

Newsletter 63 : February 2021

Luton Airport Planning Application 21/00031/VARCON

This application, to vary among other items the passenger throughput cap and the noise contour areas, is accompanied by an Environmental Impact Assessment (248 pages), a Planning Statement (58 pages) and an Airport Master Plan (82 pages). In essence, the airport operator wants to get another million more passengers through the airport each year.

The reasons for the current passenger cap and associated noise conditions set by Luton Borough Council include the need to safeguard residential amenity, and to align with the Government objective to limit and where possible reduce the level of aircraft noise. Neither of these positions has changed. Nevertheless the airport operator is seeking to increase both the annual passenger throughput and the areas contained within the day and night noise contour areas. The proposition is as follows:

The amendments are considered by LLAOL to provide an appropriate balance between environmental protection and growth. When the airport was operating at its existing capacity of 18mppa there were breaches of the noise contours due to the higher than predicted growth in passenger demand, the delay in delivery of modernised aircraft (e.g. Airbus Neo and grounded B737 MAX) and disruption in European Air Traffic Control from significant weather events and industrial action resulting in flight delays. Therefore the need to enlarge the noise contour exists independently of the proposed increase of the 18 mppa cap to 19 mppa. The noise contours required for the 19 mppa would not be significantly different to the enlarged contours that would have been needed to operate at 18 mppa. The proposed enlargement would apply until 2028, by when it is anticipated that the introduction of newer, quieter aircraft fleet mix would enable LLAOL to comply with a smaller contour albeit not as small as the contours under the existing condition. The improvements in noise reduction facilitated by new aircraft will bring forward opportunities to reduce the areas covered by the noise contours in the future.

As to the “higher than predicted growth in passenger demand”: we have frequently reminded the operator and the airport owner that this growth was far from unexpected: it was the direct result of financial incentives from Luton Borough Council to the airlines by way of cost reductions – given during 2013 and reported, rather inconspicuously, in the airport owner's Annual Report for 2014.

As to flight delays having abruptly increased in extent, this claim is not borne out by what can be seen from Eurocontrol's CODA (Central Office for Delay Analysis) system, which points out that at the great majority of airports late-evening and early night flights always experience the greatest delays, usually as the accumulation of a series of short delays during the day. Airlines tend to be over-optimistic when scheduling flights, to get “that one extra rotation – more conservative scheduling would virtually cure this problem.

As to the replacement of the current fleet with less-noisy modern variants, this had been the promise from 2012 onwards, and that promise has not been kept. Some of the newer variants have appeared at Luton, but the current picture is of predominantly older types and one of the newer models: the A321NEO, is not living up to the claims of lower noise levels on landing. There is as yet no experience of the way the B737MAX will perform at Luton but it, like the A321NEO, is a larger aircraft and may show, on measurement, that it is no less noisy than its predecessor the 737/800 under Luton conditions. This replacement rate has a profound effect on the estimates of noise in the Environmental Impact Assessment, and with the present financial climate the replacement rate is likely to be slow, and with several airports with the same noise issues as Luton there is competition between them to persuade or cajole their airlines to base the less noisy models at their airport.

In summary: the Environmental Impact Assessment says, though not quite clearly enough, that there is no way that the present noise conditions can be met even with the various expedients in place to minimise the scale of the infringements, and that the size of the increase necessary to make it compliant at 19mppa is very little more than would be needed to achieve compliance at 19Mppa. **That sounds a bit too much like “if you want us to score a goal, you must let us move the goalposts”.** But it is not true that there is any need to enlarge the noise contour merely to make it possible for the airport operator to claim that it is now compliant. The contour areas could be left unchanged, and regular reports of the scale of infringement made: this would act as an effective reminder of the need for continuous scrutiny of both the various expedients in place to limit the extent of the infringement and of the airlines' achievement in replacing their older noisier fleet with less noisy variants. A more appropriate

time to modify the noise contour areas will be during the work on “noise envelopes” which is a part of the work on LLAL's Development Control Order application to virtually double the airport's throughput.

However, from the Environmental Impact Assessment: *The worst case-year for the number of dwellings above SOAEL (Significant Observable Adverse Effect Level) is 2022, when 724 additional dwellings would be predicted to experience noise above SOAEL during the night-time with the Proposed Scheme in comparison with the existing Condition 10 limits. The number of additional dwellings above the night-time SOAEL remains constant until 2023 and then decreases thereafter.*

As mentioned above, this “worst case” position is an optimistic guess, and relies on the rate at which the less-noisy types are introduced as well as the rate at which passenger numbers rise from their present levels. Whatever the case, we're told that with the increase in passenger numbers as many as 746 additional dwellings will be significantly affected at night by more noise.

Other strands in the application: the airport claims that it can squeeze another million passengers through the existing facilities without further development, needing only to make changes to the arrangements for some queues, and it is suggested that the 5% increase in passenger numbers will not add to the congestion in the local road network, in part perhaps through the opening of the DART system, now believed to be opening some time during 2021.

The Planning Statement is atypically coy about any economic benefits of the proposed expansion; perhaps wisely, as it is known from Office of National Statistics data that UK travellers heading overseas spend more than do incoming passengers from abroad: before Covid the national balance of payments deficit in terms of tourism spending was **£32 Billion**. Luton, with 60% of its travellers being UK residents rather than wealthy overseas folk hell-bent on Bicester Park or London's West End, is likely to be doing exactly as described by New Economics Foundation when commenting on the proposal to expand Leeds/Bradford Airport – taking spending power and jobs out of the local economy through low-cost tourist flights: a point we have made at Luton's Airport Consultative Committee but which seems to have escaped the minutes.

The application seeks “room to grow” to assure the airport's existence and the continuation of its position in the local economic firmament, though that is not in doubt. What is in doubt is the rate at which demand for passenger leisure travel may recover. The documents contain some optimistic estimates but in the present climate they appear not to be well-founded, and local communities have been the victims of previous optimistic estimates by airport operators and owners. It is suggested that this application is at least a year premature and should be deferred until more certainty over passenger demand, and the replacement of the noisier aircraft types, is demonstrably under way. It must be confirmed that any financial incentives from the airport owner are focused on accelerating the rate at which this is achieved, rather than attempts to accelerate the growth of passenger numbers.

We suggest that this application is refused, for the reasons set out above.

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