

Unique Reference: 20040128 August 2023

Further to my initial submission, which forms part of this representation but is not repeated here, I would like to make the following additional points in support of my objection to this expansion.

References are to the non-technical environmental impact document unless otherwise stated. No comments on National Policy are intended.

Noise (chapter 16)

The proposed expansion will add to the noise disturbance I already suffer. It may ultimately be worse than the noise disturbance I experienced when living in Stevenage. But it isn't just me. A number of developments are underway for additional housing and sensitive developments directly under or very close to the main departure and arrival routes. For example, in Knebworth under the NHDC local plan, 200 new homes plus a possible secondary school will be built under the easterly Dover/Clacton/Detling departure path and a further 400 along with a new primary school under the easterly Compton departure path. Large housing developments in Bragbury End are close to the easterly Dover/Clacton/Detling departure path and other substantial housing developments to the east of Stevenage are under or close to the westerly arrivals path. There will be many such other developments throughout Hertfordshire, as it is hard to find a location which is not overflowed.

I do not find noise envelopes have offered me any meaningful protection either in Stevenage or in Knebworth. As previously stated, they are biased towards westerly operations and do not cover areas suffering noise pollution from easterly operations, which are considered low impact. The fact is that for many weeks of the year, often in the hottest weather, my property in Knebworth will be overflowed by a hundred banking planes per day at noise levels over 70dbA (as measured in our garden).

The panel should establish the true noise impact of the expansion upon areas under flightpaths, in particular those within ten miles of the airport and anyone else overflowed at under 5000 feet. In the event that any expansion is permitted, the panel should further establish what meaningful mitigations could be offered to these areas, which should include separate easterly and westerly noise envelopes for summer and winter operations.

In addition, I believe the modelling and weak data calibration understate the noise levels, particularly where aircraft are banking or manoeuvring onto a flight path. They also use simplistic assumptions, for example that aircraft fly on designated routes all the time.

After our response to the consultation for the 2005 Luton Masterplan, Luton Airport undertook some monitoring of westerly arrivals in April 2006 in Fairlands Valley Park in east Stevenage, where planes rise to join the glide path and drop their undercarriage. They made 17 observations, of which 8 planes had a maximum noise level of over 70 LAFmx with the noisiest at 78.9 (the plane was banking). We then asked the airport team to check four of the planes against their own noise monitor, which is about half way between Stevenage and the end of the runway. For the four readings examined in more detail, the readings over Stevenage were comparable to, or higher than, the readings for the same aircraft at the permanent monitoring station. This is not what one would expect from the noise contours and suggests that the noise contours do not accurately reflect what actually happens. The airport team was unable to provide an explanation. I note that calibration in Stevenage was undertaken on the west side where operations are easier to model.

Our experience was that if planes manoeuvre clumsily over this area then the maximum noise can exceed that much closer to the airport - and it is the maximum noise that wakes people up at night.

The supposed introduction of CDA in 2007 did not make a noticeable difference to the noise I experienced over the north and east of Stevenage from westerly arrivals. Measurements taken on our Stevenage property between 2005 and 2012 showed that some of these landing aircraft reached almost 80 decibels; on average they were about 65-70 decibels.

The panel should request independent noise monitoring at a broader spread of locations, including those likely to be difficult to model, to test the accuracy of the noise predictions.

The adverse impacts of noise upon health are well documented, particularly night noise (for example The WHO's 2018 Environmental Noise Guidelines). We are advised to get 7-8 hours good sleep but the (ineffective) mitigations proposed for night noise only cover 6.5 hours from 2330 to 0600. As Luton is a low-cost flight airport, the shoulder periods of 2230 to 2330 and 0600 to 0700 are amongst the busiest, with swathes of planes landing or taking off, when most people will still be trying to sleep. Damage to health does not start at 2330 or end at 0600.

The panel should establish the likely impacts of the expansion on noise levels during these night shoulder periods and what mitigations would prevent damage to health from noise.

Climate change and emissions

If Luton Airport is allowed to expand further this will have an adverse impact upon the UK's ability to meet its climate change commitments, so desperately needed to prevent further damage to our planet from climate change.

Since I submitted my initial comments, the UK Climate Change Committee (CCC) has issued its latest progress report on reducing emissions (2023 Progress Report to Parliament 28 June 2023 - 2023 PRP). This report confirms a loss of confidence in the UK meeting its medium term Net Zero targets.

One of 9 key messages is 'The need for a framework to manage airport capacity. There has been continued airport expansion in recent years, counter to our assessment that there should be no net airport expansion across the UK'.

This is supported by 2023 PRP Recommendation R2023-037:

'No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector GHG emissions and non-CO2 effects. A framework should be developed by DfT in cooperation with the Welsh, Scottish and Northern Irish Governments over the next 12 months and should be operational by the end of 2024. After a framework is developed, there should be no net airport expansion unless the carbon-intensity of aviation is outperforming the Government's emissions reduction pathway and can accommodate the additional demand.'

I agree with this approach. Piecemeal consideration of requests for expansion will result in busting both capacity and overall emissions targets. The CCC has computed that 'If all [current airport expansion] applications were approved, this would increase terminal passenger capacity by 97.4 million compared to 2018 levels, bringing total capacity to 467 million.' Gatwick and Heathrow expansions alone would add 71.6m. (2023 PRP Box 10.1 page 276)

Pending a proper framework, the panel needs to look at the case for Luton expansion in the context of overall demand around London and existing capacity. These airports are all serving similar catchments and, in many cases, serving similar destinations. From here it takes 30-40 minutes to Luton by car, 40-45 minutes to Stansted by car, 60 minutes to Heathrow by car, and 80-90 minutes to Heathrow or Gatwick by train. Many, if not most, Luton passengers come from

London and will have similar choices. How many more low cost flights from London to Tenerife or Mallorca do we need?

Expanding an airport when this will increase carbon and other emissions, with a high risk that mitigations will not be possible or effective, is highly irresponsible and should not be permitted. The CCC 2023 PRP questions many of the assumptions Luton Airport relies upon to mitigate its carbon emissions (which are still projected to increase by 89%). For example:

1. Luton Airport's assessment relies upon the development and availability of SAF (12.3.2b). However, the CCC states that '... risks remain unaddressed, particularly for securing SAF feedstock and SAF import supply, as well as planning for potential delays to nascent technology roll-out. The SAF mandate process is delayed, and insufficient policy has been brought forward to address demand management. The required emissions reduction for the Sixth Carbon Budget period [2033-2037] is therefore at significant risk' (2023 PRP Page 278 and Figure 10.9.)
2. Luton Airport's assessment relies upon the rollout (i.e. development and availability) of zero-emission aircraft to reduce emissions (12.3.2c). However, the CCC remains sceptical. 'The Jet Zero Strategy reconfirms that Government is aiming to have zero emission routes connecting the UK by 2030 but does not outline how Government will support the roll-out of zero-emission aircraft beyond 2030.' (2023 PRP page 280)
3. Luton Airport relies upon offsetting to deal with the balance of emissions (12.3.2a). Whilst acknowledging that this plays a role for aviation, the CCC comments that 'There has been no progress on offsets and removals policy specific to the aviation sector' (2023 PRP page 280), and further that 'reliance on offsets could slow progress to Net Zero' (2023 PRP page 355). The CCC advises that 'Airlines should ensure that their company-wide carbon offsetting schemes and voluntary schemes offered to consumers only invest in high-quality, long-lived offset schemes and provide regular, annual monitoring, reporting and verification on their use of offsets.' (2023 PRP Page 281). However the number of seat-kms flown by airlines associated with an offset was only 32% for the UK in 2022, falling to 29% for international flights (2023 PRP page 270).
4. The CC advises that 'Once available, airlines should use high quality, permanent GHG removals instead of offsetting schemes.' (2023 PRP Page 281). There is no mention of GHG removal in the non-technical summary.

The panel should examine in detail whether Luton Airport's claims and aspirations on reducing emissions are realistic and achievable and test its commitment to delivering them, given the immense challenges involved which are outside its control.

The panel should also establish what Luton Airport will do if it transpires that emissions cannot be reduced or offset by these means as it has assumed. In particular, is the airport prepared to reduce flights in order to reduce emissions?

Untrustworthiness

The airport operators and its owners Luton Borough Council (LBC) have not been prepared to abide by other supposedly binding planning decisions for the 2013 expansion when flights increased far faster than assumed, outstripping the potential mitigations.

For this expansion there is a proposed Green Controlled Growth Framework (document 7.08) based on preset thresholds overseen by an independent Environmental Scrutiny Group (ESG). In its Executive Summary this document states that

'If monitoring were to indicate at any point that a Limit was in danger of being breached, then plans must be produced by the airport operator to set out how that breach will be avoided, for approval by the ESG. If any one of the environmental Limits were breached **(unless for reasons outside the airport operator's control)**, further growth will be stopped, mitigation will need to be implemented if required, and ultimately, airport capacity would be constrained until environmental performance returned below the Limits' **(my emphasis)**

As many of the mitigations are outside the airport operator's control, this is worthless. If, for example, SAF is not possible at scale or new planes are not developed as predicted thresholds will be breached. Carbon dioxide will be pumped into the atmosphere and people's lives and their health will be blighted by excess noise but the airport will not have to do anything.

In addition, it is proposed in 7.08 Appendix A that LBC are represented on the ESG along with the airline industry but these are members with a financial interest in increasing flights, so not impartial. The ESG has an aviation expert but no expert in climate change, air pollution or noise; these experts are on the technical panels but not the decision-making body. Why not have a climate change expert on the ESG and an advisory aviation panel with the aviation expert and airline representative? The two county councils are represented but only NHDC at a district levels. There is no council representation from heavily overflowed areas such as Stevenage, Tring, St Albans or Harpenden; I do not see why NHDC has been chosen as the sole council; they should all be involved. The ESG appears stacked in favour of the airport operator.

The panel should examine whether the proposed Green Controlled Growth Framework and the ESG will offer effective protection against noise pollution, air pollution or climate change, in view of LBC's financial dependence upon dividends from the airport, its conflict of interest with its role as planning authority and the track record of non-enforcement. It should also examine how this structure could be adapted to give it balance and teeth.