

Unique Reference 20040142

St. Albans Quieter Skies

Deadline 8 submission - Comments on

TR020001-002827 – Recommended DCO Schedule

– on behalf of STAQS members

We wish to comment on the Examining Authorities schedule of recommended amendments to the draft DCO submitted to deadline 7, in particular those which relate to controls on airborne noise.

1 Noise Contours

1.1 We are pleased to see that the Planning Inspectors see the need to have a number of noise controls included within the DCO schedule.

1.2 We believe that the draft DCO should include all noise control limits – for example the night movement limit, currently omitted.

1.3 The noise contour limits proposed show that the future noise reductions projected under Project Curium 19M planning permission would **not be delivered**.

19M Planning Condition Noise Contour Limits – km²

	To end of 2027 (*)	2028-2031	2031 onwards
57dB LAeq DAY	21.1	15.5	15.1
48dB LAeq NIGHT	42.1	35.5	31.6

- - Only applicable after the LPA has approved the Operators strategy to reduce the contour areas to 15.5 km² (day) and 35.5 km² (night)

32M Planning Inspectors Requested Noise Contour Condition Limits – km²

	To end of 2028	2029 - 2033	2034 - 2038	2039 - 2043	2044 onwards
54dB LAeq DAY	30.6	28.8	28.8	32.6	32.6
48dB LAeq NIGHT	42.2	37.8	37.8	43.2	43.2

We are disappointed that the Noise Contours proposed replace an existing set of limits that were intended to restore the balance of benefits after a period of sustained rapid growth with an unmodernised aircraft fleet, with another containing no relief in sight. Accordingly, the public are left to consider that the airport is not operated in good faith and confidence in pledges of future noise relief are, again, severely dented.

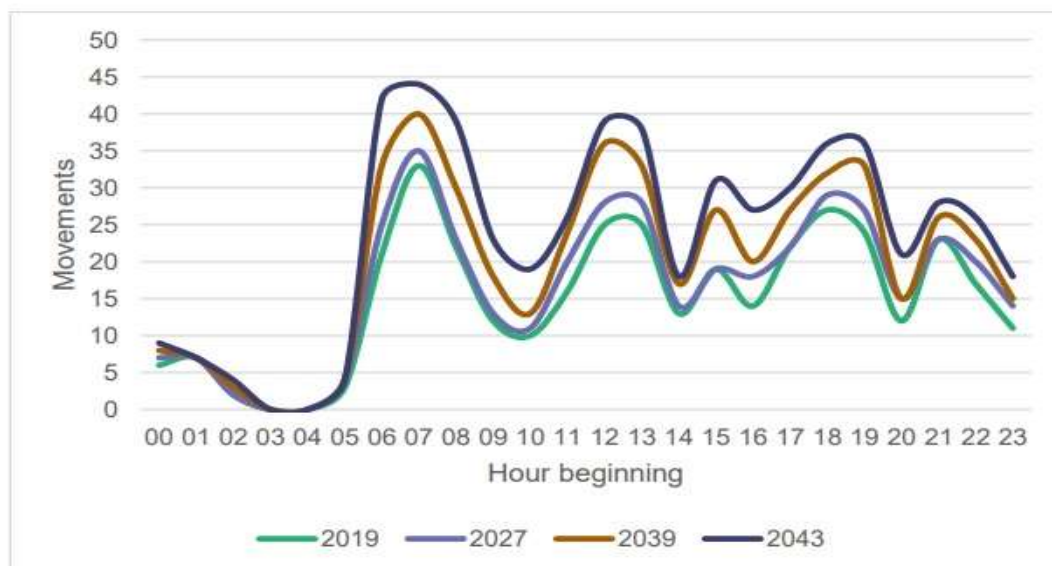
2 Movement Limit within the “Shoulder Period”

2.1 STAQS members are particularly alarmed by the proposed limit for the newly defined “shoulder period”.

2.2 Under existing planning conditions, this is known as the early morning shoulder period, and covers the one hour 06:00 to 07:00. The annual limit is 7000 movements.

2.3 The text proposed would now include the 30 minutes 23:00 to 23:30. It is not clear from the information provided how many movements typically fall within this period, but we estimate from the chart below these to be far fewer than those occurring in the morning shoulder period.

Figure 6.22: Profile of two-way scheduled aircraft movements on a busy day



2.4 We consider the limit of 13,000 movements to be too high – it is an unreasonable step change increase in a limit that is already controversial.

2.5 We contacted STAQS members to poll their view on the proposed definition of the shoulder period, and the limit.

Two points were consistently made:

2.5.1 The two time zones proposed fall within what they consider to be “night-time”. Disturbance to sleep is the number one issue for our members, a problem universally recognised at all airports that permit night operations.

2.5.2 This understanding of “night-time” is supported by the definition of the eight hour night contour period – 23:00 to 07:00.

2.6 **If** permission for the DCO were to be granted, this limit would apply from day one. The only protection would come from the night contour area limit.

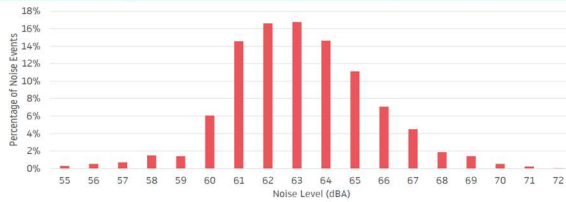
2.7 The overwhelming response from our members was that **any** increase in overflights during this period would be unacceptable. This is justified by the argument that the current limit was to run until 2028 – revised to 2031 with the 19M permission (should it be adopted). These are night flights and are not welcome.

2.8 As has been reported before, the workhorse of the fleet at Luton is the A321 and in this area the A321neo which is delivering (smaller than forecast) reductions to the noise contour area, but is not quieter than its older predecessor when overflying this area.

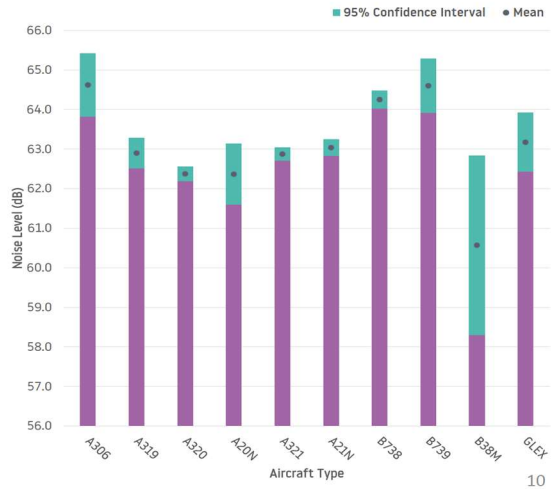
Noise Results

During the monitoring period, noise recording samples were gathered from the most popular aircraft types at London Luton Airport*. The summary of the noise results is shown in this section. The tables show the average noise by aircraft type and the bar chart shows the uncertainty caused by the spread in readings and the sample size (95% confidence interval).

Aircraft Type	Number of movements	Average Noise (dB)
A306	41	64.6
A319	101	62.9
A320 CEO	651	62.4
A20N (A320 NEO)	56	62.4
A321 CEO	710	62.9
A21N (A321 NEO)	467	63.0
B738	402	64.3
B739	33	64.6
B38M (B737 Max 8)	14	60.6
GLEX (Global Express)	37	63.2
All Aircraft Types	2,672	63.1



*The noise results shown in the analysis are only for those aircraft types that recorded more than 30 events per aircraft (B38M included for comparison).



Source: LLAOL Community Noise Report – St.Albans (Jersey Farm) June-September 2022.

<https://www.london-luton.co.uk/corporate/community/noise/community-noise-reports>

3 Conclusion

3.1 We welcome the Examining Authorities request to have noise controls “on the face of” the application.

3.2 We believe that this should apply for all noise conditions.

3.3 We are extremely concerned by the proposed increase in shoulder period ATM’s – which is seen as an intrusion upon the night period – the most sensitive time.

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23rd January 2024