when a new planning application is made or following an incident at a site.

1.1.5 The Environmental Impact Assessment concluded the residual effect of odour due to the Proposed Development was not significant, as reported in section 7.9 of **Chapter 7 of the ES [AS-076]**.

1.1.6 The proposed odour reporting system considers the ES conclusion and also the limitations to complaint data to provide a proportionate and robust process.

1.1.7 Odour is typically due to a mixture of substances in the air. Typically, airport related odour is anecdotally linked to jet fuel or the burning of jet fuel as a result of aircraft activity. The potential airport activities that could be linked with odour emissions include:

- a. fugitive jet fuel emissions from apron and fuel farm activities;
- b. aircraft activity (engine testing, landing and take-off (LTO) cycle);
- c. any potential future water treatment plant included in the Development Consent Order (DCO); and
- d. fire training ground activities.

1.1.8 Quantifying odour risk is challenging due to the varied sources and subjective nature of odour impacts. Equally, the measurement of odour is challenging as

the compounds are often at concentrations below the detection limit of instruments.

2 EXISTING COMPLAINTS PROCEDURE

- 2.1.1 At present there is no specific procedure for odour complaints. However, complaints can be made to the airport operator via the online '*Reporting a noise incident*' system (Ref 3). No other information about the nature, timing or intensity of the odour is requested, although can be provided.
- 2.1.2 The proposed odour reporting process will follow guidance set out in the Environment Agency H4 odour management guidance (Ref 4).

3 PROPOSED ODOUR REPORTING PROCESS

- 3.1.1 A new odour complaint record system, allowing the public to submit complaints online, will be established in agreement with the operator to gather complaint data. ~~The online submission system is proposed to be similar to the current noise system as far as practicable.~~ The reporting process will include clear reference on how to report the complaint to ~~Luton Borough Council~~ the relevant local authority and complainants will be advised to contact the relevant local authority should they have outstanding concerns. The implementation of a system will be secured by the **Appendix 7.5 Outline Operational Air Quality Plan [APP-065] of the ES.** In addition to online submissions, the public will be able to contact the airport in writing and by telephone, which is currently available methods as an option.
- 3.1.2 The odour complaint record system would allow capture of the following information:
- the location of the odour being experienced;
 - the intensity;
 - the nature of the odour (e.g. fuel, chemical, sewage);
 - the duration of the odour; and
 - the time of day.
- 3.1.3 Once the new record system is implemented, a five-step process would be followed as detailed in Figure 1.
- Complaint received.
 - Review: undertake a review of the complaint and any relevant airport related activity at the time and in the vicinity of the complaint to consider if it indicates airport activity as the source (e.g. unusual aircraft activity, fuel spill, fire training).
 - Investigation: should the review suggest further investigation is required, undertake appropriate monitoring. In most cases this would take the form of sniff testing or an odour diary¹ (methodology detailed in H4 guidance)

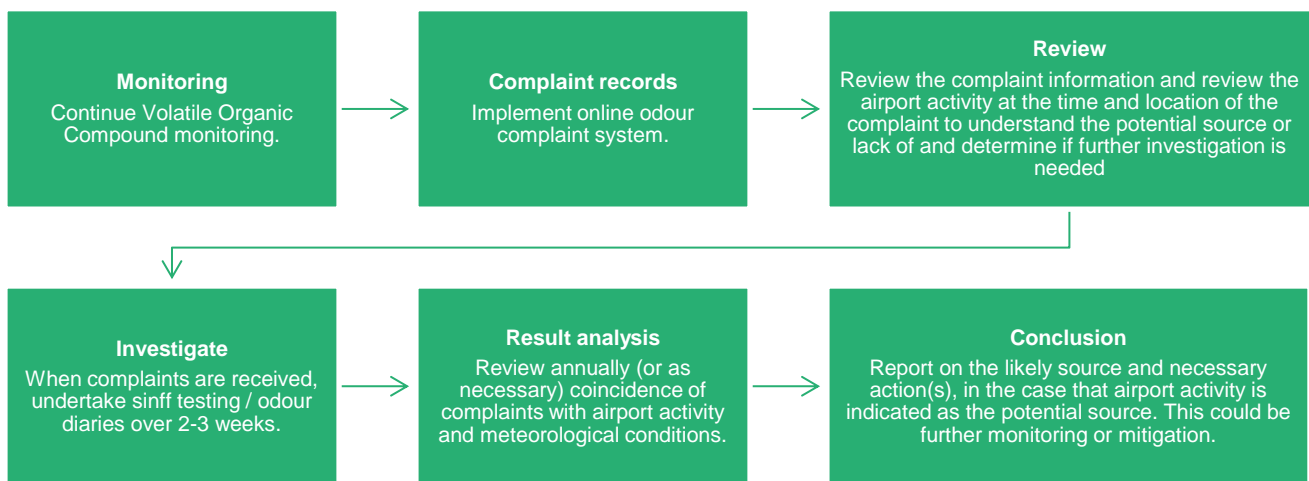
¹ Odour diaries can be undertaken by the operator or complainant. Although care should be taken as this may be vulnerable to bias, as stated in the H4 guidance.

to help provide a longer term view of odour for a particular location or resident or business (e.g. over 2-3 weeks).

- d. Analysis: review of complaint incident and sniff testing/odour diary against airport activities, flight schedules, fuel refuelling and meteorological conditions.
- e. Reporting: Respond to complainants with feedback in a timely manner. aQuarterly and annually report on complaints received (if required, i.e. complaints received) with relevant details of the complaints received and analysis undertaken and share with relevant local authorities. And proposed actions to further monitor or implement mitigation.

3.1.4 The air quality monitoring of volatile organic compounds (VOCs), detailed in **Appendix 7.2 of the ES [APP-062]**, will be continued beyond 2043 as stated in the Outline Operational Air Quality Plan in **Appendix 7.5 of the ES [APP-065]** to support health related elements as raised by stakeholders and to support odour findings. Tools such as Openair (Ref 5) could be set up to quickly review conditions and sources of emissions to indicate possible sources and risks based on meteorological conditions.

Figure 3.14: Summary of proposed odour management process



4 SUMMARY

4.1.1 The proposed process in this note has been developed to be proportionate and robust in the context of existing assessment results and concerns raised by stakeholders.

GLOSSARY AND ABBREVIATIONS

Term	Definition
ES	Environmental Statement
LBC	Luton Borough Council
LTO	Landing and take-off
VOC	Volatile organic compound

REFERENCES

Ref 1 Environment Agency (2002) Assessment of Community Response to Odorous Emissions [Microsoft Word - LP3-ENAG00A27.doc \(publishing.service.gov.uk\)](#)

Ref 2 Bull, MA and Fromant, EL. The performance of numerical odour assessment for the prediction of complaints from wastewater treatment works. *Water and Environment Journal*, March 2013

Ref 3 [Reporting a Problem | Incident Report | London Luton Airport \(london-luton.co.uk\)](#)

Ref 4 Environment Agency (2011) H4 Odour Management

Ref 5 Defra, UK Air, Air Information Resource, Data, Data archive, Openair – data analysis tool: <https://uk-air.defra.gov.uk/data/openair>