

Unique Reference 20040142

St. Albans Quieter Skies

Application by London Luton Airport Limited Seeking Development Consent for the Proposed London Luton Airport Expansion

Consultation from the Secretary of State for the Department for Transport

St. Albans Quieter Skies is a community group formed by members impacted by the noise of aircraft flying Luton Airports most frequently flown departure route, across the northern side of St. Albans.

We therefore restrict our comment on this occasion to the request from the DfT for the applicant to provide further information on noise controls.

On 2nd August, you wrote to the applicant

“the Applicant is requested to provide suggested wording for a requirement which would secure noise contour limits on the face of the Development Consent Order. This requirement should be based on the core growth predictions in Tables 7.40, 7.43, 7.46, 7.49, 7.52 and 7.55 of Appendix 16.1 of the Environmental Statement Appendix 16.1 Noise and Vibration Information. The Applicant is also requested to provide amendments to the GCG Framework table 3.1 and Air Noise Management Plan (and any linked documents) to ensure compliance and support the monitoring and reporting with the proposed wording of the draft requirement to secure noise contour limits.”

On 19 August LR responded to this request in the form on an appendix attached to their responses to the SoS’s other questions., and we were invited to comment on that response.

We remain unconvinced that Green Controlled Growth is intended to be anything other than a soundbite to suggest that Luton Rising are a responsible and considerate developer.

The response majors on “mitigation”. There is no plan to “control”. With noise contours based on faster growth scenarios, Luton Rising should have total confidence in their ability to remain within limits. However, their total rejection of the notion of financial penalties outlined in A2.4.6 suggests that they do not have confidence that they will remain within those limits.

This situation is analogous to the position in 2013 when Luton Borough Council gave permission to the Airport Operator to expand to 18M passenger per annum, in a forecast growth leading up to 2028. This timescale reflected the introduction of “next generation” aircraft with their reduced noise footprint.

Within weeks of that permission being granted, Luton Borough Council, London Luton Airport Limited, and London Luton Airport Operations Limited, signed an agreement to incentivise growth at the expense of income from the airlines. (The Growth Incentive Scheme.) In response to the incentive scheme delivering accelerated growth, the area of the night noise contour was predicted to be exceeded, and indeed it was, in 2016, 2017 and 2018 and 2019. Only the Covid pandemic halted the breaches which Luton Borough Council, as LPA, were unwilling to enforce.

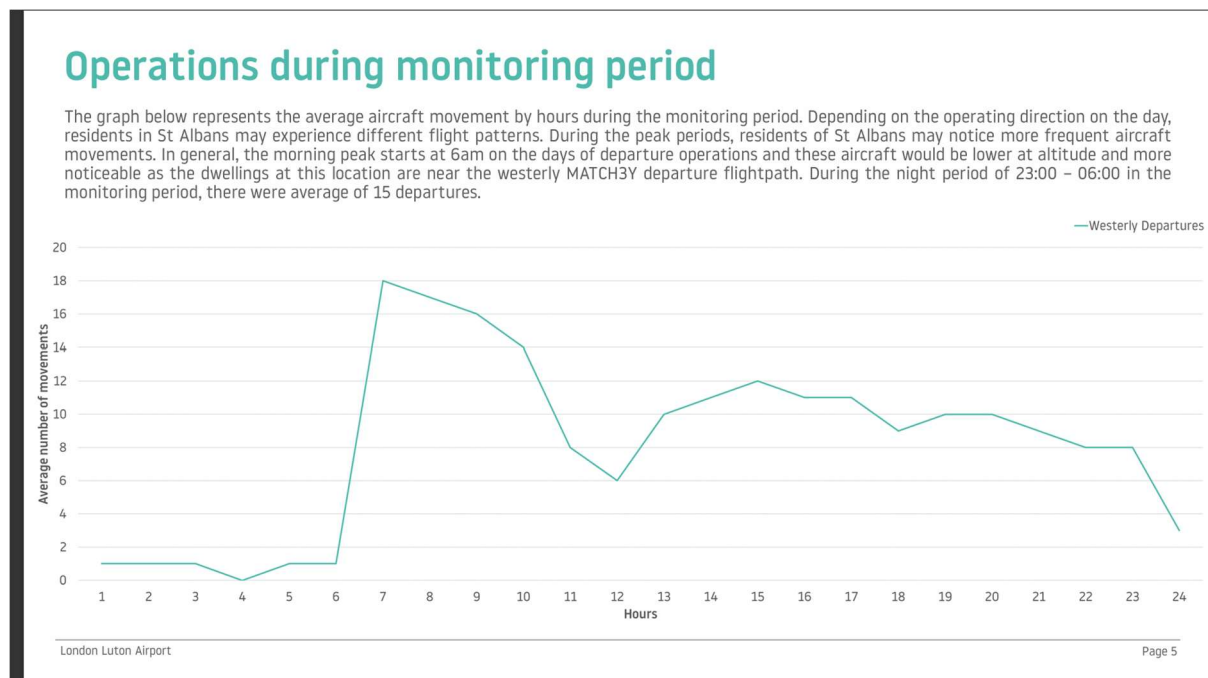
The reluctance to have noise contour limits on the face of a consent order, and the outright rejection of the proposal for financial penalties gives no confidence that the applicant has any intention of being constrained by noise controls.

The STAQS geographical area is outside of that which would qualify for mitigation measures in the form of noise insulation. But that does not mean that the flightpath over our heads is not a source of annoyance to many in the area. The Airport Operator has conducted regular noise monitoring in response to noise complaints from the area.

The most recent Community Monitoring Report has recently been published, using noise data collected during the summer of 2023.

<https://www.london-luton.co.uk/LondonLuton/files/2e/2e34bce6-8994-4509-9f8a-4f79eb1f8bd5.pdf>

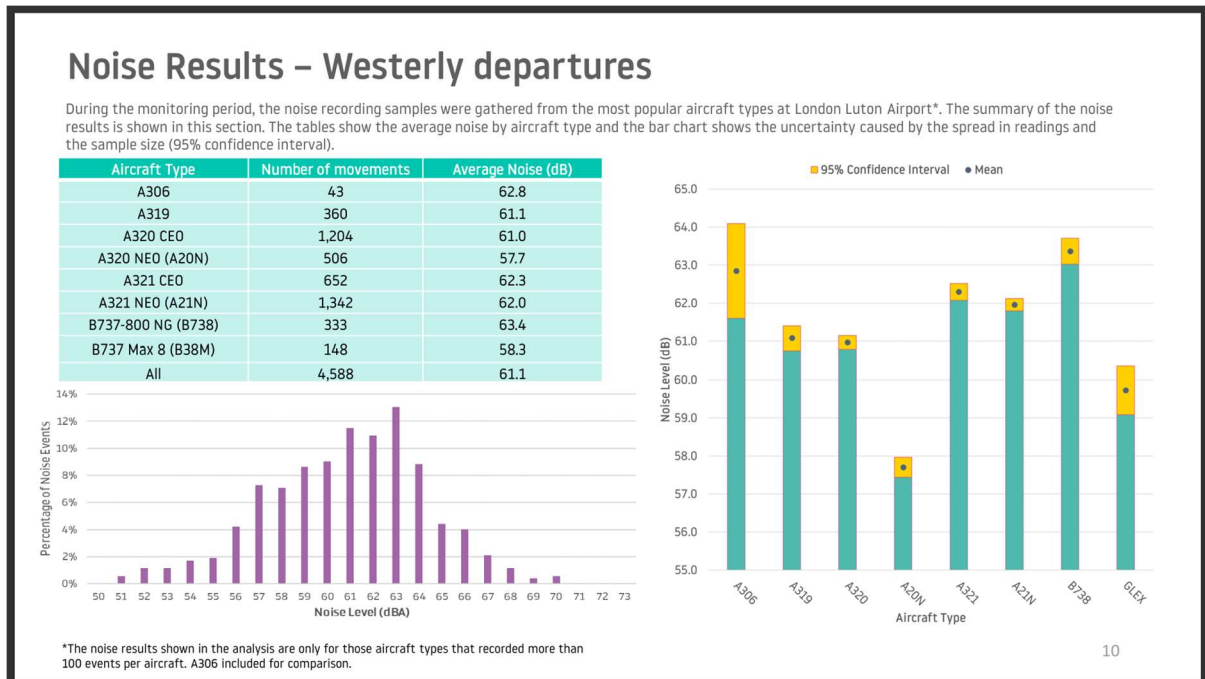
We wish to reference two slides from this report as evidence of the need for movement limits:



This graph shows the average daily flight numbers by time of day. It shows that the greatest number of flights occurred within the “early morning shoulder period” – 0600-0700am.

It also shows that the average number of night movements over the area was 15 per 24 hour period. Our members regularly report night noise and disturbed sleep as the greatest source of annoyance.

We offer these two statistics from this graph as evidence that movement limits, and especially night movement limits, are essential controls to protect health.



This second graph shows the number of overflights for each aircraft type, and the average noise registered for each flight. The airport operator has conducted noise monitoring at this location for a number of years, and the 2023 results are the first year in which the A321neo has recorded an average lower noise than the older A321ceo. Even so, the noise reduction is just 0.3dB – an imperceptible difference to the human ear. The A321, predominantly operated by Wizz Air, has rapidly replaced the A320 as the most frequently flown aircraft type.

Noise over this area is therefore perceived to be directly proportional to the number of aircraft movements. The “next generation” neo’s have offered no perceptible noise reduction at all.

We remain totally unconvinced that the applicant has any intention of being bound by movement limits and noise controls. Should the Secretary of State be minded to approve the application, we respectfully request that a full suite of movement constraints and contour area limits would be essential in this case where the applicant is also, to all intents and purposes, the owner of the airport and beneficiary of the profits generated.

St. Albans Quieter Skies

6th September 2024