

Executive Summary of Written Representation by Michael Reddington

Unique Reference: 20037459

Note: I have recently become a member of the Noise Insulation Scheme Sub-Committee of the London Luton Airport Consultative Committee, although I submit this Written Representation Executive Summary in a personal capacity

1 Executive Summary

1.1 Objection

- 1.1.1 The Applicant is proposing within this DCO submission to increase throughput at London Luton Airport from 18 mppa to 32mppa between now and 2043 despite there being a climate emergency, national obligations to Net Zero, and the financial and environmental damage.
- 1.1.2 The Applicant is proposing to destroy a mature country park as part of the construction process.
- 1.1.3 As a long-term resident of Wigmore since 1994, I have seen the airport grow almost uncontrolled from some 1.9 million passengers per annum (mppa) to 18mppa in 2019, pre-Covid.
- 1.1.4 There is almost constant ground noise at night and during the day as well as the noise of arriving and departing aircraft. Our property backs onto a park which itself is in line with the north east end of the runway. We can see arriving and departing aircraft just after take-off and just before landing, when the noise it at its loudest.
- 1.1.5 We have to sleep in the front bedroom but visitors cannot use the back bedrooms because of night noise. Even so there is no respite in the front because a neighbour's house across the street is oriented at 90 degrees to ours, and airport noise bounces off the solid gable wall which is a perfect sound reflector.
- 1.1.6 We cannot relax in our garden because of the noise, especially on weekends when there appears to be no break at all.
- 1.1.7 I believe there is fuel 'dumping' due ot the acrid smell and taste of volatile compounds
- 1.1.8 There is widespread illegal parking on public roads, probably due to the high parking charges at the airport. Luton Borough Council's response is to start to implement residential parking permit schemes, i.e. residents now have to pay an added tax because of the airport's charges rather than LBC policing illegal parking using wardens, and hypothecating the fines.
- 1.1.9 Therefore I object to these DCO proposals unreservedly.

1.2 DCO Documentation

- 1.2.1 Despite all these major inconveniences set out above, we do not qualify for any sort of compensation such as insulation because of the criteria used by the Applicant.
- 1.2.2 The DCO consists of some 25,000 pages, a significant portion of which contains detailed technical data. It is almost impossible for a layperson to provide a comprehensive set of comments against the entire DCO.

- 1.2.3 Instead, the full text of the Written Representation confines itself to comments on noise mitigation through insulation.

1.3 Insulation Proposals

- 1.3.1 The Applicant's insulation proposals and eligibility criteria are not fit for purpose. They are lacking in detail, optimistic, incomplete, even contradictory, and do not meet the requirements of quoted DCO reference documentation.
- 1.3.2 As an example, the Applicant excludes Ground Noise from insulation eligibility criteria contrary to the Luton Local Plan.
- 1.3.3 There are no commitments to a prioritised programme of insulation works just a vague comment that there may be delays in getting insulation installed.
- 1.3.4 The insulation proposals rely heavily on dB LAeq T contours which are averages, and do not take account of the physiological and psychological effects of individual noise events particularly at night time.
- 1.3.5 The proposals do not consider internal noise levels within properties, their limits and testing methodology nor the treatment of 'legacy properties that have already had insulation.
- 1.3.6 It is my concern that this situation will not improve should the Applicant be successful in his current DCO submission (ref. performance under Project Curium, below) so I have put forward a suggested testing methodology in Section 6.

1.4 Comments on DCO Documents

- 1.4.1 The attached Written Representation provides comments upon, and a detailed cross reference to, the Applicant's documents and other relevant data sources:
- Section 2: AS080 (Chapter 16: Noise and Vibration Rev 1) Comments
 - Section 3: AS096 (Chapter 16.1 Noise and Vibration Information Rev 1) Comments
 - Section 4: Chapter 16.2 Operational Noise Management Plan Comments
 - Section 5: AS128 (Chapter 7.10 Compensation Policy and Measures Rev 2) Comments
 - Section 6: App 5.02 Appendix 5.3 Noise Requirements and Compliance CAP 1616A Comments
- 1.4.2 Section 7: CAP 1588:2018 "Aircraft Noise and Annoyance: Recent findings"
- 1.4.3 It is hoped that the ExA will ask the Applicant to provide a comprehensive proposal that responds to observations raised and provide full relevant details.

- 1.4.4 It is hoped that the ExA will ask the Applicant will take into consideration CAP 1588: "Aircraft Noise and Annoyance: Recent findings" (Ref. 6) which is summarised in Section 7 and provides guidance on how annoyance is measured and what actions could be taken to mitigate noise impacts.
- 1.5 App 5.02 Appendix 5.3 Noise Requirements and Compliance CAP 1616A**
- 1.5.1 The Government initiated the Independent Commission on Civil Aviation Noise (ICCAN) to provide best practice, in the mitigation of aircraft noise in properties. ICCAN produced a number of recommendations in their document "ICCAN review of airport noise insulation schemes March 2021" (Ref 7) but was then disbanded and subsumed into CAP 1616A which has not been updated.
- 1.5.2 It was expected that the Applicant would produce an insulation test programme as part of the DCO to back up the Compensation event of insulation provision. No such test programme has been forthcoming so the Applicant does not have a strategy to determine (a) what is being insulated; (b) whether the insulation is effective or (c) whether best practice is being followed.
- 1.6 Project Curium (doubling of passengers from 9mppa to 18mppa)**
- 1.6.1 The Applicant has so far failed to carry out the requisite testing on insulation provided as part of Project Curium, despite achieving the maximum 18mppa by 2019 with attendant noise increases.
- 1.6.2 An insulation programme should have had similar momentum to the increase in passenger numbers but there was no commensurate prioritisation.
- 1.6.3 It is acknowledged that long-term exposure to noise is damaging to health yet many residents of Luton have not had noise mitigation via insulation, even where eligible. Nor has a testing regime been carried out to confirm insulation efficacy.