LONDON LUTON AIRPORT
ENVIRONMENTAL STATEMENT
ADDENDUM

LONDON LUTON AIRPORT OPERATIONS LIMITED

JULY 2015

TERENCE O'ROURKE

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Issue / revision	1	Prepared by	Neil Trollope
Reference	158607K	Signature	[redacted]
This document is issued for		Date	20 July 2015
[ ] Information	[ ] Approval	Checked by	Neil Trollope
[..] Comment	[X] Submission	Signature	[redacted]
Comments		Date	20 July 2015
		Authorised by	Ann Bartaby
		Signature	[redacted]
		Date	20 July 2015
		Please return by	N/A

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Introduction

1. This environment statement (ES) addendum has been prepared by Bickerdike Allen Partners and Terence O'Rourke. It accompanies a Section 73 application to vary condition 11i of planning consent 12/01400/FUL. This application seeks to amend one element of the noise controls operated by London Luton Airport Operations Limited (LLAOL). The proposed variation is fully described and justified in the noise report (reference A9501-R03/B), prepared Bickerdike Allen Partners, which has been submitted in support of the Section 73 application.

2. On 23 June 2014, planning application 12/01400/FUL (submitted in November 2012) was granted consent by Luton Borough Council (LBC) for the following development:

   "Full planning application for dualling of airport way/airport approach road and associated junction improvements, extensions and alterations to the terminal buildings, erection of new departures/arrivals pier and walkway, erection of a pedestrian link building from the short-stay car park to the terminal, extensions and alterations to the mid-term and long-term car parks, construction of a new parallel taxiway, extensions to the existing taxiway parallel to the runway, extensions to existing aircraft parking aprons, improvements to ancillary infrastructure including access and drainage, and demolition of existing structures and enabling works. Outline planning application for the construction of a multi-storey car park and pedestrian link building (all matters reserved)"

3. An environmental impact assessment (EIA) was undertaken prior to the submission of the above application due to the nature and scale of development proposed in the original planning application. LLAOL then prepared an ES under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (the Regulations) and submitted it to assist LBC in its determination of the planning application.

4. The ES included assessment of the following environmental issues (each comprising its own chapter):

   - Air quality and climate
   - Cultural Heritage
   - Ecology and nature conservation
   - Community and economic
   - Ground Conditions
   - Landscape and visual impact
   - Noise and vibration
   - Traffic and transport
   - Water environment

5. This ES addendum has been prepared in accordance with the Regulations to assess whether the proposed variation of condition 11i results in any change to findings of the noise and vibration assessment in the original ES (chapter 12). In addition, it addresses any changes to planning policy with regard to noise at national, regional or local level since the original submission.

6. The proposed Section 73 application does not affect the assessment or conclusions of the other chapters in the original ES because it relates only to the variation of operational noise violation limits. Therefore, the ES addendum addresses noise and vibration effects only.

Noise and vibration effects

Planning policy

7. Planning policy was addressed in paragraphs 12.5 to 12.24 of the original ES. They addressed national policy set out in The Future of Air Transport White Paper (ATWP) of December 2003, the National Planning Policy Framework (NPPF) of March 2012, and the Noise Policy Statement for England (NPSE) of March 2010. Also addressed were the saved policies of the Luton Local Plan (2001-2011) together with the emerging Luton Local Plan 2011-2031. It is understood that the examination of the new local plan is due to take place in Spring 2016. Therefore, there is no change in local policy from that stated in the original ES.

8. Regarding national policies, the NPPF and NPSE have not changed. In paragraph 12.19 of the original ES, it was noted that Defra had commissioned a research contract to investigate and advise on numerical values for the new concept of Significant Observed Adverse Effect Level (SOAEL). No outcome has yet been reported, such that numerical policy on aviation noise is only available in the national aviation policy documents. That was the ATWP at the time of the original ES, and is now the Aviation Policy Framework (APF) of 22 March 2013.

9. The ATWP noise policies were discussed in the original ES in paragraphs 12.5-12.13. Chapter 3 of the APF considers noise, air quality and other local environmental impacts; noise is addressed in paragraphs 3.2 to 3.45.

10. Chapter 3 of the ATWP (paragraph 3.14) confirmed the use of the equivalent continuous sound level (dB $L_{Aeq,}$-) and 57 dB $L_{Aeq,16h}$ as the level of daytime noise marking the onset of significant community annoyance. Chapter 3 of the APF (paragraphs 3.15 to 3.17), confirmed the continued use of (dB $L_{Aeq,}$-) and 57 dB $L_{Aeq,16h}$ as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance.

11. Chapter 3 of the ATWP (paragraph 3.6), advised that local controls should operate so that noise impacts are limited and, where possible, reduced over time. Chapter 3 of the APF advised in paragraph 3.12 that the Government's overall policy on aviation noise is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise.

12. Both the ATWP and APF address noise mitigation. Specifically in the APF (paragraph 3.36), the Government advises the retention of the approach given in

the ATWP that is to offer households exposed to levels of noise of 69 dB $L_{Aeq,16h}$ or more, assistance with costs of moving.

13. Both the ATWP and APF address acoustic insulation, and both indicate they expect airport operators to offer acoustic insulation to noise-sensitive buildings, such as schools and hospitals exposed to levels of noise of 63 dB $L_{Aeq,16h}$ or more.

14. Both the ATWP and APF advise that to address the impacts of future growth, airport operators should offer acoustic insulation to any residential property which suffers from an increase in noise of 3 dB or more which leaves them exposed to levels of noise of 63 dB $L_{Aeq,16h}$ or more.

15. The APF also refers to the Airports Commission and its responsibility to advise the Government on additional airport capacity and how this could be met in the short, medium and long term. The Commission published its final report on the 1st July 2015. The Commission unanimously concluded that the proposal for a new north west runway at Heathrow Airport combined with a significant package of measures to address its environmental and community impacts presented the strongest case. The Commission considered other London airports and advised in its final report that the government, and other stakeholders, could support the other airports in developing business strategies to make best use of their capacity.

16. The Government is considering the Commission's Final Report and it will reportedly respond before the end of 2015. With regard to London Luton Airport, the Commission noted the recent planning approval would allow it to achieve a capacity of 18 million passengers by 2025 and deliver an improved passenger experience. The Commission advised that it supported the ongoing discussions to develop the rail service serving London Luton Airport, and noted the agreed western section of East-West rail could also support rail journeys between the airport and local centres such as Milton Keynes and Oxford.

17. Consequently, the APF broadly reflects the same noise policy approach as the ATWP. In conclusion, there has been no material change in national, regional or local level policy with regard to aviation noise since the original ES was prepared.

Noise effect of proposed variation: planning condition 11i

18. The original ES was produced using LLAOL's forecasts of future traffic, which remain unchanged.

19. In the original ES reference was made of noise violation limits for daytime and night-time, as proposed by LLAOL in the planning application (paragraph 12.118). Those proposed for daytime were subsequently adopted by LBC in planning condition 11j. They relate to a phased reduction in daytime noise violation limits reaching 80 dB(A) by 1st January 2020.

20. However, planning condition 11i requires aircraft to operate during daytime within noise violation limits ranging from 85 dB(A) to 76 dB(A) within six months of the commencement of development[1]. Within this very short timescale and in the absence of the ability for this significant reduction in noise violation limits to be

[1] The condition requires aircraft with a Quota Count (QC) classification of 4 to operate at no more than 85 dB (A); aircraft with a QC of 2 to operate at no more than 82 dB(A); aircraft with a QC of 1 to operate a no more than 79 dB(A) and aircraft with a QC of 0.5 dB(A) and below to operate at no more than 76 dB(A).

phased in, many aircraft will be unable to operate within the lowest limit during the daytime (e.g. 76 dB(A)) and so will be fined. That is despite the aircraft meeting the existing ICAO noise standard, and that proposed for the future. This requirement is unlikely to provide incentive for airlines to reduce the QC values of their fleet. The neighbouring competing airport, Stansted, has no such restriction; the daytime noise violation limit there is and will be for several years 94 dB(A).

21. With regard to night-time noise violation limits, the Airport has proposed recently a progressive reduction in limits, and has already implemented the first action setting the night-time noise violation limit at 80 dB(A) (1 April 2015).

22. As part of the Section 73 application, the Airport also proposes as a variation to planning condition 11i, to **reduce** the night-time limits further in 2020 and 2028, so as to reach 77 dB(A).

23. The reason for the progressive reduction is to incentivise airlines to operate quieter fleets. In this regard, the main operators at Luton have placed large orders for re-engined narrow bodied single aisle transport aircraft, see table below. These new aircraft are predicted to be quieter than the current aircraft operating at Luton.

Airline	Future Orders*	Approx. Timescale
Easy Jet	100 (100) Airbus A320 neo	2017 – 2022
Wizz Air	110 (90) Airbus A321 neo	2019 -
Ryanair	200 Boeing B737 max	2019 -
Monarch	30 (15) Boeing B737 max	2018 – 2024
Thompson	60 Boeing B737 max	2018 – 2023

* Figures in brackets relate to options in addition to the firm orders.

24. It is forecast that these aircraft will allow the reduction in departure noise levels compatible with a phased reduction in noise violation limits at Luton. In contrast to the airport's phased approach, condition 11i requires a non-phased in reduction of the night-time noise violation limits with limits within six months of the commencement of development ranging from 82 dB(A) to 76 dB(A). By requiring a non-phased in reduction in the noise violation limits, many aircraft will be unable to operate during night-time within the lowest limit (e.g. 76 dB(A)), and so will be fined.

25. Again, this requirement is unlikely to provide incentive for airlines to reduce the QC values of their fleet, and Stansted has no such restriction; the night-time noise violation limits there are and will be for several years 87 and 89 dB(A).

26. The original ES contained a summary of predicted future airborne noise impact, paragraphs 12.90 to 12.93 and 12.128 and are set out below. The proposed Section 73 application will result in no change to these conclusions.

> *"12.90 The airborne aircraft noise produces significant impact, with an increase in the area affected both during daytime and night-time (see figures 12.11 and 12.12) based on the assumption of no improvement in aircraft noise performance. The daytime impact, as now, will be significant; however the predicted increases in noise level are generally small.*

12.91 The night-time impact, as now, will be significant; and as with the predicted daytime impact the change from current conditions as a result of the proposed development is generally around 1 dB.

12.92 Although the airborne aircraft noise due to the proposed development on the worst case assumption of no fleet modernisation over the next 17 years will result in growth of the noise impacted areas from current (2011) circumstances, the actual increase in noise experienced by the population within the contours will be small.

12.93 The current planning policy (LLA1) relates noise impact to that predicted for 1999 and LBC has requested that the proposed development is considered in the context of this policy. The proposed development will produce an increase (21%) in the noise impacted area during the daytime and a reduced noise impacted area during the night-time. If fleet modernisation occurs as envisaged, the future impact would be approximately the same as predicted for the 1999 development during the daytime and a third less during the night-time.

12.128 The current level of airborne aircraft noise presents a significant adverse impact during the day and night. The level of airborne aircraft noise will remain significant with the proposed development. There are already substantial mitigation measures in place within the NAP to control airborne noise reducing the residual noise impact. These measures will be supplemented by the new package of additional measures, which will assist the Airport in minimising noise emissions, particularly from the nosiest aircraft. The noise insulation scheme will provide effective mitigation for the most affected properties so that the intrusion associated with aircraft noise is reduced in real terms."

27. The future daytime noise and future night-time noise computed in the original ES, assuming either no fleet modernisation or partial fleet modernisation are unaffected by the proposed Section 73 application. The resultant noise impacted areas are reproduced in the table below.

28. Also shown are the contour area limits set by LBC in planning condition 12. They can only be achieved by considerable fleet modernisation. This requires the full co-operation of the airlines to complete purchase of their new aircraft, and then to operate them at Luton as opposed to using them at other airports, for instance those without unreasonable noise violation limits.

SCENARIO	Daytime Area exposed to 57 dB $L_{Aeq,16h}$ and above (km^2)	Night-time Area exposed to 48 dB $L_{Aeq,8h}$ and above (km^2)
Forecast 2028 with development		
Without fleet modernisation	23.7	48.0
With partial fleet	19.5	40.4
Planning Condition: 12		
Immediate	19.4	37.2
Future strategy by 2028	15.2	31.6

29. The approved version of condition 11i or LLAOL's proposed alternative will not lead to a scenario whereby the noise contour limits, as controlled by condition 12, are exceeded. The original ES assessment remains valid in this regard. Furthermore, the residual effects predicted in paragraphs 12.128 and 12.129 remain valid. However, to achieve the lowest future noise possible, the airport requires the full co-operation of the airlines, which would be unlikely with the current version of condition 11i because it will not incentivise operations by the quietest new aircraft.