

Joanna

The following email represents my objection to the revised EIA

Best regards

Andrew

From Andrew Mills-Baker

Local resident

[REDACTED]

[REDACTED]

[REDACTED]

I am writing to oppose the Environmental Statement Addendum issued by LBC to the Public Inquiry in July 2022, prepared by the Wood Group (Wood). I find it confusing in its links to previous iterations and with minimal commentary on the legitimate concerns of the local communities impacted. I remain of the view, that the application to increase annual passenger numbers and enlarging the area of the measured noise contours should have been turned down. Over 900 individuals, and organisations plus adjacent local authorities opposed the applications based on the increased adverse environmental impact, but our views were ignored.

I have the following specific comments:

1. Wood's report purports to be definitive but there is a marked absence of detailed assumptions, we are left with generalisations about such important matters as the timing and impact of fleet replacement and the impact on noise. For example, fleet modernisation has been assumed from general information provided in the public record by airlines. This is inadequate given the impact of the pandemic and the relatively long lead times on aircraft procurement. Why hasn't there been dialogue with the specific operators at Luton and a more accurate forecast based on confirmed new plane orders and retirements and the allocation to Luton?
2. Although this is an update report, released in July, there is no forecast of current year (2022) passenger numbers and aircraft movements. This would assist in assessing the key assumption that annual passenger numbers won't return to the 18m level reported in 2019 until 2025. I can attest from personal observation that the airport has been particularly busy during the summer peak so far.

3. The airport operator has a very poor record of forecasting this key information with respect to previous planning applications, why should these revised assumptions carry greater certainty?
4. There is no attempt to explain in detail how total passenger numbers have increased far faster than envisaged back in 2015. This has had a fundamental impact on noise and other environmental issues.
5. There is a key assumption in the noise contour modelling that new aircraft joining airline fleets carry more passengers and therefore reduce the number of flights and are also quieter. However, there is no mention in this report of the performance of the largest of these new planes in operation at Luton, the A321 Neo. The Airport Consultative Committee was informed last year by the Airport that the noise level at Luton is higher than its certification. This may be because it requires more power to use the relatively short length Luton runway. Indeed, it is understood that the Airport commissioned a trial at the beginning of this summer to require these aircraft to use the full length of the runway to see whether there could be any improvement. What are the results?
6. One of the noisiest of the passenger aircraft in use at Luton is the Boeing 737, the predominant operator being Ryanair. How accurate are the noise profiles of the replacement Max aircraft given the problems with the launch? Ryanair have only just commenced using this plane. As a larger and heavier plane, will its performance also be adversely impacted at Luton, as with the Neo?
7. In summary, I am struggling to make sense of the re-worked noise profiles both in terms of the assumptions used, as I have indicated, and also because there is a lack of a clear and complete comparison to the “without development” position. This information should be provided for all years to 2028 and beyond with reference to the following:
 - a. The existing Condition 10 limit now
 - b. The lower existing Condition 10 limit set for 2028
 - c. Together with the assumption that passengers are held at the 18mppa.
8. I also would like to see noise contours prepared for each year and not just for the start and end of the review period, as the noise levels don’t suddenly change but will move gradually each year. Presumably, they will start to move towards the assumed lower levels before 2028. This would permit local communities to assess actual performance against the modelled assumptions each year.
9. The report acknowledges the significant noise impact on those communities adjacent to the airport and resorts to the supposed benefits of the noise insulation scheme. Not only is the £3,000 grant per property far too low, the number of annual grants has thus far been very small. Moreover, people do not spend their whole lives indoors with all windows and doors closed, particularly in the summer months.
10. Implicit in enlarging the area of the noise contours is an increase in the actual noise levels in those communities directly adjacent to the airport.
11. My objections to the further expansion of the airport go beyond the matters considered in the report:
 - a. A key issue that hasn’t been addressed is the massive conflict in interest where LBC, the planning authority, is also the owner of the airport and, in my view, has been complicit in the rapid expansion of passenger numbers well above those contained in the forecasts that supported previous planning applications.
 - b. How can forecasts of passenger and aircraft movements be taken seriously when Luton Rising “LR”, the airport company wholly owned by LBC, is actively seeking to

- c. There are other ways of mitigating aircraft noise, particularly during the night, which have not been addressed:
 - i. There should be a significant reduction in night flights particularly after midnight and the removal of freight movements carried by particularly noisy freighters that can be handled by other airports
 - ii. There should be a prohibition of the use of reverse thrust braking except in an emergency and certainly not at night.
 - iii. A significant improvement in the size of the noise insulation grant now, as envisaged in the LR proposals.
- d. In respect of other environmental issues, there should be a significant reduction in light pollution which has grown in recent years due to the failure to address this issue during recent terminal improvements. A good example being the two new multi storey car parks that are clearly visible from the rural east side of the airport and which have neither light baffles or LED sensor technology to minimise unnecessary illumination.
- e. There has been an almost complete lack of local road infrastructure improvements in recent years and traffic levels at peak times cause significant unnecessary delays.
- f. As a tax payer, I object to the use of central government funds by LBC to construct a wildly over budget cable car link from the Airport to the train station that has already been written down by the Directors of LR by nearly £200m against the now budgeted £275m total cost, even before it becomes operational

Response	Percentage
Yes	85%
No	15%