

# Newsletter 61 : October 2020

A short, one-topic Newsletter because there's not much time for folk to respond: our noisy neighbour London Luton Airport Operations Limited, the operator of the airport, has launched a non-statutory consultation to enable passengers, business partners and the local community to have their say on applications to change the airport's current annual passenger cap from 18 million to 19 million and to relax the noise contour planning conditions.

An environmental impact assessment (EIA) is also being carried out to identify any potential environmental effects that the project may have on the surrounding environment and communities. The airport will publish the results of the EIA ahead of the application being made later in the year and will use the findings to ensure that the application best reflects the interests of the local community. **It seeks responses by midnight on 11<sup>th</sup> November.**

The planning applications on which the airport operator is currently consulting combine a bid to relax the annual cap on passenger throughput as well as the relaxation of the noise contour planning conditions which have been systematically breached for the last 3 years and would be needed even if the throughput cap remained at 18 million passengers per year. It appears to be premature in the light of the Covid effects on air travel and the general uncertainty in the aviation industry. [In what follows, comment on key extracts from the two main components of the consultation documents \(Environmental Impact Assessment \(EIA\) and draft Master Plan appear in blue and may be useful reference points in responses to the consultation – all the documents can be retrieved from the \(rather slow\) WEB site: \[www.luton19mppa.info\]\(http://www.luton19mppa.info\).](#)

[Both are draft versions, so may change.... There appear to be too many inherent assumptions that "you'll hardly notice the effect" in the draft documents, and too much to take on trust.](#)

Quoting from the **draft Master Plan** (82 pages), the airport throughput over the last 10 years has been:

Year	passengers	changemovements	change
2010	8,751,598	95,604	
2011	9,526,659	8.9% 99,287	3.9%
2012	9,630,969	1.1% 98,732	-0.6%
2013	9,709,149	8% 97,596	-1.2%
2014 *	10,500,132	8.1% 103,928	6.5%
2015	12,279,176	16.9% 116,412	12.0%
2016	14,551,774	18.5% 131,536	13.0%
2017	15,799,219	8.6% 135,538	3.0%
2018	16,580,725	5.0% 136,267	0.9%
2019	17,999,969	8.6% 141,481	4.8%

[\\*this was the year during which, as recorded in the LLAL Annual Report and Accounts, "financial incentives", of unspecified scope, were given to encourage growth which, as evidenced above, had](#)

previously been relatively low.

The subsequent very rapid growth has always been described by the airport owner, the Planning Authority (conveniently, the owner) and the airport operator as “unexpected” - disingenuous to a fault. The breaches in the noise contours arose directly from the incentive for expansion, created by the airport owner in 2014, coupled with over-optimistic assumptions about the bringing into service, and the noise performance, of newer aircraft whose noise performance was, at the time, only a set of forecasts. Even now the noise performance on arrivals of one of the new types (A321NEO) appears not to be as good, at Luton, as forecast.

It is expected that by summer of 2021 airlines will be required to use their allocated slots if they want to retain slots that are deemed to hold value. Therefore, **aircraft movements** are likely to go back to pre-pandemic levels. Despite that, **passenger volumes** will need some time to get back to year 2019 levels due to the average number of passengers per flight is not expected to recover as fast as the number of operations. [This ungrammatical statement implies a number of aircraft being operated empty or very lightly-loaded merely to retain landing or takeoff slots – not exactly environmentally friendly.](#)

Based on industry expectations and on current pandemic situation, it is expected that the airport will recover to the 18mppa traffic horizon around 2023 and the 19mppa traffic horizon will be around 2024.

Only minor refurbishment works have been considered to expand the capacity of following facilities and no significant expansion works (e.g. structural works, new building, ...) are envisaged in this Master Plan. At the 19Mppa level, shortages are therefore predicted in the following areas:

- Self-Service kiosks.
- Waiting lounge – public seating.
- Immigration.

In terms of airfield facilities, the analysis undertaken in the previous section 3.3 Facilities Requirements has shown that **apron capacity** is not enough to cope with the estimated stand occupation. However, no expansion works are envisaged for taxiways and runway as the existing capacity of these facilities are enough to cope with the forecasted demand:

From this analysis, it is not considered that the proposed increase to 19 mppa is not expected to result in significant noise effects at most noise sensitive receptors. [\\*see comments below on the EIA.](#) However, some mitigation measures are required to ensure compliance with relevant planning conditions and to avoid excess noise exposure at some residential properties.

[But this assumes the replacement of most of the current fleet of A32x aircraft, operated by Luton's busiest airlines \(easyJet and Wizzair\) by their NEO near-equivalents, and by the arrival of Boeing 737Max aircraft which are operated by Ryanair. Airbus production numbers have been severely cut and, even if airlines have the funds to support a replacement programme there is no guarantee that aircraft will be available – or that the airline operators would bring them into service at Luton as opposed to other noise-sensitive airports. A somewhat different story holds for the Boeing 737Max of which, due to the continuing problems in its certification, significant stocks exist.](#)

According to the **draft Environmental Impact Assessment** (EIA : 51 pages):

“Noise levels will be controlled by planning conditions and legal agreement (if relevant). It will be LLAOL’s obligation to meet those at all times including under increased passenger numbers“. **Our experience over the last 3 years is that planning conditions have not been effective in controlling noise levels: they have effectively been ignored by the airport owner, the airport operator and the planning authority. In the light of experience one can therefore have no faith in the effectiveness of any new conditions.**

Initial noise modelling has been undertaken based on the latest forecasts of aircraft movements. Figures A1 to A4, in Appendix A, show predicted noise contours for the main scenarios being assessed. Initial modelling of the scenarios described in 7.3.1 above has identified the following potential increases in noise levels at residences:

<1 dB during the worst-case year of 2021 in comparison with the current planning condition limit for 2021; and

<1 dB during the 19 mppa scenario for 2028 in comparison with the current planning condition limit for 2028.

<1 dB during the 19 mppa scenario for 2028 in comparison with the future baseline predicted in the 2012 ES for 12.5 mppa for 2028.

None of the identified increases in noise level would be considered significant. **But an increase is an increase, and over the years there have been a series of “insignificant” increases whose cumulative effect is significant. This is the equivalent of how the camel sneaks into the tent: first a nose, then a hoof, then a head, then the neck.....**

On the effects on road traffic the EIA states: Thus, it is concluded that the highway network will not show any significant change from the 18 mppa at a 2024 design year level. This assumes significant mode change by passengers, the hope being that more will arrive by rail and use the DART system (when that comes into service). But that has to be a hope only: takeup will depend in part on the cost, as yet unknown but it will need to defray the £200million cost and the cost of operating it, whereas the current bus transfer system is funded by the rail operator.

On the climate change implications the EIA passes somewhat lightly, and unsatisfactorily, over the topic. It assumes, on the basis of no apparent evidence, that:

passengers travelling to and from the airport by rail will increase from 21 % in 2019 to 24 % in the 19 mppa scenario by 2022;

staff travelling to and from the airport by Single Occupancy Vehicles (SOVs) will reduce from 66 % in 2019 to 64 % in the 19 mppa scenario by 2022; and

an increase employee travel by sustainable modes of transport including increasing staff travelling to and from the airport by rail from 7 % to 9 % in the 19 mppa scenario by 2022 and by bus and coach from 9 % to 11 % in the 19 mppa scenario by 2022.

**and, for aviation emissions**

Contractual arrangements with key airlines are based on incentivising efficiency gains through the use of more modern aircraft (particularly the Airbus 320/321/319 Neos). The aircraft forecasts reflect this change over time, with progressive phasing out of the older aircraft being replaced by Neos.

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