

**TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 77 AND TOWN AND COUNTRY PLANNING
(INQUIRIES PROCEDURE) (ENGLAND) RULES 2000
APPLICATION BY LONDON LUTON AIRPORT OPERATIONS LIMITED (LLAOL)
SITE ADDRESS: LONDON LUTON AIRPORT, AIRPORT WAY, LUTON, LU2 9LY**

Response of The Harpenden Society to the:

Environmental Statement Addendum (ESA) July 2022

Ref: CD1.16 Addendum to CD1.09 Environmental Statement (July 2022)

Thank you for the opportunity to comment on the above. We have limited our comments to noise.

The stated purpose of the ESA is to provide “an update on any changes to the likely significant environmental effects of what is proposed as compared with the 2021 ES Addendum” (para 1.2.2).

Previously, The Harpenden Society has objected to LLAOL’s application on the basis that the proposals re: noise do not meet national and local policy requirements, in particular there is no attempt to limit and where possible reduce noise. The ESA merely reinforces LLAOL’s existing failure to do so.

We are especially critical of the shift of the noise contours out one year to preserve the revised Condition 10 limit (and thus allow more noise headroom) rather than substitute the 2021 ES Addendum limits for the worst year (now 2023). This is despite the ESA claiming that improved fleet modernisation will reduce noise. For ease of reference the relevant contour areas in each environment statement are set out below.

Environmental Impact Assessment (January 2021) 57dB(A) (daytime) and 48dB(A) (night-time) area contours:

Sq km	18mppa 2021	18 mppa 2022	18 mppa 2023	19 mppa 2024	19 mppa 2025	19 mppa 2028
57dB(A) day	21.6	21.1	20.4	19.4	N/A	15.5
48dB(A) night	42.9	42.1	41.9	39.8	N/A	35.5

The ESA provides an update to these figures as set out below:

Sq km	18mppa 2021	18 mppa 2022	18 mppa 2023	19 mppa 2024	19 mppa 2025	19 mppa 2028
57dB(A) day	N/A	N/A	21.1	20.4	19.4	15.5
48dB(A) night	N/A	N/A	42.1	41.9	39.8	35.5

The retention of the ES 2021 Addendum worst case contour area in the proposed variation of Condition 10 (despite the claimed noise improvements in the ESA) caused us to look more closely at the forecasts of aircraft flows.

We concentrated on the aircraft flows for A319, A320 and A321 Airbus aircraft (flown predominantly by Easyjet and Wizz) and compared these to published information from Easyjet and Wizz about fleet modernisation. The data below refers only to the **Day time** flows. Please note that the Annual Monitoring Report for 2019 (the last full year of operations) showed a combined total of 89,796 movements for Easyjet and Wizz and the total number of Airbus aircraft movements for the above aircraft of 92,075. Thus, Easyjet and Wizz accounted for 98% of these movements.

A319/A320ceo/A320neo

The aircraft flows for the 92 day summer peak in the 2021 ES Addendum and ESA for these aircraft are summarised below:

Type	2021 aircraft flows	% of total	2028 aircraft flows	% of total
A319	3,257	19%	49	0%
A320ceo	11,106	65%	1,888	12%
A320neo	2,625	15%	14,088	88%
Total	16,988		16,025	

The clear conclusion is that nearly 90% of this fleet is modernised by 2028.

We have compared this forecast outcome with the published information on Easyjet and Wizz plans for fleet modernisation.

Easyjet

As set out in the Easyjet Rights Issue Prospectus (the Prospectus) in September 2021, Easyjet's fleet was 323 aircraft at 30 June 2021. Using other information in the Prospectus and the documents referred to in the footnotes to 2.3.6 in the ESA we have estimated Easyjet's fleet modernisation up to 2028.

Our analysis shows that by 2028 the Easyjet fleet will about 50% modernised (i.e. comprise A320neos).

The table below shows the equivalent 2021 and 2028 positions.

Type	2021	% of total	2028	% of total
A319	106	34%	0	0%
A320ceo	166	54%	125 163	50 53%
A320neo	37	12%	123 146	50 47%

The attached spreadsheet shows our detailed workings where we have substituted A320neo's for A319's until these are exhausted and then A320ceo's – we have not forecast any increase in the Easyjet fleet over this period (~~but if we did~~ apart from the 18 aircraft switch from A320neo's to A321neo's but if we did this, if older aircraft are retained longer, this would just mean the fleet modernisation % would be lower). Our conclusion holds true even if we accelerated the delivery of existing orders and the aircraft acquired under the purchase rights agreement.

Wizz

As set out in Wizz's full year results presentation, Wizz's 2020/21 fleet comprised 68 320ceo's and 6 320neo's (and comprised 54% of Wizz's total fleet at that date – the rest being A321's). As a result of their fleet renewal and growth plans they expect their 2027/28 fleet to comprise just 40 320neo's (which would comprise just 11% of their total fleet at that date).

If we apply the Wood assumption in their noise clarification letter of 25th August 2021 about fleet distribution around the airlines network:

"In each future year, fleet assumptions were changed to reflect the published fleet replacement plans of each of the major airlines, with assumptions made where fleet plans were unclear. As easyJet, Wizz and Ryanair publish fleet renewal plans as part of their annual reporting over 90% of fleet renewal assumptions were based on publicly available, and verifiable information. This was completed by changing aircraft on individual flights to reflect the mix of aircraft across the entire airline. For example, If Wizz were to have 50% A320 NEOs in 2025 across the entire fleet, this share would be reflected across operations at LLA. For easyJet where they do not operate A321s from LLA, the fleet was calculated excluding this aircraft type."

it will mean the Easyjet fleet at Luton Airport will only be 50% modernised and Wizz will be operating very very few A320neos out of Luton airport so the noise reductions will be smaller than forecast in the ESA and the impacts and harms on people under the flightpath will be larger.

This presents a very different proposition to the claim in the ESA that those affected by noise will be significantly reduced as a result of the modernisation of airline fleets.

A321

Turning to the figures for A321's, we note that Easyjet don't operate the A321 from Luton Airport. This means that virtually all of the aircraft flows for the A321 are attributable to Wizz.

Aircraft flows for the 92 day summer peak in the 2021 ES Addendum and ESA are set out below:

Type	2021 aircraft flows	% of total	2028 aircraft flows	% of total
A321ceo	4,532	81%	0	0%
A321neo	1,046	19%	5,638	100%
Total	5,578		5,638	

The published information for the Wizz fleet for 2021 and 2028 is set out below:

Type	2021	% of total	2028	% of total
A321ceo	41	65%	3	0%
A321neo (incl XLR)	22	35%	336	100%

NB the number of A321neos in the Wizz fleet in 2020 was only 8, which suggests are more accurate reflection of the 2021 number would be an average of 8 and 22 i.e. 15 which would make the fleet %'s for A321ceo's 73% and A321neo's 27%.

Thus, there appears to be a reasonable correlation between the ESA fleet modernisation data and Wizz's published fleet renewal data.

However, our concern, in this case, is not fleet modernisation, but the Wizz seat capacity implied by the modelling in the ESA, especially in 2023, the peak noise year. This is set out in the table below (where we have simply multiplied the aircraft movements by the number of seats available for each aircraft type).

Type & (seats)	Aircraft flows 2021	Total seats 000's	Aircraft flows 2023	Total seats 000's	Aircraft flows 2028	Total seats 000's
A321ceo (230)	4,532	1,042	4,415	1,015	0	
A321neo (236)	1,046	247	3,225	761	5,638	1,331
Total	5,578	1,289	7,640	1,776	5,638	1,331

NB Aircraft flows in 2024 and 2025 are 7,177 and 7,394 respectively so similar to 2023.

These aircraft flows imply a significant reduction in Wizz's operation at Luton airport from 2023 as it won't be substituting A320's for the "missing" A321's as it only expects to have 40 across its whole fleet. We doubt this is anticipated as it would call into question the rationale for increasing capacity at the airport. It also has implications for the assessment of the noise contours as it shows a peak of relatively noisy A321's in the worst noise year (2023) but a falloff thereafter (and it appears substitution with quieter A320neo's).

LADACAN and the four key authorities in Hertfordshire have already raised numerous concerns about the modelling, in particular, the accuracy of the forecasting and also the determination of the baseline. The above analysis raises further concerns about the accuracy of the modelling and we respectfully request the Planning Inspectors subject the numbers and assumptions used in the modelling to an independent audit.

Conclusion

The ESA raises further questions about the accuracy of the noise modelling and doesn't fill us with any confidence that the stated reduction in the number of people adversely affected by noise would stand up to closer scrutiny. Therefore we remain of the view that the proposals are contrary to government and local authority policy and that planning permission should be refused.

Easyjet fleet renewal expectations	2021	2022	2023	2024	2025	2026	2027	2028	2029
A319	106								
Retirements		(8)	(7)	(12)	(11)	(25)	(31)	(11)	
Total	106	98	91	79	68	42	11		
A320ceo	166								
Retirements								(3)	(14)
Total	166	166	166	166	166	166	166	163	149
A320neo	37								
Future deliveries (from 1 July 2021) (note 1)	85	8	7	18	17	17	17		
June 2022 exercise of purchase rights (note 2)	56					14	14	14	14
June 2022 A320 to A321 conversion (note 3)	(18)			(6)	(6)	(6)			
Total	37	45	52	64	75	101	132	146	160
A321neo	14								
June 2022 A320 to A321 conversion				6	6	6			
Total	14	14	14	20	26	32	32	32	32
Total	323	323	323	329	335	341	341	341	341
Proportion of each aircraft in fleet (A319/A320 family only)									
A319	34%	32%	29%	26%	22%	14%	4%	0%	0%
A320ceo	54%	54%	54%	54%	54%	54%	54%	53%	48%
A320neo	12%	15%	17%	21%	24%	33%	43%	47%	52%

Note 1 = deliveries assumed to be evenly spread between 2025-2027 after confirmed deliveries

Note 2 = deliveries assumed to be spread evenly between 2026-2029

Note 3 = aircraft swap assumed to be spread evenly between

NB

Remaining purchase options

Total from 2013 agreement 200

30th June in service 51

Future deliveries 85

June 2022 exercise of purchase rights 56

Balance remaining **8**