

The question that actually matters in a democracy is how do the proposed changes impact CITIZENS, and how does the Planning Inspectorate safeguard the rights of UK citizens under law to enjoy peaceful rights to their private property and place of residence, in the face of private investors in Luton Airport intent on advancing their self-serving interest in maximising shareholders' returns at any cost.

Harpenden already suffers from the HIGHEST cumulative amount of aircraft noise - thanks to overhead flights from Luton westerly departures AND easterly departures AND arrivals... as well as most Stansted departures, and ALL easterly departures from Heathrow heading for North America or the rest of the UK. Unbelievable but true - check for yourself! Only once you have ADDED this up, are you starting with a correct statement of the CURRENT cumulative noise volume suffered by our community. Then you have a STARTING POINT on which to assess with any honesty or integrity the ADDITIONAL brutal impact of the proposed Luton expansion.

Add to this situation, the bureaucratic sclerosis that has infected UK airspace administrators, meaning that, for the last 5 years since Luton's frenetic exponential expansion began, there has been NO PROGRESS on tackling the compounded impact of the issues of: 1) inadequate take-off CLIMB RATES; 2) overhead THROTTLING as aircraft make sudden increases in speed and/or altitude 3-4 minutes into their departure; or 3) the noise "stiletto effect" that results from Luton departure routes following the SAME precise RNAV route and gouging out a motorway in the sky over our greenbelt community.

Neither have the airlines covered themselves in glory - with their exaggerated and empty spin about the imminent introduction of low noise aircraft!

Bim Afolami MP has been passed from pillar to post as he has tried to give a voice to his constituents' concerns - to pit their democratic public interests... against private investor interests - and tackle once and for all the menace of "fly tipping" of extreme aircraft noise from a Bedfordshire airport into its neighbouring Hertfordshire community. This is Social Contract close to breaking point.

It speaks volumes that some 1,600 citizens made the effort to exercise their democratic right to register their grave concerns with the Planning Inspectorate, with the vast majority expressing alarm at the noise situation, current as well as future. Like any dispute, the side led substantially by volunteers, following their convictions, tend to have the moral advantage over those intent purely on extracting private economic benefit and supported by hired professionals.

It is also a matter of great concern and disappointment that, at this stage in the process, registered citizens were only given 1 week's notice by email to make submissions, during high summer - presumably to the inherent benefit of the planning applicant.

I will provide more evidence and proof points when called to present.

For now, in summary, I think the common consensus (excepting those with private interests) would be that there can be NO further expansion of Luton Airport unless and until airspace management in the South East is fundamentally modernised, and the DoT, CAA, NATS and airports including Luton step up and collectively implement substantial and effective measures to categorically resolve the CURRENT noise crisis in Hertfordshire, before it would be appropriate to entertain even the thought of any expansion whatsoever of passenger or flight volumes.

Indeed, when I last spoke publicly in Harpenden about my concerns, I was approached individually by the Operations Director at Luton Airport, who assured me that it was also his conviction that the South East Airspace problem be addressed as a priority - so, private shareholder interests aside, we are not that far from a popular consensus on this sordid matter.

Stephen Pentland

## Tackling the airspace noise problem across Hertfordshire needs coordinated top-down government action, informed by the actual facts

1. The Secretary of State is to be commended for calling in this latest planning application from Luton Airport. The neighbouring communities have suffered the side-effects of aggressive expansion over the last 5 years, as a direct result of Luton Borough Council (LBC) in the past being able to decide unilaterally on the expansion of the airport, despite having a clear conflict of interest as an owner in the business. Planning decisions with such detrimental impacts on environment and neighbouring communities need to be handled with integrity, and calling in this decision is the only reliable way of ensuring this.
2. In discussing Luton Airport expansion, attention has been conveniently diverted away from the communities that suffer the most. It is all very well talking about airport “noise contours”, but looking at any map showing Bedfordshire and Hertfordshire county borders, and understanding that Luton flight departures all turn SOUTH from the airport, it should be immediately apparent that it is Hertfordshire that bears the brunt of the noise from planes taking off. For this very reason, MPs past and present, representing the constituency of Hitchin & Harpenden, have been vocal critics of Luton’s expansion plans from the outset, yet have been largely ignored to date. This enquiry creates an overdue opportunity for impacted communities to have their legitimate voice restored.
3. The broader question of whether LBC should be in the business of encouraging yet more extreme airport expansion needs to be considered very carefully, not least given the financial difficulties that have resulted in recent years as a result of LBC diverting council investment and management effort away from the council’s actual purpose of managing the provision of public services to its citizens, and into speculative and opportunistic airport expansion. To then have sought Covid bail out support from central government was confirmation, if any were needed, that the expansion ambitions were misplaced.
4. Looking forward, post-Covid, the global energy and consumer inflation crisis will be a double blow to the air travel industry. Flight costs will increase and discretionary personal expenditure will collapse, causing affordability and therefore flight volumes to fall in coming years.
5. In an effort to survive and protect its sunk investments, Luton’s strategy is to try to win share from its established rivals in the South East, and is therefore in a race to try to build airport capacity as fast as possible. But with businesses generally cutting back severely on air travel, whether for cost or ESG reasons, airport expansion is the opposite of what is now needed, and driven by purely selfish commercial and competitive considerations.
6. It must also be borne in mind that airport expansion is completely at odds with this Government’s climate priorities. Some airlines talk the talk about carbon offsetting, but the reality is that EVERY flight leaving or arriving at Luton burns fuel that directly results in tens of tonnes of additional CO2 being put into the atmosphere, time after time. The cumulative and irreversible environmental damage caused by Luton’s current flight volumes, let alone any proposed expansion, is truly terrifying.
7. Neither is there capacity in the airspace in the South East to support further flights, without further compounding the noise impact on neighbouring communities. Several years ago, **communities were promised that airspace in the South East would soon be modernised** (LAMP - the “London Airspace Modernisation Programme”) – flight routes would be untangled, planes would climb quickly on departure, green belt populations would be avoided, and together this would deliver a reduction in flight noise. **This has not happened**, and in fact I understand the CAA and NATS made no efforts to progress this plan during the 2 years of Covid either, despite there being no actual commercial flights during lock-down to distract them. The correct order of things is for this programme to be implemented BEFORE any further expansion plans are

considered, and the Government must give the CAA and NATS a clear mandate to make progress on this long outstanding priority.

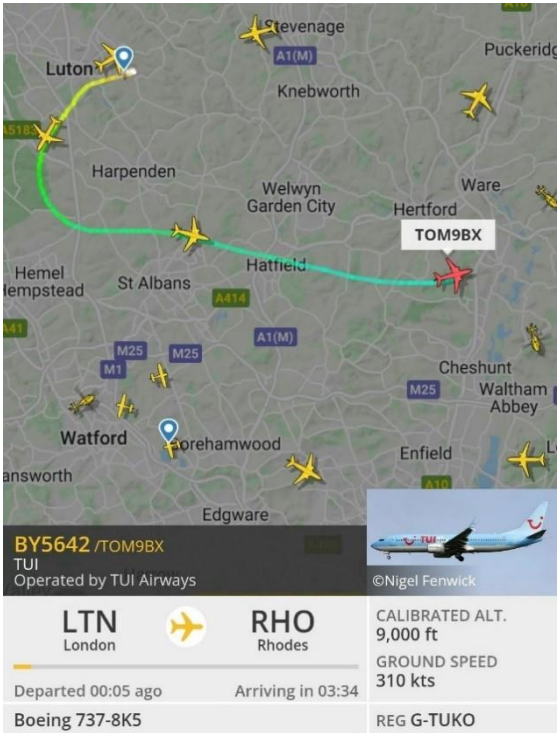
8. It simply isn't acceptable for the various UK public and pseudo-public bodies, airports and airlines - collectively responsible for airspace modernisation - to point fingers at each other and protest that **no organisation can make headway on its own**, least of all, those funded by taxpayers. Organisations need to be taken to task, once and for all, by the Transport Secretary.
9. In the meantime, the Government must also task the CAA, NATS and Luton Airport to attend to a number of critical areas that require **remedial attention**, and which collectively would **help reverse the noise impact on Hertfordshire communities** resulting from the aggressive expansion of Luton airport over the last 5 years.
10. Firstly, aside from airport "noise contours", there needs to be a proper understanding of the **total level of overhead flight noise suffered by communities in Hertfordshire** - which has come about through **uncoordinated and unmitigated expansion and routing of departure paths** from 1) Luton easterly departures, 2) Luton westerly departures, 3) Stansted departures and occasional arrivals, 4) Heathrow departures, 5) Luton arrivals and 6) occasionally London City arrivals and departures. **The cumulative noise impact is the SUM of all of these overflight routes and flight volumes, and must for once be actually calculated if we are to start with a correct definition of the problem.**
11. The introduction of **Radio Navigation (RNAV)**, originally intended to help relieve congestion and address noise, **has been poorly implemented**. All Luton departures now follow a **"motorway" over Hertfordshire green belt**, creating what Bim Afolami MP referred to in Parliament as the "stiletto effect" of tracks of concentrated noise on the impacted communities below.
12. The Transport Minister and Department need to task the **CAA and NATS urgently to develop a tactical plan to dispersing flights from all greater London airports and thereby reducing the sheer volume of flights that converge over the same area around Harpenden**. In particular, **Stansted and Heathrow departures and Luton arrivals** should be directed more consistently along the **alternative routes** that are available to them.
13. The impact of **Luton departures (both easterly and westerly)** on our community can be significantly reduced by **making it a priority that Luton departures CLIMB QUICKLY without interruption**, rather than levelling off after 20 seconds, as appears to be the current practice at Luton, presumably in an attempt to accommodate more departures within their overall noise budget). This would mean Luton departures **circling round Hertfordshire would already be at a much higher altitude**, and less noise pollution would be exported from Bedfordshire to Hertfordshire.
14. Luton departure flights also need to **correctly implement CAA guidance**, while over Hertfordshire, and **avoid unnecessary yet frequent engine throttling**, where planes fail to achieve **smooth changes in airspeed or rate of climb**, and the sudden engine throttling results in even higher levels of noise.
15. The radio navigation (R-NAV) system needs to start being used intelligently, to help reduce noise concentration by **dispersing departure routes more widely, and ensuring that communities are not impacted by from BOTH easterly AND westerly departures from Luton**.
16. Finally, Luton Airport and some of its airlines in past years had promised that **newer planes would reduce noise and emissions**. I'm only aware of one such "NEO" plane being operated from Luton by Easyjet. **Fulfilling this commitment should be a necessary prerequisite**, before any further expansion of the airport is even considered.

SUPPORTING EVIDENCE

Luton flight departures all turn SOUTH from the airport, so inevitably it is Hertfordshire that bears the brunt of the noise disturbance, and Hertfordshire communities whose voices matter.

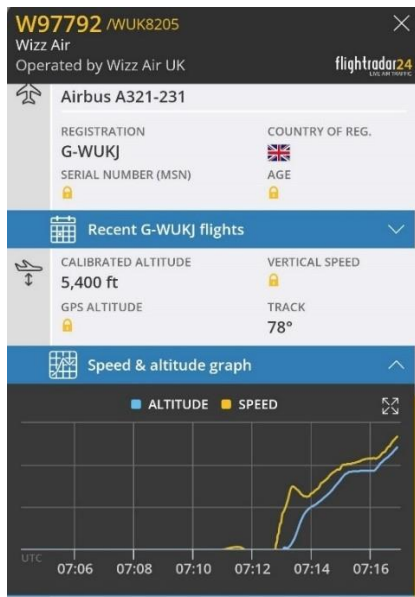


RNAV has been used to create a flightpath “motorway” over Hertfordshire greenbelt, now with many hundreds of departures every day, from before 6am until after 11pm.

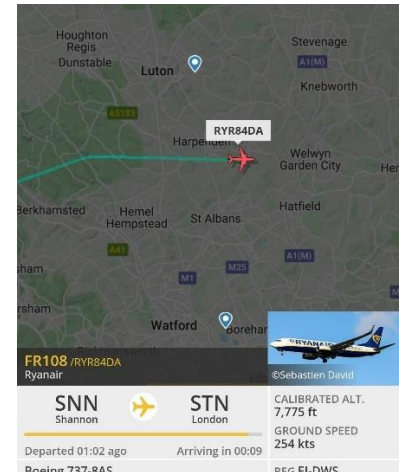
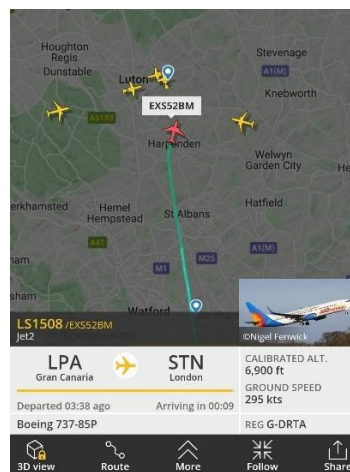




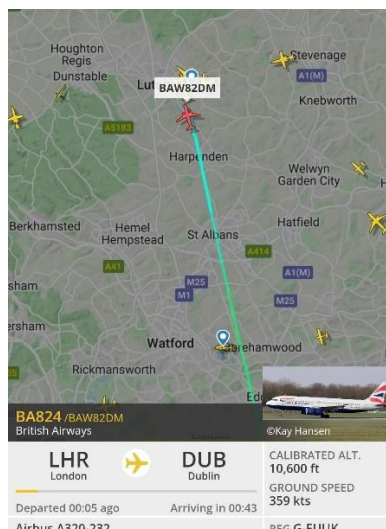
Throttling (to accelerate or increase rate of climb, or both) – the “kick” in the traces below – typically three minutes after take-off, exacerbate the noise problem for communities below.



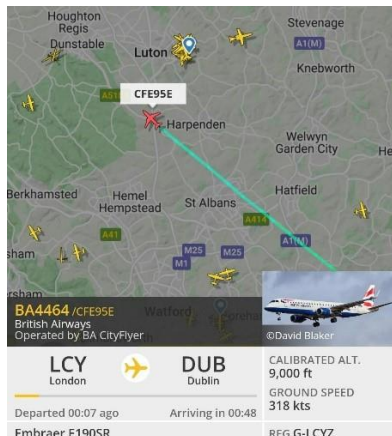
Stanstead departures and arrivals are commonly directed over Harpenden.



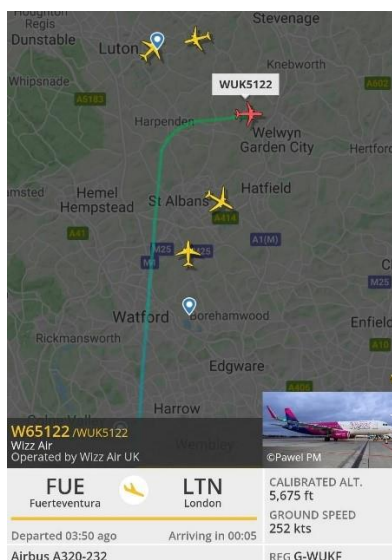
Heathrow departures are often directed over Harpenden, at which point planes are typically throttled to regain climb.



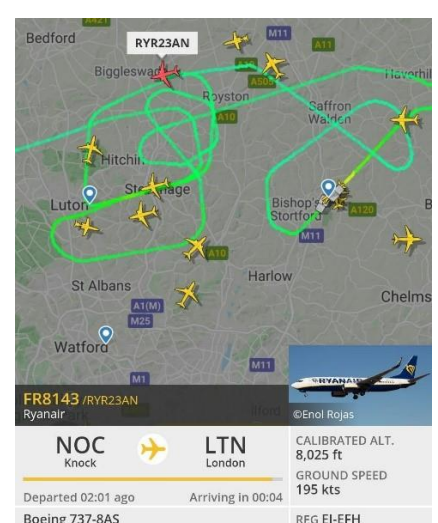
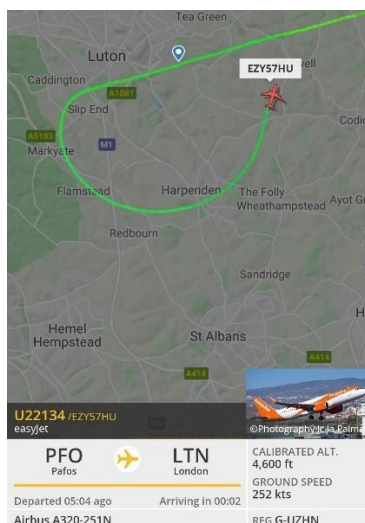
London City departures are directed over Harpenden.



Luton arrivals are directed over Harpenden, including after 11pm



Aborted Luton flight arrivals multiply flight volumes and noise, and on occasions highly the basic limits of the airport.



There are rare instances where flights are dispersed from their RNAV “motorway” routes – with considerate and intelligent deployment, RNAV could be part of the solution, rather than part of the problem.

