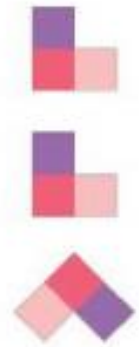


Mr D Gurtler  
Planning Department  
Luton Borough Council, Town Hall  
Luton  
LU1 2BQ

4<sup>th</sup> January 2021



Dear David,

I am writing to you today regarding LLAOL's Noise Contour Reduction Strategy (NCRS) application 20/00131/DOC.

With respect to the comments raised by you and Cole Jarman in your email dated 1<sup>st</sup> October 2020 hopefully the information here will provide greater clarity in order to assess the application.

### **3.2 Quieter Aircraft**

We are currently reviewing the various ways in which UK airports apply differential charging to understand which method would be most effective in encouraging the use of more modern aircraft at LLA with the intention of introducing the charge effective 1st April 2022, any new scheme will also have to be compatible with the slot allocation process described below.

Any new airline agreements have incentives built in at the point of signing which require a percentage of flights to be operated by more modern aircraft.

### **3.3 Airspace Modernisation**

Whilst Airspace Change does not form the main plank of the NCRS it is one element of the strategy that will aid in the overall reduction of the noise experienced in the vicinity of the airport.

We have already set out in our letter on the 3<sup>rd</sup> July 2020 that this is not a NATS programme but the southern aspect of a National programme to modernise UK airspace and NATS and Airport Operators are collaborating on this.

The CAA are ultimately responsible for approving any airspace change LLAOL would not be party to any airspace change proposal that would make the situation worse for our local community and in any case the legislative framework for assessing airspace change would not allow this unless it was to resolve a significant safety risk.

Airports have committed to collaborate on the airspace design and whilst there may be cases where airports may not be able to achieve their *optimum* solutions due to interactions with other airports, it is simply not realistic to say that noise benefits will not arise from the airspace modernisation programme when it is one of the fundamental objectives that the changes will be assessed against.

One aspect of policy information which forms part of the legislative framework for assessing Airspace Changes is the Air Navigation Guidance 2017 which states in para 3.3 Altitude Base Priorities that;

*"where options for route design from the ground to below 4,000 feet are similar in terms of the number of people affected by total adverse noise effects, preference should be given to that option which is most consistent with existing published airspace arrangements;"*

Essentially any environmental benefits need to be of a magnitude that it makes a difference to be deemed successful therefore Cole Jarman's point about the default position being *any changes will not make the situation worse* is correct to a degree however as mentioned above LLAOL would only put forward airspace changes that would make improvements on the current situation.

Airspace improvements were not factored into the contour assessment and forms one part of the strategy to aid the overall reduction of the noise contours but is not dependent on it.

### **3.4 Minimise Unscheduled Flights**

We already have in place a ban on unscheduled night-time movements (ad hoc flights) what we do not have is a ban on off-schedule operations and this would be quite difficult to apply in practice.

Following the breach of the night noise contour in 2017 an action plan was submitted to the council detailing the actions taken in direct response to the breach. This action plan was then communicated to the airlines via the coordination committee in the form of amendments to the local rules for slot coordination.

In the latest communication the importance of adhering to scheduled operation times was reiterated and if significant off-schedule operations continued then we may need to introduce a night-time curfew. A night-time curfew would have significant implications on the entire airport community and its wider supply chain including employment.

We do not feel it is necessary to amend the wording to anything other than 'if necessary' at this time. The strategy has review mechanisms in place and if at any point we feel it is necessary to introduce such a measure then we will do so at the right time.

At present we feel the best way to address this is through open communication channels with the airline customers and continue to monitor performance and address issues when they arise. A night-time curfew will be used as a last resort when all other avenues have been exhausted.

### 3.6 On-going Review

Each year we are required to report on the annual 92 summer contours as part of the planning conditions. This report contains detail on the methodology used to calculate the contours and the contour validation process as well as a comparison against the previous year's contours.

Whilst we appreciate the information from Cole Jarman on incentives to adopt operating procedures at present it is not possible for LLAOL to monitor and determine which procedures are being used other than by the airline operators volunteering the information.

Whilst the noise and track monitoring system can give some indication based on the flight profile, we will not understand the details of the procedure flown as we are not privy to that information on a flight by flight basis.

We have committed to conduct a review of the operational procedures used and identify areas where improvements can be made in order to minimise noise on both departure and arrival.

On the point of Noise Abatement Departure Procedures in particular, our Environmental Noise Directive (END) Noise Action Plan 2019-2023 contains an action on page 24 **Section 1: Operational Procedures** action 1.5 which states;

1.5	Undertake a review of Noise Abatement Departure Procedures used at London Luton Airport to evaluate their effectiveness and work with our airline partners to identify and implement improvements.	Departure Noise	2019	Evidence of the review.	Residents within 55dB L <sub>night</sub>	To assess the effectiveness and establish targets for noise reduction.
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Our intention was to undertake this review in 2019 however this was delayed until 2020 and as a result of the COVID-19 pandemic delayed until 2021. We understand that a clear timetable and methodology for the review may be preferable at this stage however we feel that the correct approach to establishing the objectives and methodology for the review is through engagement with the relevant technical and community stakeholders; our Flight Ops Safety Committee and our Noise and Track Sub-Committee to ensure that we seek to understand what the outcomes should be to strike the right balance for all parties involved.

### Slot Application Process

Comments were made by Cole Jarman requesting that we set out why the slot application process cannot be used to allocate slots preferential to modernised aircraft.

The IATA World Slot Guidelines represents the globally accepted best practice and ensures that slots around the world are independently allocated to airlines using consistent policies, principles and processes.

The prime objective of airport slot coordination is to ensure that the most efficient declaration, allocation and use of available airport capacity in order to optimize benefits to consumers taking into account airports and airlines. These are broken down into 7 key objectives and the one in particular which restricts us from allocating favourably to one airline over another

- To ensure that slots are allocated at congested airports in an open, fair, transparent and non-discriminatory manner by a slot coordinator acting independently.

Airlines that hold existing historic rights to slots they have operated in the past relate to an airline, aircraft type, time and route. Airlines are under no obligations to change these as they hold historic rights nor are there any provisions within the world slot guidelines that allow an airport to force an airline to change this even through control measures however there are mechanisms that would allow us to apply environmental aspects to coordination of any new slot applications namely by ring-fencing a portion of available quota point capacity to be used for new slot applications and thus be able to coordinate the best use of this available capacity taking into account the environmental efficiencies of an aircraft.

The above strategy will form part of a local rule which will be put forward to the coordination committee at the next coordination meeting for implementation from Winter 2021/22. It is not possible to introduce this sooner as the coordination process for summer 2021 has already begun.

We are now working on a new version of the Noise Contour Reduction Strategy, to include some clarity on the actions mentioned above. We will submit the completed strategy to Luton Borough Council in the near future.

Yours sincerely

A black rectangular box used to redact the signature of Neil Thompson.

Neil Thompson  
Operations Director