

APPLICATION BY LONDON LUTON AIRPORT OPERATIONS LTD

(REF APP/B0230/V/22/3296455)

VARIATION OF CONDITIONS RELATING TO EXTENSIONS AND ALTERATIONS TO THE  
AIRPORT LONDON LUTON AIRPORT, AIRPORT WAY, LUTON

**Statement by John Hale on behalf of St Albans Quieter Skies**

1. St Albans Quieter Skies (STAQS) was formed six years ago following the introduction of a new departure route (RNAV) and the approval for London Luton Airport to expand to 18 million passengers per annum.
2. Those events combined had a significant impact on the residents of Sandridge and north St Albans as they resulted in a material increase in the number of flights and consequent noise. The new RNAV route passes directly over Sandridge village and the nearby Jersey Farm area of St Albans. Prior to reaching those areas it impacts north St Albans. The increase in flights has also impacted nearby communities such as Wheathampstead.
3. The introduction of the RNAV route in September 2015 failed in its objective of reducing aircraft noise and exacerbated the issues resulting from the expansion of the airport.
4. Over the years, representatives of London Luton Airport Operations Limited have made a number of commitments to residents in St Albans, including in May 2017 at a meeting organised by St Albans District Council in order to understand the rapid increase in noise levels, when the then Operations Director said:
  - a. "find a way to climb these aircraft sooner"
  - b. "We will develop a new route to the west"
  - c. "We are looking to develop a respite route that we can use on different days of the week, different times of the day"
5. None of those commitments has been delivered and it is our expectation that should this application be approved none of the commitments that will I am sure be given in the coming weeks will be honoured.
6. At that meeting in 2017 and at other earlier meetings, the representatives of LLAOL should have known they were not able to deliver on those commitments. This has resulted in a serious issue of trust in what we are told will be delivered, and what will actually be delivered, at the airport.
7. Sandridge and St Albans are not only under the busiest departure route from LLA, but also under a London Heathrow departure route. The presence of that route, and the layered structure of airspace, puts a ceiling on how high flights from Luton can go. Until LHR agrees to moving that route or raising the ceiling it imposes, departures from Luton airport will continue at the current altitudes. I ask that the Inspectors consider this constraint when assessing any comments made at this enquiry about possible future changes to altitudes. The assumption should be that there will be no changes in routes and any conditions must be achievable without such changes.

8. At a recent meeting of the Noise and Track Sub-Committee of the London Luton Airport Consultative Committee it was reported that representatives of the Airspace Change Organising Group (ACOG) had stated that "The final delivery [of changes to flight paths] for London's eleven airports was not envisaged for several years, perhaps early 2030's"
9. This statement also applies to the commitments to find alternative routes and to introduce a respite route.
10. The airport's operator and owner know that they are restricted in what they can do by the rules governing use of airspace. For years the industry has been talking about FASI-S and modernising the airspace in this area, but have failed to make any meaningful progress to do so.
11. Noise is a significant issue with all airport expansions. When LLAOL were given permission to expand to 18mppa it was understood that this would occur over a period to 2028. Instead that limit was reached almost 10 years earlier as a result of aggressive expansion of the airport by the operator at the request of the owner. Immediately after planning permission was granted, Luton Borough Council, London Luton Airport Limited and the airport's operator entered into a contract to accelerate the expansion of the airport.
12. That contract is a flagrant abuse of the permission they had been given, which was based on an application to expand over the longer time period. The consultation material at that time and used again prior to the introduction of the RNAV flightpath, showed steady passenger growth up to 2028.
13. That permission also included conditions, the airport operator had accepted, to limit the noise impacts. Conditions they are now trying to get amended. The breach of the noise contour in 2017, resulting from the rapid expansion of the airport, was forecast, but nothing was done to prevent it.
14. It may be argued that the introduction of quieter aircraft has been slower than anticipated, but we would dispute any such assertion. When permission was granted to expand the airport, it was expected it would take 15 years for fleets to be replaced with quieter aircraft.
15. It is my expectation that any conditions imposed on the airport, should this application be approved, will be ignored in the same way as the previous conditions were. It is also my expectation that even if the application to expand to 19mppa is refused the airport will simply continue to expand in the knowledge that nothing will be done by the local planning authority should they breach the existing condition.
16. When the airport received permission to expand and then subsequently introduced the new departure route, we were told that the expansion would not be completed till 2028 and that changes would be made to the departure route to mitigate the impact it was having. This has not happened. Before any permission is given to further expand the airport the operator and owner of the airport should demonstrate that they can operate the airport in accordance with the current conditions.

John Hale

16 September 2022