

# Newsletter 55 : November 2019

Airport Expansion:  
the Statutory  
Consultation has

started

Readers will not have failed to notice the barrage of publicity from London Luton Airport Ltd (LLAL), a company wholly owned by Luton Borough Council, that heralded the start of the statutory consultation over their plans to, effectively, double the throughput of the airport. For those who have not seen the press notices and are of an enquiring mind they can be found at [www.futureluton.llal.org.uk](http://www.futureluton.llal.org.uk). There are many documents available and some of them are very lengthy, especially when the numerous appendices are included. We're still wading through the several gigabytes of data (and thankful that we took the opportunity for LLAL to send the entire set on a USB stick, which saved our hard-drive space and hours of downloading). Below are edited highlights – the key elements are in bold type and the Summary below says in relatively few words what seems to be the situation.

## Noise Disturbance

We're suspicious, having been conned previously during the consultations which gave rise to the last two expansions, over the likely noise disturbance that'll be caused that this proposal involves an estimated 60% increase in the number of aircraft movements. We're asked to believe that passenger numbers per movement will continue to grow, not by airlines filling every seat but by moving to larger aircraft as has been the recent trend at Luton, where increasing numbers of Airbus A321 has featured. The re-engined ones, only now coming into use, are bigger and somewhat noisier than their A320 relatives, and are already measurably noisier in operation, whether taking off or landing on Luton's relatively short runway, than the certification data suggests : especially when heavily-loaded. On the basis of the complicated and possibly misleading noise appendices 9.1 to 9.7 of the Preliminary Environmental Information Report which forms a major part of the consultation documents, **for the crucial 92-day "summer quarter" the average noise levels at a range locations around the airport will increase, by both day and night, by what's forecast as a "small extent": by between 1.2dBA Leq and 3dBA Leq.**

However the devil, as always, is in the detail – Leq is shorthand for "equivalent, or average, noise level" and the subscript is the period of time over which the average is made. We do not experience aircraft noise as an average noise level: it hits our ears in short bursts of noise followed by lengthier periods of relative or total silence, especially at night when the ambient noise level is low. The day period during which the average is calculated as 16 hours, for the night is 8 hours. When the peak noisiness of an aircraft overflight lasts for perhaps 20 seconds there's a lot of relative silence in between – Laeq is akin to trying to compute an average between 6 bananas and 20 apples: the result is, in practice, meaningless. Things will be far worse for those communities beneath the approach path (for example, Kensworth to the west of the airport and Breachwood Green to the east) because there can be no dispersion of the tracks whatsoever whereas there is an element of natural dispersion for departures.

**Thus the expansion proposals are not consistent with either the National Planning Policy Framework's words on noise: "To mitigate and reduce to a minimum other adverse impacts from new development and avoid noise giving rise to significant adverse impacts on health and quality of life", nor with the contents of Policy LLP6 of the recent Luton Local Plan, which was redrawn in words much more favourable to its airport, that expansion proposals should "include proposals which will over time result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents and occupiers and users of sensitive premises in the area, through measures to be taken to secure fleet modernisation or otherwise...."**

## Surface Access

Quite an issue, and the consultation document is, one suspects, deliberately vague on the likely effect of doubling the passenger throughput. The overwhelming proportion of Luton's passengers live relatively close to the airport (in the past, one of the airports' publicity pitches was that LLA was shorthand for "London's Local Airport"), and almost 90% of them are travelling for leisure and/or "visiting friends and families" rather than business people chasing those economically valuable overseas opportunities. The public transport links available aren't best suited to holiday travellers and at present about 68% of them turn up at the airport by car (drop-off or car park) or by taxi – that's about 12.2 million a year on the local road network, and that proportion has remained fairly static for years despite various "Surface Access Strategies", which claim to have a focus on increasing access by public transport, from the airport operators – who have backed each horse in the race by building several very large multi-storey car-parks within an increasingly-crowded airport perimeter.

LLAL's expansion proposal expresses an aspiration to reduce the car/taxi proportion of travellers to 55%: one assumes, through the DART development; but the takeup of DART will depend on its useability for passengers within the airport catchment area and its fares. But if that 55% proportion is achieved, and there's no guarantee that it could be, **the doubling of passenger throughput would result in an additional load of around 5.5 million vehicles a year – about 14,000 a day - on a local road**

*network which can barely cope today because of the peaky nature of passenger and commuter journey times.*

## The Economy, and Lots of new jobs?

That's what LLAL's consultants York Aviation (purveyors of expensive fiction to gullible councils) suggest. Not much of a surprise to see such impressive claims, which always appear in airport expansion proposals and which are rarely if ever post-audited to see just how wildly exaggerated they were. The writer knows of only one attempt to validate such claims, in the case of the second runway bid at Manchester, which initially "promised" 55,000 additional jobs – best estimates post-hoc could only produce a shade below 6,000. The way the forecast numbers are devised is simple enough: the number of "direct" jobs, which can be counted, then has some very creative multipliers used to produce "indirect" and "induced" jobs – and in the past we've even seen a multiplier used for "catalysed". The technique is fairly common, though it's instructive to compare those used for LLAL's expansion proposal with those used for other large transport infrastructure schemes, e.g. by TFL – you won't be surprised to learn that LLAL's consultants use significantly larger factors to generate bigger numbers.

Checking back at "jobs" numbers against passenger numbers year-by-year as reported in the airport's Annual Monitoring Report suggests that **LLAL's claim of 700 new jobs per additional million passengers is wildly overstated – by a factor of at least 2, if not 3.** And an expanded Luton would not be creating many, if any, additional highly paid jobs: the basics of an airport have long existed, and its airlines are low-cost whose focus, after fuel costs, is on staff costs and thus numbers. Far more likely to see low wage terminal, apron and car parking jobs where staff would be expected to cover 24/7 work patterns including weekends and bank holidays. Some would be offered full time contracts on low pay but too many jobs at the airport are part time or zero hour contracts.

While happily guesstimating the number of indirect jobs, and the economic benefit to the local region, the proposed expansion might achieve, they studiously ignore the negative economic effects of what's often termed the "tourism spending deficit" - we Brits going abroad spend far more per head when on holiday than do inbound tourists: the **balance** UK-wide has for some years been over £20 **billion** a year, which is almost 20% of the national balance of payments deficit, and that's economic activity: jobs and incomes to indigenous businesses, that have been removed from UK. **No account has been taken of LLAL's share of these very real costs to UK plc.** In its "Statement of Need" at para 7.4.10 the issue is airily dismissed: "It would seem reasonable to suggest that outbound tourism will, therefore, have an offsetting effect on the positive impacts from inbound tourism but this is likely to be relatively limited." We don't agree.

Interestingly in a statement which accompanies the PEIR, from Oxford Economics on whose work the lead consultants: York Aviation; have based their estimate, runs *"That is, we estimate and forecast the economic contribution of London Luton Airport, but we do not make any assessment of the extent to which the contribution identified will be additional to what would have occurred in the absence of its future development.* That reads rather like a disclaimer and a suggestion that much of whatever economic growth may happen may **not** be attributable to expanding the airport.....

The scheme has an interesting financial basis: LLAL, in the shape of Luton Council, has so far borrowed, or is committed to borrow, between £440 and £450 million. £225m is for the DART rail link that is only required for a second terminal as the existing bus service is coping with the current terminal: but the £225m only gets it to the existing terminal. If planning permission is granted for a second terminal then newly-completed Taxiways Foxtrot and Delta will need to be cut and covered for the extended track and the cut and cover will then have to continue across an unstable waste tip. That's an awful lot of debt interest to find: presumably by Luton Borough Council? And have we yet seen the projected costs of the second terminal, and have we included the costs of all the remedial work necessary on the local road network?

## Sustainability

As for sustainability: we don't live in Wigmore, but if we did we would be up in arms about, amongst other things, its wildlife park being moved - the LLAL promotional video makes it sound as if something is to be added when in reality farmer's fields in the adjacent county, Hertfordshire (already obliged to absorb thousands of additional houses which Luton Borough claims not to be able to accommodate) appear to be reclassified as parkland while Wigmore Park is concreted over, not for Luton housing but for LLAL's second terminal. The so-called replacement would take years to recover from the effects of artificial fertilisers and regular cultivation to become an approximation to the lost wildlife park.

It's also appropriate to ask how such a proposal is in any real sense sustainable and consistent with the UK Government's position on climate change, particularly for an almost-exclusively leisure-based airport. The airport will bang on ad nauseam about how it's working to reduce its own carbon footprint, while ignoring altogether its effective role in assisting the uniquely damaging effects of aviation emissions at altitude. At least double (some authorities suggest higher still) the global warming effect of burning the same amount of hydrocarbon fuel at ground level: and there are very few trees at 36,000 feet to absorb the exhaust.

And, taken in the round, if the expressed aims of those UK airports with ambitions to expand – and most of them are at it: even little Eastleigh, near Southampton; were added together they'd greatly exceed even the wildest of total passenger forecasts from DfT.

## Summary

The expansion proposals appear to over-estimate the possible economic benefits, under-estimate the adverse effects on the noise climate locally, under-estimate the adverse effects on the local road network, under-estimate the costs of the development, and ignore the global climate change impact of expanding aviation activities altogether.

## Other news

The outcomes of LLAL's applications to vary the terms of existing planning conditions: to relax the noise contour caps for both day and night and the passenger throughput to be allowed to increase top 19Mppa, are still awaited – both were set by Luton Borough Council in part “to protect residential amenity” so it'll be interesting to see how the enforcing body (Luton Borough Council) finds a way to allow its airport to violate its planning conditions. But one suspects that a way will be found – and it's an open secret that LLAL has ambitions to exploit the “permitted development” rules to increase the throughput of the existing terminal to around 21.5Mppa despite Airport Coordination Ltd (ACL), the body responsible for coordination of arrival and departure slots nation-wide, declaring that the existing terminal at Luton is, effectively, solid during morning and evening peak periods and is unsatisfactory. LLAOL has declared some limits to ACL, alongside the summer-special measures aimed at minimising the size of their continuing violation of the night noise contour limit – but a small bird has whispered that despite earlier optimism on the part of the airport that it may scrape just under the barbed-wire for this summer, the likelihood is that violations of both night and day noise contours will have occurred during the summer 2019 period. It's another aspect of the unsuitability of the noise contour areas' unsuitability as a control mechanism, though they're fine as a monitoring tool: the results for the busiest (summer) quarter are not made available until December though one suspects that they may be known, but not published, rather earlier – hence the small bird's quiet song.

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*Your comments and contributions are always welcome – you can contact the EDITOR at The Old Bakery etc.*