

**From:** [REDACTED]  
**To:** [Joanna Vincent](#)  
**Subject:** Luton Airport Inquiry  
**Date:** 18 August 2022 22:24:35

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Dear Ms Vincent

I strongly oppose this proposed expansion and do not believe additional passengers or a relaxation of the noise planning condition should be permitted.

My reasons and specific comments on the revised environmental impact statement are below. References are to Environmental Impact Assessment Volume 1: Non-Technical Summary of Environmental Statement Addendum July 2022.

## Noise

The airport is too noisy now in 2022. In addition to the swathes of departing planes, especially disturbing between 2230-1150 and 0550-0700, we are also noticing noise from arriving planes over nearby Stevenage. During the recent heatwave (11-16 August 2022) because of the easterly wind direction and excessive noise from departing planes, we had to keep all our windows closed at night and in the early morning. As the temperature inside the house was 25C plus, this made it very difficult to sleep and to ventilate the house with cooler air.

The projected level of noise in 2023 is therefore not an acceptable level to be used as any form of cap. We do not want another five years of this level of noise before a reduction is required to lower levels – which still exceed the 2028 cap in the original Condition 10. Breaches of current noise condition are forecast from 2023 onwards until 2031 (table 2.3). This means that, apart from the pandemic years, the noise caps – a supposedly legally binding commitment from the expansion – will have been systematically breached for 15 years. The proposals at 2.2.1 are wholly unacceptable and should be rejected in favour of the current Condition 10.

The table below shows the percentage increase in areas affected compared to the current condition. This demonstrates how the night noise levels, which are most damaging to health and wellbeing, are disproportionately badly affected under these proposals.

			% change to current cap	
	day	night	day	night
<b>current C10 cap</b>	<b>19.4</b>	<b>37.2</b>		
2019 actual	20.8	44	7%	18%
LA proposed C10 var	21.6	42.9	11%	15%
LBC proposed C10 var	21.1	42.1	9%	13%
2023 projection	21.1	42.1	9%	13%
2024 projection	20.4	41.9	5%	13%
2025 projection	19.4	39.8	0%	7%
<b>current C10 2028 cap</b>	<b>15.2</b>	<b>31.6</b>		
2028 projection	15.5	35.5	2%	12%
2031 projection	14.7	31.5	-3%	0%

Any agreements entered into (1.1.5) are worthless as this proposal breaks agreements entered into as conditions of the 2013 expansion. Neither Luton Airport nor its hopelessly compromised owner LBC can be trusted to keep to an agreement.

Promises of reductions in noise by 2028 are also meaningless, given that the airport has already begun consultation on a huge future expansion between 2025 to 2040 for 60% more flights with 70% more at night (Future Luton April 2022). Any supposedly temporary increases in allowed noise levels and other conditions will simply be banked and used as the new baseline for the next expansion.

The ability to achieve noise reduction is in any case outside the airport's control other than by reducing numbers of flights, which they are unwilling to do (see 3.2.8 where the breach is attributed solely to the fleet mix rather than the number of flights). The airport cannot control

the flightpaths taken and has only very limited influence on the aircraft used (2.1.1). Almost everything in this case depends upon the effective introduction of new 'quieter' planes. Nearly a decade after these were promised as part of the previous expansion, only 6% of flights use these. We have not noticed any difference in noise from the higher levels of quieter planes in 2022. As previously commented, some are actually noisier than their predecessors when used on Luton's short runway, so the introduction of more could increase the level of noise experienced. The introduction of larger planes (2.2.3 etc) will create more noise on take-off and particularly upon landing (due to the impact of air displacement).

The noise estimates in the statement are not based upon actual measurements but upon computer models with limited calibration. They also make simplistic assumptions, for example that aircraft fly on designated routes all the time. As a former senior modeller, I am highly sceptical about the assumptions and data which underpin the modelling used. A couple of examples from my own experience:

1. After the consultation for an earlier Luton Masterplan, we persuaded Luton Airport to do some monitoring of westerly arrivals in April 2006 in Fairlands Valley Park, Stevenage. They made 17 observations near Marriotts School and 8 of the 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 a sample of four of the planes against their own noise monitor, which is about half way between Stevenage and the end of the runway. To their surprise, 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 you would expect from the noise contours. Some fourteen years later we are still waiting for an explanation from the airport but we suspect that this is evidence that the modelled noise contours do not accurately reflect what is actually experienced on the ground.
2. There is a considerable difference in the level of noise from an aircraft directly overhead and one which is slightly to the side. For example, our measurements suggest that planes passing directly overhead are on average 6dB louder than those slightly offset. Friends in Sandridge who are disturbed by directly overflying planes were recently visited by members of the airport team who repeatedly assured them that no planes flew directly over their house. When, during the visit, the airport team observed planes directly overhead their only comment was that the planes were not supposed to be there - and yet they were. Again, no explanation has been forthcoming and our conclusion is that the airport do not really know where the planes are flying.

In addition, it states at 3.2.9 that the impact assessment is based on 2022 population and dwelling but there are extensive well documented plans for new house building under the flight paths as part of local plans in place or close to being finalised. There is already extensive house building in Stevenage under or close to the arrival and Clacton/Dover/Detling departure flight paths. Under the NHDC local plan, some 800 new homes will be built in and around Knebworth (an increase of 40%), all directly under or close to the Compton and Clacton/Dover/Detling departure flight paths. Forecasts should take account of current and planned future developments which will increase the impact of the proposed changes; it is lazy modelling to ignore this.

I disagree strongly with the assertions in sections 4.4 and 4.5 that the changes in noise levels are not significant, particularly at night time. The changes are all based on flawed modelling and do not accurately reflect the experience of those of us living close to the flight paths. A key driver which seems to be ignored is the number of flights. A single or rare loud noise is annoying but most people can live with it. Continually repeated noise events are a different matter, eventually becoming like Chinese water torture. There need to be less flights, not just quieter aircraft, and there should be a prolonged quiet period at night in which there are no flights.

The airport are still only talking about compensation in terms of insulation (4.5.5) but as climate change causes more heatwaves, our recent experience demonstrates that this also needs to include the installation and running costs of air conditioning.

The assessment of health impact at 4.5 does not include the impact on mental health of stress and anxiety due to sleep disturbance; it simply considers the rarer physical results.

### **Climate change**

It's disappointing that the airport continues to greenwash its environmentally damaging proposals.

We have just concluded our second heatwave caused by climate change. We are now in a period of drought. Evidence of damage is all around us. Local crops are severely impacted and food prices will undoubtedly rise at a time when there is already a cost-of-living crisis.

The CCC quoted here have clearly and repeatedly advised HM Government to severely limit further airport expansion, expressing concerns about the level of future emissions, even with technological advances. The report does not explain why it disagrees with this view.

The theoretical increase in emissions from airport expansion (4.3.9) is positioned as small and it is argued that Luton is no worse than other airports, but there needs to be a reduction in emissions. We need a completely different mindset to tackle climate change; one in which no increase is acceptable.

Holidays by air are nice but not essential, private jets even less so. Aviation is not essential for people's lives; affordable heating, food and energy are. If this application is allowed it will demonstrate that the UK government is not serious about climate change and send a clear message that it is not important. Our children and grandchildren will wonder how we could have been so stupid.

Please reject this application.

Elizabeth Graham

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