

1. This Written Representation argues that the existing noise levels in and around Harpenden from aircraft movements related to Luton Airport experienced by residents have increased rapidly and are already unacceptable due to previous airport expansions despite previous assurances by the operator that this would not happen. This historical failure to produce accurate projections should be taken into account in assessing the current projections under the airport's Proposed Development.
2. Chapter 16 Noise and vibration of the ES [TR020001/APP/5.01]. Luton Airports noise modelling assumes aircraft will become quieter as new generation aircraft are introduced. Anyone who has examined the airport's previous attempts at such modelling and the increasing noise due to aircraft will know that these previous models have been hugely over optimistic on how rapidly new aircraft will be operational and how much quieter they will be. This particularly acute for westerly departures overflying Markyate, Redbourn and Harpenden.
3. Similarly, previous "promises" By Luton Airport/operators that changes in airspace control will permit aircraft to climb more steeply have not been fulfilled. The response is simply to state that this is not their fault as it depends on Civil Aviation Authority decisions and then continue to make the same or even more optimistic forecasts and assumptions in the next expansion proposal such as the current Proposed Development. For residents overflown by Luton originated flights, especially over the villages and towns in Hertfordshire such as Redbourn and Harpenden this is simply an excuse and not relevant but it should inform any object assessment of the current proposals. there is a specific step that the Inspection should consider in this respect. A comparison of departures from Luton Airport with departures from Heathrow on the following criteria will inform the enquiry and demonstrate this concern forcefully: the Inspection should quantify and assess for Luton Airport, Heathrow and any other comparable airports firstly, how rapidly the aircraft climb; secondly, the number of different departure routes utilised. Luton Airport should not be permitted any increased flights until it introduces significantly more departure routes and more rapid climbs at the current level in place for Heathrow. The Inspection could avoid too much detail if it simply looked into this comparison when considering all the environmental factors but especially noise.
4. Related to the noise modelling and airspace change proposals, the proposed Development should not go ahead until specific proposals for departure route and climb rates are in place. (See the Green Controlled Growth Framework [TR020001/APP/7.08], see Green Controlled Growth Explanatory Note [TR020001/APP/7.07]).
5. When Luton Airport introduced its westerly departures RNAV operations some years ago it failed to consult properly with residents affected. For example, those living near where the A1081 interchanges with the B487 Redbourn Lane were not consulted properly and many did not even know there was a consultation despite the concentration of departures over them. This was compounded when, despite a huge increase in complaints from residents in Harpenden and other towns/villages, the post-implementation review was very significantly delayed (pre pandemic) with no sensible explanations. The consequence is that there has been no respite from aircraft noise from Luton Airport's westerly departures (80% of the total) for those residents living in Redbourn, Harpenden, Sandridge etc.
6. Contrary to the airport's claims, the noise mitigation embedded into the Proposed Development categorically does not meet the second and third aims of Government noise policy to mitigate and minimise adverse effects on health and quality of life from noise and where possible contribute to improvements in health and quality of life from noise, and does not contribute to meeting the first aim, all within the context of Government policy on sustainable development. This is particularly the case for residents of Redbourn and Harpenden because the mitigation measures do not address the key causes of aircraft noise: number of aircraft departures and landings, number of different departure and landing routes, how steeply aircraft climb.
7. Noise Envelopes (Green Controlled Growth) exclude significant noise caused by slow climbing aircraft concentrated on the one westerly departure from Luton Airport. A 'Noise Envelope' and 'Noise contour area limits' should be set much wider than currently proposed to cover aircraft over the B487 and A108 so that action should be taken to ensure limits are not exceeded before any expansion takes place for both daytime and night time flights. In addition, the existing restrictions on aircraft movements during the night quota period should not be proposed to be maintained as in the Proposed Development to limit night-time aircraft noise but day and night time noise limits should be reduced to reduce noise levels and also expanded to cover a bigger area.
8. Concerns remain that there is a potential conflict of interest between Luton Borough Council as owner of the airport and previously the relevant planning authority for expansion proposals. As the airport's owner Luton Borough Council continues to receive significant revenue from the airport and indeed additional revenue for each additional flight. The Proposed Development will generate huge revenue for Luton Borough Council - this should be quantified and taken into account in this Proposed Development by assessing why previous proposals for expansion were approved and the operator was permitted to exceed the (far too high) planning constraints for flights and especially night time flights, particular concerns for residents.