

**Application for a DCO to expand Luton Airport – TR020001
Unique Reference 20040142**

St. Albans Quieter Skies

Written Representation on behalf of STAQS members

Introduction

St Albans Quieter Skies (STAQS) represents residents in North St Albans, Sandridge, Jersey Farm and Wheathampstead, who are impacted by aircraft flying Luton's most frequently flown departure route. We are members of the London Luton Airport Consultative Committee (LLACC) and its Noise and Track Sub Committee (NTSC). Historically, representation was driven by noise intrusion, but our residents are also increasingly concerned about climate change, pollution and long-term health consequences.

We strongly oppose the Luton Rising DCO application, in that it does nothing to resolve our existing concerns and we believe it will make the existing situation far worse. Substantial expansion of the Airport and its capacity would create such significant overall harms, that the claimed benefits will be outweighed by the environmental and social costs and further noise blight.

Flight paths to and from Luton Airport impact communities often many miles from the runway. The rapid increase in passenger numbers and flights between 2014 and 2019 has had a significant adverse impact on the residents that we represent. Although outside of the contour area that would automatically categorise us as "significantly affected", the repeated intrusive noise disturbance still impacts on the quality of life for our residents in what would otherwise be considered a quiet and tranquil environment. Sleep is regularly cut short by the 6 a.m. rush to depart the airport and maximise the length of the working day for the aircraft. The tranquillity of our gardens is lost from the roar from above. Conversations are put on hold. Even an evening watching television is blighted by noise interruptions.

Our main areas of concern relating to this Application are summarised below:

1 Policy and Guidance

We consider that the Application does not apply policy and guidance in a balanced way. We consider that the Application seeks to emphasise those areas of national policy that fit the agenda for expansion whilst ignoring the more general principles that expansion and noise mitigation should go hand-in-hand and seeks to completely ignore local democratic policy¹.

2 Good governance and operation

We do not consider that the impacts that would result from the Application are justified or reasonable in the context of good governance and operation.

We consider that between 2014 and 2019 LLA was not managed responsibly in the context of its permitted planning consent or in the spirit required by aviation policy. Expansion from 9mppa to 18mppa was agreed in 2013. This expansion was to cover a 15 year period based on gradual growth, sufficient to ensure aircraft fleet modernisation that would allow for noise reduction that would protect residential amenity².

The Airport Owner, the Airport Operator and the Local Authority entered a confidential agreement to incentivise growth and deliver the passenger limit by 2020. The noise contours designed to protect residential amenity were breached in three consecutive years – 2017, 2018 and 2019. The Local Authority failed to take any enforcement action and rather than taking action to comply with the noise contours, the Applicant applied for an increase in passenger numbers to 19mppa to effectively legitimise the breaches. This application has been called-in and a decision is still awaited.

Whilst taking all the benefits of incentivised growth and profit, the Applicant has failed to put into place the long term noise contour reduction strategy that should have been delivered in 2021 and has failed to deliver the promised fleet modernisation that would reduce noise under the existing planning permission. Additionally, it has failed to materially address noise mitigation more generally in terms of respite routes.

3 Noise impacts

We do not consider that the annoyance and disturbance caused by aircraft noise can adequately be measured by the choice of a single metric (L_{Aeq} contours) that this Application proposes.

People perceive noise in different ways such as length of noise event and frequency of overflight. There are also factors that are outwith the control of the airport, such as the distribution of the number of aircraft along particular routes that cannot be adequately dealt with by a one factor arrangement of an averaging of the day and night noise contours.

Out of date and inefficient airspace design means flights can be held low at 4,000 or 5,000ft for up to 20 miles. Departures on the Match Detling route make up 50%³ of westerly departures, which significantly affects the residents we represent. These flights may be held low for a considerable distance after take-off because of the proximity of the Northolt and Heathrow flightpaths and crowded airspace to the south of Luton.

Further expansion of the airport with increased flight numbers from larger aircraft will make this situation far worse. Arrivals and departures are taking place around every 90 seconds during peak flying times with early morning departures and late night arrivals and the proposed “busy day” timetable totalling 554 flights per day by 2043 is significantly more than the 2019 busiest day of 444 (corrected for unconsented movements). This would include aircraft larger than are currently flown and for which noise data is not available.

4 Noise mitigation

We do not believe that the Application sufficiently provides effective mitigation of the substantial noise impacts that will occur.

Mitigation is limited to noise insulation to those living closest to the ends of the runway and again based on the simplistic measure of LAeq. During a period of climate uncertainty, it is unrealistic to assume that during increasingly hot springs and summers that people will live indoors with their doors and windows closed.

The noise insulation scheme is effectively a limited form of noise compensation scheme that does not extend to consider the noise impact on those who live further from the airport and who are affected by overflights and who will suffer significant noise increases impacting health and quality of life for whom there will be no noise mitigation at all. It delivers a simplistic view that people will not want to use their garden or enjoy other outdoor spaces – something that we know from the impact of Covid 19 is important for mental health and wellbeing.

The Application has failed to assess the benefits of other forms of noise mitigation, such as respite routes for those overflown on the busiest routes. In 2015 a Noise Preference Route was put into place for the Match/Detling departure route – the busiest departure route at Luton Airport. This has caused significant noise intrusion for the predominantly rural and semi-rural communities that it overflies. Despite repeated requests by residents and their representatives for changes to the route and for respite - and despite being a recommendation within Aviation Policy⁴ where the narrowing of flightpaths should be accompanied by respite routes – respite and the potential for route changes are missing from this Application.

5 Noise modelling baseline measures

STAQS has concerns about the reliability of the noise modelling and the assumptions made.

In 2019 LLA was being operated for the third consecutive year in a non-consented manner. We do not consider that using non-consented baselines in calculating environmental impacts to be an appropriate baseline measure.

The Application includes an estimated 2019 noise baseline that has been modelled by substituting less noisy aircraft into the fleet which is an incorrect approach as it does not remove the unconsented excess movements.

Fleet modernisation has not been completed under the existing planning permission. The assumptions relating to noise are reliant on the modernisation and changes to the fleet of aircraft using the Airport. This is beyond the control of the airport and neither the fleet mix, nor the timescale for delivery can be relied upon. Whilst the main carrier at LLA, Wizz Air, has committed to making the whole of its fleet at Luton A321 neo by 2025⁵, noise monitoring reports have consistently shown that the A321 neo have not been performing as expected at LLA in terms of achieving the noise reductions expected.

Across our area – north St. Albans – the operators three most recent Community Noise Reports show that the A321neo is louder or as loud as the A321ceo that it supersedes, meaning that the expected noise reductions attributable to the new engine option aircraft are not being delivered.

6 Noise envelope

A Noise Envelope Design Group (NEDG) was formed and although not a member of the group, STAQs was invited to comment on some of the work undertaken.

STAQs detailed concerns about the sharing of the benefits of technological improvements, the need for independent and effective noise controls and enforcement and the need for improved standards of noise monitoring.

It is our understanding that work on this project remains unresolved, leaving a number of outstanding tasks. As a result we have significant concerns that our representations have not been considered in a fair and transparent way and that the noise envelope will not have an outcome that has actually been agreed in consultation with stakeholders.

References

- 1 Aviation Policy Framework 2013
ICAO Balanced Approach
Flightpath to the Future 2022
The DfT Overarching Aviation Noise Policy Statement 2023
Luton Borough Council website referencing the 2020 Climate Assembly, which concluded that growth in aviation capacity should be restricted to 25-50% by 2050.
- 2 A 1999 planning condition to protect residential amenity was carried forward into the existing DCO (approved in 2013). The consented 92-day summer noise contour limits for London Luton Airport (LLA) are that the 57dB LAeq (16 hour day) contour should not exceed 19.4 sq km and this is to be reduced to 15.2 sq km by 2028; the 48dB LAeq (8 hour night) contour should not exceed 37.2 sq km and this is to be reduced to 31.6 sq km by 2028.
- 3 LLA Sustainability Report 2022
- 4 Aviation Policy Framework 2013
- 5 Wizz Air Press Release 13 June 2023