Applicant's response to Deadline 7 submission (APP 8.175)

Section 2.7 Design I.D. 1-4

These responses are in reply to questions about the fuel storage capabilities of the current fuel depots, regarding Phase 1 growth to 21.5 million passengers per annum.

I.D 1 –no further comments

I.D 2-The applicant does not state definitely as to if the pipeline intended to service the new fuel farm, will have capacity to actually meet that requirement. It has conducted sensitivity testing.

When airlines increase throughput, they will have to have a guarantee of fuel supply, therefore any sensitivity testing will be made irrelevant, as supply demand will have to be met, irrespective of the environmental impacts of delivering that supply.

The applicant states that potentially the current storage facility could be supplied by pipeline from the new fuel terminal to the East of the development, either by tanker or pipeline connection.

The suggestion of a pipeline connection is clearly a false statement by the applicant. Any linking pipeline would have to run through airport site, and would generate significant disruption to airport operations. The site for Terminal 2 development was specifically chosen to bring no disruption to those operations whilst in development, so any suggestion that they would be willingly interrupted is extremely hard to believe?

I.D 3- The applicant and the fuel providers have decided that current fossil fuels and sustainable aviation fuels (SAF) will be blended off site and therefore no separate storage would be required.

This infers that all operators, both airlines and executive jet, will be using a blend of SAF and current fuels.

Neither the applicant or fuel providers can make that assumption as fact. Current production methods for SAF mean that it is at least twice the price of jet fuel, due to production costs and the small scale production at present. This price may of course lower as production increase, but that is not guaranteed.

Therefore the applicants/fuel company's assumption that no separate facility will be required for storage cannot be relied upon, and separate storage arrangements should be included in this application. Neither the applicant or the fuel deliverers have any say or control of this issue, it is solely down to the needs of the aircraft operator.

I.D 4-Document AS-124, 5.22 14-15 covers electrical powered aircraft, and the provision of refuelling services for such aircraft. It contains the following statement:-

"Whilst electric aircraft are being developed now, commercially and operationally viable aircraft of the size which the Proposed Development would serve will not be available for some time. Although the impact and detail of these new technologies remains uncertain, the Proposed Development has been designed to safeguard for the potential future use of electric aircraft"

How can the applicant design/safeguard/deliver for electric powered aircraft, when it states that such aircraft may not be commercially or operationally viable for the size required for this expansion?

To make such sweeping statements could only be to portray a future without current engine technology, predominantly fossil fuel powered, and thus give the illusion that this development will cut emissions and climate change impacts, rather than just massively expand them?

5.22 16-17 covers hydrogen powered aircraft:-

“The use of hydrogen as fuel for aircraft is immature at present, which makes it challenging to predict at this stage what airports may need to provide to support such technology should it come forward in future. At this stage, it is expected that a transition to the use of hydrogen aircraft would require significant changes to aircraft technology, fuel distribution and fuel storage. Early studies indicate that hydrogen fuel could potentially be delivered by tankers and, as uptake increases, by pipeline.

A transition to hydrogen aircraft is likely to mean that existing infrastructure for current aircraft technologies will no longer be required at the same scale, and the fuelling infrastructure at the airport will need to be reconsidered as a whole to service the transition to hydrogen aircraft.”

The applicant shows little grasp of the complexities currently being experienced by Rolls Royce and other engine manufacturers around the world as the start to investigate hydrogen as a fuel.
They storage temperatures required keeping hydrogen stable, how it is transferred to the engine and stored on board.

https://www.rolls-royce.com/innovation/alternative-fuels/hydrogen.aspx

To suggest that hydrogen could be transported by tankers or pipeline is quite frankly, ridiculous. There are no descriptions of how it would then be stored on site, and delivered to the aircraft parking aprons, yet another example of how this application which claims to be future-proofed, clearly is not?

All the responses by the applicant indicate to me that, to use a phrase I have used previously, this development will be defined by the “make it up as we go along” mantra that has been a keystone of all recent developments by the applicant.

Section 2.17 Surface Access I.D 27

The applicant made the following responses:-

“In considering the design of the Luton DART the Applicant was of course mindful that future expansion of the airport was always a possibility that should be considered, even if at that time specific plans had not been developed or considered. It was therefore prudent to design the Luton DART such that it allowed for possible future extension which would minimise likely future disruption to the operation of the airport. The fact that the Luton DART system was specifically designed to be future-proofed for possible unspecified future extension, does not follow that it must therefore be early facilitating works for a future second terminal as indicated by Mr White. On the contrary, it shows that it could not be considered as a facilitating work as no location for future extension had been identified at that stage. The Applicant further notes that, notwithstanding its clear position that the Luton DART was not a facilitating work for future expansion, even if it had been such that would have no effect on the current application for development consent.”

Could the applicant please explain the statement about future-proofing DART design for unspecified expansion? How can they design for something which they say wasn’t a consideration? Either the applicant was planning with expansion in mind, or it was not? If as stated it was not, then why do they feel the need to qualify that statement with the potential expansion reference?

Could the applicant detail potential developments sites which would have required a DART expansion, excluding the option of a South side option, which was never an option as per details in the first non-statutory consultation documentation? The other sites were all developments of the current terminal area, and the site of this application. Therefore only one site required a DART extension, Wigmore Valley Park, the site of this application.

I also note that the document which could answer all my questions, the unredacted DART business case has not been lodged with the Inquiry. If the points I raised are irrelevant as seems to be the applicant’s stance, then full access to that document closes all my arguments down?

The reasons above, are why DART has a direct effect on the current application. Its construction takes out the need to link a second terminal into the Parkway Station. How is it logical to have two separate systems running to the same rail terminus?
DART also takes a substantial slice of development costs out of this application. By providing this project in advance, it fits the remit to make the development more appealing to any private investors, as those costs have been met already.

“In respect of Mr White’s comments relating to [then named] New Century Park and the Century Park Access Road, the Applicant yet again notes that that application, and its content, does not form part of the proposals subject to the current examination. Notwithstanding this, the Applicant notes that the material referenced via the Hitchin Forum website is from a pre-application consultation on the New Century Park proposals undertaken several months before the application was submitted. The application subsequently submitted in December 2017 included the Eaton Green Road link, the Transport Assessment and all other relevant information relating to that application was submitted at the same time and set out, amongst other matters, the justification for the link. There is no attempt to‘re-write’ history as suggested; all the relevant information has been in the public domain throughout”

The New Century Park Access Road (CPAR), as you are aware, has now been transferred to this application, and renamed. This road was initially for the delivery of an industrial unit development, and as can be seen did not include the Eaton Green Link Road, until later unspecified design changes required it.

The fact that the same road design fits delivery of a mid-sized industrial estate, and a 14 million passenger per annum terminal site, is quite some coincidence?

Like DART, the fact that this road to the development site should have been delivered to the point of opening by now, and outside the development costs of this development, is also quite some coincidence? The planning and development costs have been removed from this application, so that is another direct effect on said application?

As has been mentioned in other objection submissions to this Inquiry on the Eaton Green Link Road, it is against the Local Plan, a legally binding document for Local Authorities. Planning Laws which any other developer would have to adhere to, have yet again, been massaged by the applicant, and LBC, to fit their plans.

Therefore, the applicant’s reference to “re-writing history” can be read as correct, as the history and intention of CPAR, and airport expansion, has been continually re-written by the applicant, with the aid of its parent LBC, before submitting this application, to ensure that it all fits the requirements of that application.

The applicant states that all relevant information has been in the public domain throughout.
This is also not correct. LBC discuss Committee items regarding the applicant, and its projects, without the public under a 1972 Local Government Act regarding commercial secrecy.
The only relevant information in the public domain is that which the applicant and LBC want to be in that domain.

For the benefit of the ExA, I submit these observations in an attempt to show that the applicant cannot be trusted by the public to abide by any supposedly legally binding conditions i.e. Green Controlled Growth, as they have a proven ability to bend current legislations and conditions to meet their objectives.