

**Luton Airport Public Inquiry**

**Summary Proof of Evidence**

**for LADACAN**

**Seth Roberts, Hayes McKenzie Partnership Ltd**

**3617\_N02\_EXT1, 29 August 2022**

**1. SUMMARY PROOF OF EVIDENCE**

- 1.1 Planning conditions 10 and 12 (since renumbered to 8 and 10) associated with the 2012 planning application (LPA ref. 12/01400/FUL) were a continuation of previous conditions in place at the airport. The overall aims of the conditions were to ensure that aircraft noise impacts would continue to remain below the levels based on actual air-traffic flow data in 1999 and, long term, these impacts should be seen to be reducing through careful planning and noise management.
- 1.2 The Application seeks to vary these conditions (8 and 10 attached to consent for LPA ref. 15/00950/VARCON) which is at odds with the original aims of imposing them. The predicted 2023 night and day contours both exceed the limits for contour area set out in condition 10 which means the impacts are greater than those seen in 1999. There is a projected trend of reduction in the noise contours for future years but this relies heavily on the modernisation of aircraft within the fleet mix which is outside of the direct control of the Applicant.
- 1.3 Information is missing from the ES documents that would allow the reader to understand how the assumed fleet mix has been derived and how it has been incorporated in to the noise model. Additionally, predicted baseline noise levels for the key assessment year of 2028 are unexpectedly high and the combined uncertainty makes it difficult to have confidence in the quantified noise impact.
- 1.4 Pseudo-baseline<sup>1</sup> scenarios have been presented for a number of different assessment years which is misleading and leads to an incorrect assessment methodology that substantially underestimates the noise impact of the airport expansion.
- 1.5 The ES addendum does not present Number Above contours for the 2028 baseline making it impossible to assess the impacts of the proposed changes according to this metric.

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<sup>1</sup> The term 'pseudo-baseline' has been used here to describe the pre-existing 'with development' scenarios that are used to assess change against the proposed 'with development' scenarios. Since a baseline presented within an ES is inherently something which should be a 'without development' scenario, the term 'pseudo-baseline' has been used to clearly differentiate.

- 1.6 Uncertainty associated with changes to the RW26 departure profiles within the noise model brings into question the assessment of absolute predicted noise levels against the benchmark thresholds for LOAEL and SOAEL. The changes to the RW26 departure profiles may not be representative of future scenarios where more heavily laden aircraft would be expected to be taking off more regularly. No adequate validation of the RW08 departure profile changes is documented.
- 1.7 There is a considerable lack of clarity within the content of the ES, revised ES and ES addendum along with missing information which makes it difficult to interpret.