

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

St. Albans Quieter Skies

RESPONSE TO THE OVERARCHING POLICY ON AVIATION NOISE

The preamble states that aviation noise policy needs to be updated, and guidance at this stage is required in advance of night noise abatement consultation and noise action plans. We strongly agree that noise policy needs to be updated. Current policies are ambiguous, but the “overarching policy” does little to address this.

The overarching policy states:

“The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise.”

We interpret this as being the continued support for the ICAO’s “balanced approach”, which is to share the benefits of technological improvements in aircraft and engine evolution in order to provide noise reductions to communities around airports, while at the same time permitting some growth in flight numbers.

The overarching policy goes on to say:

“An increase in total adverse effects may be offset by an increase in economic and consumer benefits in the context of sustainable growth and consumer benefits”

This does not provide clarification, as the term “sustainable growth” can be interpreted in alternative ways. It does not specify if those adverse effects refer to noise experienced by communities around airports, or consequences of climate change experienced by us all. To the aviation industry, sustainable growth is regularly used to suggest “continued growth”. To many others, it means growth at a rate our living environment can sustain, which would require limits and possibly reductions in CO2 production from the aviation sector, until such time as the industry can provide aircraft engines that do not rely on burning fossil fuels. Looking forward, growth in aviation at the rate we have seen in recent years is not sustainable if internationally agreed targets for net zero are to be achieved.

In the context of noise, St Albans Quieter Skies (STAQs) supports the ICAO Balanced Approach, in that technological improvements in aircraft and airspace design should be shared with communities, which in turn should permit expansion of aviation, so long as that expansion is genuinely sustainable, whilst delivering noise reductions to those communities overflown.

In the 2018 Green Paper, Aviation 2050, the Government consulted on a proposed new noise objective that would result “in a stronger and clearer aircraft noise framework which addresses the weakness in current policy and ensures industry is sufficiently incentivised to **reduce noise**”. The Executive Summary of that consultation paper included a statement that the paper “sets out a robust

policy framework to **reduce the harmful effects of aviation on the environment such as carbon emissions, air quality and noise**".

STAQs considers that the new overarching noise policy deviates substantially from "Aviation 2050" and that the overarching policy suggests a potential for weakening of the protection for communities affected by aircraft noise. The overarching policy statement itself is devalued by the fact that it has not been consulted upon – if it had been one presumes that the alternative interpretations would have been highlighted and the policy rewritten accordingly.

STAQs considers the wording used within the overarching policy to be ambiguous and the requirements to reduce noise "where possible" and mitigate noise "as much as is practicable and realistic to do so" are devoid of intent and open to interpretation. We have concerns that within the overarching policy the need to balance growth with noise reductions is not sufficiently emphasised.

STAQs believes that policy should be robust enough to inform planning decisions where growth is proposed. The balanced approach requires an airport by airport method of finding suitable solutions to local issues. We believe that this in itself requires a high level of trust that has to be based on clear policies with established and proven metrics that can be applied consistently to demonstrate key outcomes and this must start with the overarching policy.

Unfortunately, with Luton Airport we have recent experience of how the "balanced approach" can be exploited by airport owners and operators that set their own priorities and targets from within an envelope of planning conditions. In our written representation we will explain how the current set of conditions – permitting expansion to 18M in 2028 – were presented to communities as being balanced, but once approved the growth was incentivised in order to obtain a confidentially agreed target of 18M passengers by 2020, and before the balancing mitigations of quieter aircraft and airspace modernisation could be delivered. The consequences of this approach were foreseeable from the outset, were predicted by noise forecasts, but were ignored. We are now faced with an airport owner that seeks to reset their obligations to the balanced approach by abandoning their stated and overdue noise mitigations to the current expansion program, and have instead moved to seek a new set of noise and movement targets.

We have no doubt that the balanced approach methodology can work successfully but our own recent experience clearly demonstrates that even with local controls in place, the overarching policy must be more explicit in terms of its expected outcomes.