



EDLESBOROUGH PARISH COUNCIL

Edlesborough Parish Council Registration Comments re LTN Expansion DCO

Edlesborough Parish Council wish to register as an interested party regarding the Luton Airport DCO for the proposed increase in passenger numbers from 18 million to 32 million mppa.

The village of Dagnall which is part of Edlesborough Parish, is directly beneath the final approach during easterly operations. Dagnall is approximately 7nm from start of the runway and is consequently overflowed by all arriving aircraft during easterly operations. The number of ATMs is therefore critical.

As we understand it, LR are claiming that they can achieve a 78% increase in passenger numbers with an increase of only 48% in ATMs, primarily as a consequence of the use of larger aircraft and higher load factors. However the only overall metric that they are suggesting be included in the consent is mppa, which of course would mean that if the larger aircraft and higher load factors don't materialise, the eventual outcome would be an increase of 78% in ATMs not 48%. **We would like to see an overall cap on ATMs (day and night time combined) as well as mppa.** That way if the load factors don't increase as anticipated, the limiting parameter becomes ATMs rather than mppa.

LR are also claiming that there will be an overall reduction in the area and population covered by the relevant noise contours during the life of the project, despite the increase in ATMs. This is attributed to the predicted noise improvements of the new generation of aircraft that will make up the future fleet. Those new aircraft have already started to be introduced to the fleet and the noise data is showing that the anticipated improvements are not being fully realised in practice, but no allowance has been made for that fact in the predicted noise contours. However even if the predicted improvements are eventually realised, those improvements primarily affect departures and not arrivals. Consequently the shape of the contours will change. The predicted contours shown during the LR pre-consultation clearly showed that whilst the overall area covered by the noise contours might be smaller, the contours generated by arriving aircraft are extended further west into Buckinghamshire. That is due to more aircraft that aren't fundamentally any quieter on the final approach path. **We would like to see a commitment that the 2019 baseline noise contour boundaries will not be extended in any direction, and not simply that the total area under the contours is not increased.**