



National Infrastructure
The Planning Inspectorate
Temple Quay House
Bristol BS1 6PN

lutonairport@planninginspectorate.gov.uk

Your ref: TR020001

6 September 2024

Dear Sir/Madam

I am writing as an Interested Party invited to make comments in relation to the representations made to the previous consultation on 2 August 2024.

I am a resident of [REDACTED] and live within the area entitled to noise insulation grant. I am, therefore, very concerned about the impact of significant additional noise and environmental pollution that will accompany the proposed expansion of Luton Airport, requested in the DCO application.

I wish to briefly address the Applicant's response to the 2 August 2024 letter from the Secretary of State which requested updates and further information on a number of matters. This response was set out in a letter from Luton Rising to the Transport Infrastructure Unit, dated 19 August 2024.

1. Commencement of works on Wigmore Skate Park (Paragraph 2.3)

I am principally concerned about aircraft noise, its impact and proposed mitigation, but firstly I would like to provide additional information on Luton Rising's confirmation, in paragraph 2.3, that works commenced on the construction of a new skate park in Wigmore Park, prior to 29th June 2024.

I would question whether construction has commenced. I visited the site on 24 August 2024 and observed just temporary fencing around a grassed area containing a small metal storage unit and a pallet of bagged material.

There was no evidence of any construction activity, no equipment and the temporary fencing is a totally inadequate enclosure for a construction site.

Here are two pictures of the site, taken on 24 August 2024:



I am disappointed that this action appears to flout the Planning Process and demonstrates the conflict of interest that exists between Luton Borough Council's (LBC) role as a Planning authority and its ownership of Luton Rising. This conflict is an on going concern of local residents with respect to LBC's relationship with LLAOL and was highlighted during the DCO Examination.

2. Noise mitigation and compensation-night flights

I have comments on Section A2.4 in Appendix A

Luton Rising has made minimal concessions on night flights. The most significant noise mitigation would be to cease all night flights and bring Luton Airport into line with Heathrow and a growing number of international airports throughout Europe and elsewhere.

Despite having enhanced window insulation in my main bedroom, provided by LLAOL, we are still disturbed by both the number of night flights as well as excessive noise from QC2 rated aircraft and a long range Boeing 737 operated daily by El Al flying to Tel Aviv.

This is because of the limitations of the insulation provided and the need to open windows for ventilation in warmer months.

If night flights are permitted to continue, I would like to see the movement limit in A2.4.1 c a. significantly reduced, with a commensurate reduction in the Quota Count set out in b. I welcome the removal of QC2 aircraft during the night period, as set out in c.

I request that the controls also include a ban on the use of reverse thrust braking on landing, apart from deployment for operational safety requirements. I don't believe that this intrusive and noisy practice is included in noise modelling. It is a nightly occurrence and, I understand, employed by airlines to speed up turnaround times and, in effect, flout the established noise controls.

3. The Community Fund Section A3.3.13/14

The Community Fund is funded by LLAOL but controlled by LBC. Whilst it is true that the Fund is used to fund community projects in the local area, these are generally within the Luton conurbation and I am not aware of any significant funds allocated to Breachwood Green or other rural areas adjacent to the airport, in recent years. In any event, the minimum amount of £100,000 should be significantly increased to permit the allocation of funds to local communities like mine and provide a tangible form of mitigation to my community.

4. Noise insulation compensation policy A3.4.2/A3.4.16

I welcome the proposed enhancements to the noise insulation scheme but frankly the Applicant and LLAOL need to raise their game for these to be successful. At the present time, the number of properties insulated has been governed by a modest annual budget and scant information provided to local communities on eligible properties. There are

anomalies with the use of contour lines as grant boundaries, as they are not adjusted to include all adjacent properties in a road. I have details of such a property close to my own.

In addition, as far as I am aware, no insulation has been provided to any community buildings, such as village halls and schools in the eligible area in [REDACTED].

The pace of roll out has been poor, notwithstanding the impact of Covid, and certainly not matched by the significant expansion of the aircraft movements in recent years. The vaunted sharing of benefits from the use of modern quieter aircraft has not taken place.

This has led to cynicism in my local community, this maybe addressed in the measures set out in A3.4.4. However, I don't accept the conclusions of a3.4.5 that delays in completing the programme are due to homeowner inertia.

In summary, the expectation of the community is the introduction of a significantly enhanced provision of insulation, not just bedroom windows, and a fast track programme to catch up on the backlog that has developed in recent years.

5. Fixed position Community noise monitoring

One area that is not covered in the mitigation actions is reporting of actual noise disturbance. At present, the onus of reporting noise disturbance is placed on local communities, such as mine. This is generally carried out by using the Travis on line reporting system. Whilst this is a useful feature, most people are not prepared to devote time and effort on reporting repeated disturbance, particularly if little or nothing comes from the complaint. The relative lack of complaints from this community is not a measure of acceptance of current disturbance.

LLAOL deploy mobile monitors to Breachwood Green and other communities for short periods, the most recent deployment is considered below.

Noise monitoring in local communities should be enhanced by the installation of permanent noise monitors within local communities close to the airport. This will bring Luton into line with other large UK airports.

These will provide a more realistic picture of the impact of noise on people living in these communities rather than reliance on the fixed monitors located in open fields, on the flight paths but sparsely populated and on the temporary installation of mobile monitors in communities. The onus on reporting performance should fall squarely on the Applicant and be subject to appropriate independent scrutiny.

6. Community Noise Reports

A mobile monitor was placed in Breachwood Green during the first quarter of this year and a Community Noise Report has recently been posted on the LLAOL website. "Community Noise Report Breachwood Green January – April 2024"

As far as I am aware, this report has not been highlighted to the community and most people are unaware of its existence.

Unfortunately, the report is not certified as being subject to any external scrutiny and solely reflects the views of LLAOL. I note that the conclusions on page 16 are selective. They highlight that 42% of noise events were created by newer generation aircraft, with the implication that these are quieter than their older predecessors. The noise reduction of A320 NEO's compared to older A 320 CEO's is highlighted. However, the higher levels of noise from A321 NEO's compared to the older A321 CEO's particularly on take off, set out in the table on pages 12 and 14 is not mentioned. This is unfortunate as this plane accounts for the the second largest number of aircraft movements.

This A321 NEO's poor noise performance at Luton was highlighted during the Examination together with the negative impact on forecast noise reduction in the coming years.

The reporting process needs greater rigour and I have not detected that this will be provided by the Green Controlled Growth Framework referenced in A3.6 Paragraph 11.

Thank you for the opportunity to provide further comments.

Yours sincerely

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