M Reddington Comments on Deadline 9 Submissions - Need Case Rev 1 – ID 20037459

Contents

19mppa application	Application 21/00031/VARCON on the LBC Planning Portal – submitted by LLAOL to LBC to further increase noise contour limits and the passenger cap
2022 inquiry	Planning Inspectorate Inquiry (ref APP/B0230/V/22/3296455) into the called-in decision by LBC to grant the 19mppa application
Airport	London Luton Airport
Airport Operator	London Luton Airport Operations Ltd, currently the concessionaire at the Airport
Applicant	Luton Rising (London Luton Airport Ltd)
Application	This application TR020001 for a Development Consent Order
ATM	Air Transport Movement, hence ATMs is a count of the number of flights
BAP	Bickerdike Allen Partners
KPI	Key Performance Indicator
LBC	Luton Borough Council, ultimate owner of and Local Planning Authority for LLA
LLA	London Luton Airport
LLAOL	London Luton Airport Operations Ltd, the operator of LLA
mppa	'million passengers per annum': a measure of an airport's passenger capacity or actual passenger throughput
NEDG	Noise Envelope Design Group
NIS	Noise Insulation Sub-Committee
noise contour	An outline on a map enclosing an area in which the 8-hour or 16-hour logarithmic average of aircraft noise for an average day in a defined 92-day summer period equals or exceeds a given value, expressed in terms of LAeq for an 8h or 16h period
NTSC	Noise and Track Sub-Committee
Project Curium	Application 12/01400/FUL on the LBC Planning Portal – submitted by LLAOL to LBC in 2012 for development works to increase LLA capacity to 18mppa by 2028
SOAEL	Significant Observed Adverse Effect Level

Table 1: Comments on Noise and Vibration Information [REP8-078]

In REP8-078 we raised the following query with the Applicant:

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Table 1: Comments on Noise and Vibration Information [REP7-013]

ID	Para.	Comment
1	**Tables 8.3, 8.4, 8.5**	The Applicant has stated in REP7-056 No. 2.8 that Ground Noise is modelled only, and not monitored. In REP7-013 the Applicant compares Ground Noise for 'DS' against that of 'DM' for 2027 (Table 8.3), 2038 (Table 8.4) and 2043 (Table 8.5). In every case the increase in Ground Noise between the 'DM' and 'DS' case is typically less than 1 dB - and even in some cases the ground noise for 'DS' is actually less than for 'DM'. This does not make sense as there will be little difference in the type of aircraft utilised over the period whether 'DS' or 'DM' yet there will be typically a 50% increase in ATMs for 'DS'. I commented in REP6-153 'Need Case' that the ATM figures for the 'DM' case over the whole of the Project were greater than they should be given newer, larger aircraft. I expected the Need Case to be amended appropriately or at least elicited a response from the Applicant. REP6-153 is reproduced in Appendix B for information. If these 'DM' ATM figures (130,000 ATMs per annum consistently) are being used to advise Ground Noise contours then they must be amended. In respect of monitoring Ground Noise the Applicant has advised that it is difficult to extract Ground Noise from Traffic noise or Air Noise Comments on the modelling and measurement of Ground Noise are to be found in responses to REP6-067

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Table 2: Relevant Applicant's Comments in Deadline 9 [REP9-051]

I.D	[REP9-051] ID ref.	Summary of Matter Raised Requiring a Response (Verbatim)	Luton Rising's Response	M. Reddington's Response
	Table 2.9 of [REP9-051]: Applicant's Response to Deadline 8 Submissions – Noise and Vibration ([REP8-078 Table 1]]			
11	ID 10	In REP7-013 the Applicant compares Ground Noise for 'DS' against that of 'DM' for 2027 (Table 8.3), 2038 (Table 8.4) and 2043 (Table 8.5). In every case the increase in Ground Noise between the 'DM' and 'DS' case is typically less than 1 dB - and even in some cases the ground noise for 'DS' is actually less than for 'DM'. This does not make sense as there will be little difference in the type of aircraft utilised over the period whether 'DS' or 'DM' yet there will be typically a 50% increase in ATMs for 'DS'. I commented in REP6-153 'Need Case' that the ATM figures for the 'DM' case over the whole of the Project were greater than they should be given newer, larger aircraft. I expected the Need Case to be amended appropriately or at least elicited a response from the Applicant. REP6-153 is reproduced in Appendix B for information.	Ground noise is not just influenced by the type of aircraft in the fleet, but the locations of ground noise sources and screening provided. In Phase 1 there are very minor differences with the baseline scenario; however, in Phase 2a there is substantial screening introduced by the raised platform, Terminal 2 buildings, acoustic barriers and the engine run-up bay. Screening is enhanced in Phase 2b when Terminal 2 is completed. Consequently, there are noise improvements for some sensitive receptor locations in the DS scenario when compared to the DM scenario	

I.D	[REP9-051] ID ref.	Summary of Matter Raised Requiring a Response (Verbatim)	Luton Rising's Response	M. Reddington's Response
		If these 'DM' ATM figures (130,000 ATMs per annum consistently) are being used to advise Ground Noise contours then they must be amended. In respect of monitoring Ground Noise the Applicant has advised that it is difficult to extract Ground Noise from Traffic noise or Air Noise Comments on the modelling and measurement of Ground Noise are to be found in responses to REP6-067	No response	

The response in REP9-051 above was only partial (the outstanding text is reproduced in highlight) and ignored the comments previously made against the Need Case in [REP6-153] which appear never to have been answered.

The comments against the Need Case are reproduced in Table 1 below. A response would be appreciated and any changes to the ATMs reflected in an updated version of the Need Case as well as any impacts on Noise and Vibration Chapters 16 and 16.1.

Table 3: Need Case Revision 1 comments submitted in [REP6-153]

ID	Comment
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.

ID	Comment
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