

From Martin Routledge  
Chairman of the Consultative Committee



Navigation House  
Airport Way  
Luton  
Bedfordshire  
LU2 9LY

Mr Nick Barton  
Chief Executive Officer  
London Luton Airport Operations Limited  
Navigation House  
Airport Way  
Luton  
Bedfordshire  
LU2 9LY

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*Dear Nick*

## **LLACC REVIEW OF THE NOISE CONTROL SCHEME**

At the last NTSC in June Neil Thompson kindly agreed that the LLACC sub-committee could usefully review the Noise Control Scheme (NCS) stipulated by Condition 11a of the latest Airport Planning Consent. Some members of the NTSC duly gathered in early July thinking that they were conducting the review required at the one year point by Planning Condition 11e but it transpired that the Airport had already discharged that requirement with LBC so deliberations were cast more in terms of being the Airport's 'critical friend' rather than in assisting in the planning process *per se*. Nevertheless, I thought it would be useful to record the proceedings and put forward some recommendations for you to consider.

**Discharge of Condition 11e.** James Dontas briefed the Committee that the Airport's review under Condition 11e had concluded that the NCS was fit for purpose and did not require amendment; this analysis had been submitted to LBC to partially discharge the Condition. While the discharge of Conditions is clearly a matter between the Airport and the Planning Authority, the Committee felt that it would help their future deliberations if, in the spirit of transparency, a copy of the Airport's submission could be made available. It was hoped that the Committee would have the opportunity to engage formally in the next review of the NCS, due at the four year point, before that review is formally submitted to LBC.

**Variation of Condition 11i.** Inevitably, there was much debate about the variation of Condition 11i and its associated Noise Violation Limit (NVL) fining regime. Clearly the new Condition forms part of the NCS and thus was considered in scope for debate. Some members commented that they had supported the variation believing the original to be overly complicated and not likely to deliver the effect required as it did nothing to incentivise the use of the quietest aircraft. However, it was also noted that the NVL fines had been reduced under the original Condition 11i because many more flights were likely to exceed the limits. The overwhelming view around the table was that, as the Condition had been adjusted and

fewer aircraft would now be exceeding the new limits, fines should be re-instated at least to 2014 levels in order to achieve the aim of incentivising quieter aircraft. It was noted that this had been the advice given to LBC by their experts (Cole Jarman Ltd) and to Hertfordshire County Council by AECON; on balance the Committee agreed. Therefore, it was recommended that LLAOL should look to implement a more appropriate fining regime not only to reinforce the incentive to use quieter aircraft but also as a goodwill gesture to the local communities.

**Noise Quota System.** On the whole the Committee felt the noise quota system was working well. They were informed that Government (presumably the DfT) were consulting on changes to the system for the designated airports and on the whole it was agreed that Luton should fall in line with any changes. That said, a change to the system would also mean a concomitant change to the Quota Count Budget so in the end this initiative should be self-balancing.

**Phase Out of QC2 Aircraft.** It was noted that the NCS called for a phasing out of QC2 aircraft but it set no timescale for this to be achieved. The Committee were not in a position to suggest a realistic deadline but felt that the NCS should set a reasonable challenge in this respect. LLAOL are encouraged to make this voluntary adjustment to the NCS. The Committee went on to discuss the current operation of a Boeing 737-200 from Luton; the aircraft is often described as being 'marginally compliant' and the Committee urge you to ban it from operating from Luton as soon as possible. It had been noted that this aircraft attracted considerable numbers of noise complaints and it is believed the type is banned elsewhere. Again, voluntarily removing this aircraft from the noise footprint at Luton would be seen to give real substance to the Airport's aim of being seen as a good neighbour.

**Condition 13 - Monitoring.** The Sub-committee took the opportunity to look at the noise monitoring scheme which also required review. Overall the monitoring, including mobile monitoring, seemed to be working quite well although it was noted that some technical difficulties had been experienced with one of the fixed monitors which had led to a slight reduction in confidence that the impact on the ground was being accurately recorded. The Committee have previously stated their view that more mobile monitoring along the departure routes should be undertaken to build an even more accurate picture of the lived experience of aircraft noise as this would help inform airspace changes. Therefore, they were pleased to note the Airport is investing in more mobile monitoring equipment. Discussions on Monitoring inevitably brought in to question the fining regime for those that exceed the stipulated limits. While the Committee felt that a return to 2014 levels was a must under the revised Condition 11i there was also discussion of the potential to introduce flat rate fines (rather than percentages of landing fees) at a meaningful rate, on a sliding scale by noise with additional penalties for repeat offenders. Again, it was felt such a development would further incentivise the use of the quietest aircraft and provide tangible evidence of being as good a neighbour as possible.

**Condition 14 - Ground Noise.** There seemed to have been very little reported impact from ground noise at the Airport; although it was noted at the LLACC that your staff would look again at reports of a near constant hum at Breachwood Green. The in-place scheme seemed to be fit for purpose but as in all these schemes it will need constant monitoring.

**Additional Issues.** In closing our discussions there were comments that single event noise violations at the fixed monitors were not really a good measure of the environmental noise experienced along the departure and arrival tracks. For many the absolute noise level wasn't so much the issue rather it was the constant flow of overflying traffic. Of course the noise contour system is designed to give a more generic view of the noise footprint and the Committee await with interest the results of the noise contours for the busy summer season. Suggestions linked to this view of constant disturbance inevitably led back to arguments of

concentration over dispersion; alternative routing to give what some call concentrated dispersion; and respite periods. It was felt all of these ideas were worthy of further debate when looking at airspace changes, the revision of the Noise Action Plan and of course the next formal review of the NCS.

**Conclusion.** The NTSC were grateful for the opportunity to engage with LLAOL on the NCS and other Planning Conditions and hope the comments above will be taken in the spirit of 'critical friends' as intended. It was felt there were some relatively simple measures in the Airport's gift that could bring real benefit quickly to the local communities and the Committee look forward to working with your staff to the benefit of all.

Kind regards

*Martin Routledge*