

Unique Reference 20040142

St. Albans Quieter Skies

Deadline 11 submission

Closing Statement

– on behalf of STAQS members

We wish to make a closing statement to the ExA at the end of the Luton Airport Expansion DCO examination.

At our location, our members are overflowed by a concentrated flightpath used by approximately 50% of all westerly departures from Luton. Future aircraft orders of Lutons main carriers show how the workhorse of choice for the near and medium term future will be the A321neo. This aircraft type has failed to deliver the anticipated noise reductions at the fixed noise monitors – and at this location successive Community Noise Reports conducted by the Airport Operator have shown it to be no quieter – possibly louder - than its predecessor.

Under this flightpath there is no prospect of noise insulation provided by the Noise Insulation Scheme – but aircraft noise is a local issue and a source of annoyance to many.

In the absence of any noise reductions from future aircraft there remains only the prospect of airspace modernisation that might bring relief to a worsening situation. This remains as far away today as it was when STAQS was formed in 2017, and we were told by the operator that the then “long term” solution to our noise issues was airspace modernisation (FASI) – to be delivered by the mid 2020’s.

We note document 8.21 STATEMENT OF COMMON GROUND BETWEEN LONDON LUTON AIRPORT LIMITED (TRADING AS LUTON RISING) AND NATS (EN ROUTE) PLC

SOCG ID 3.1.2

Quote:

NERL recognises that airspace changes under FASI and LAMP will have an impact on traffic over London TMA. NERL is committed to the Government’s airspace modernisation initiatives. To echo the CAA’s representation, “On Airspace, it is still the case that it is too early in the Airspace Modernisation programme to say what trade-offs will be required to resolve any conflict between the sponsors of separate airspace changes, or between different objectives. Therefore, it is also too early to say what benefits individual airports might achieve from airspace modernisation, whilst recognising that one of the goals for the AMS7 is to provide greater capacity overall.” Whilst NERL has no principal areas of disagreement with the Proposed Development at this time, NERL cannot warrant or guarantee the output and timing of future and required airspace modernisation activities. Many factors and stakeholders interplay to deliver airspace change. As such, given the number of unknowns involved and their related dependencies, NERL cannot assess nor verify the feasibility of

the anticipated increase in aircraft movements from the Proposed Development in respect of future airspace changes at the present time.

End of quote.

We interpret this lukewarm submission to indicate that airspace modernisation is not going to happen in the near or even medium term, and if/when it does happen, it may not deliver all of the expected benefits (which in our case means the deconfliction of Luton flightpaths with flightpaths from other airports, often requiring Luton departures to fly for longer at lower altitudes than environmentally efficient routing would provide).

We are left to conclude that only constraining the number of overflight noise events will mitigate the increase in noise for this community.

In this respect, the Applicants proposed increases in movements give cause for anxiety - particularly the sought increases in movements during what they call the “shoulder period” – but which most would reasonably consider to still be a part of the night period, 23:00 to 07:00. The night period is without doubt the most sensitive to noise disturbance.

We are particularly concerned by the applicants wish to build noise limits around the “Updated Faster Growth” scenario and must question, if the forecasts made in the application are made in good faith, why this should be a consideration? This questioning becomes all the more relevant following the introduction of the Growth Incentive Scheme, agreed between the current Airport Operator, LLAL and Luton Borough Council within weeks of planning permission being granted for Project Curium at the beginning of 2014. This financially incentivised growth caused the breaching of noise contours in 2017, 2018 and 2019 and of course delivered the 18M ppa permitted capacity in 2019 rather than 2028. The possibility that these three again collude to target the Updated Faster Growth scenario is a concern.

We have followed the Examination keenly and stand in awe at the level of scrutiny and informed argument presented, but nothing has persuaded us that this project would do anything other than bring increased noise to this area, directly proportionate with aircraft movements.

If the ExA should be persuaded to recommend acceptance of a DCO to further expand Luton Airport, we respectfully request that any such order must contain bullet proof limits on noise and aircraft movements that would keep the development in line with *balanced* environmental limits.

Project Curium was intended to be balanced. Its delivery was not – the Airport owner and Operator took what they wanted – growth – and failed to deliver the balancing mitigations. This should not be allowed to happen again.

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8th February 2024