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22nd January 2024

To: The Planning Inspectorate,

Topic: London Luton Airport (LLA) Expansion Examination TR020001 - Concerns raised by Bourn residents

I write as chair of Bourn Parish Council to represent the interests of our community in the context of the expansion proposals outlined in TR020001.

While many aspects of airline industry expansion raise concerns due to its negative environmental and social impact, I wish to focus Inspector's Attention specifically on local fears related to the proposal to increase the number of LLA aircraft movements, particularly in late night and early morning time slots – and the Parish context that gives rise to these concerns.

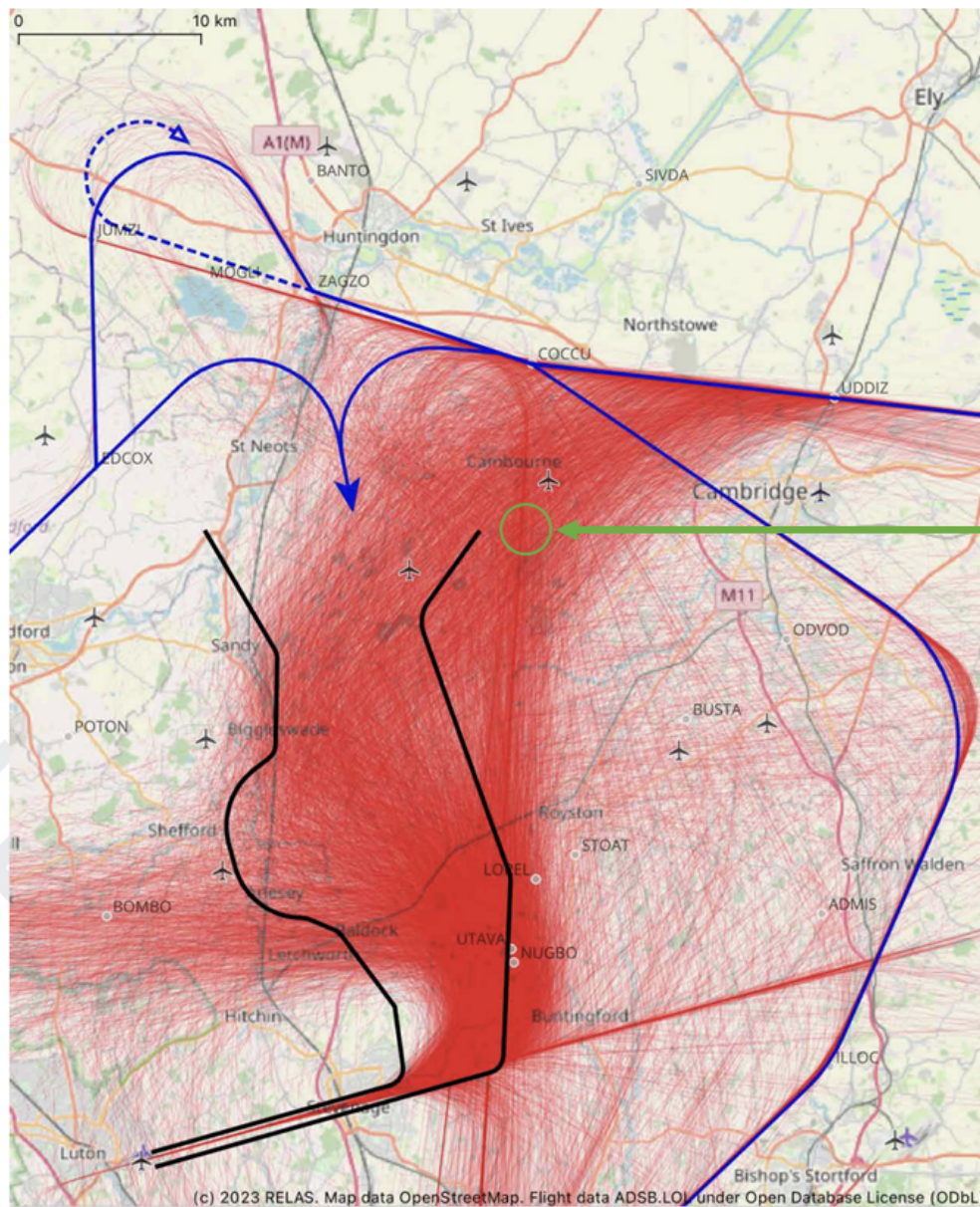
Background and context to Bourn's concerns

Bourn Parish Council has been serially unconsulted during a number of LLA expansion initiatives over recent years; most notably the Parish Council was not identified as a key stakeholder during the AD6 consultation process. This may have been because, like many towns and villages in the surrounding area, under the written proposals Bourn appeared to be outside of the proposed Standard Approach 'funnel' and considered unlikely to experience aircraft descending directly overhead.

However, the 'lived reality' since implementation of AD6 is that a significant proportion of aircraft approaching Luton through the UDDIZ waypoint are being routed early, shortcutting the designated funnel and never reaching the COCCU or ZAGZU waypoints.

Aircraft are even being routed due North through the NUGBO waypoint - creating a double disturbance to our community, as aircraft approach from the south, and [through a nuance of our Parish location], typically loop overhead, returning seconds later, for the final approach).

The scale of these short-cut movements is explicitly shown in the below diagram, which is a data capture gathered by community group [RELAS.uk](https://www.relas.uk), July 2023. This data was submitted to the CAA, and is currently under Post-Implementation Review.



Bourn

Westerly Runway Arrivals July 2023 (No General Aviation, Only Category A2 & A3)

As example of insight gained during data capture activities last summer – and explaining why Bourn is experiencing such high density of overhead traffic, and related noise;

- For traffic arriving from the east and landing on runway 25 (the most common case, due to prevailing winds) less than 5% follow the complete route to the end of the Standard Approach, as proposed.
- Between April and September 2023, 67% of traffic was found to have taken shortcuts, instead of the predicted 30%.

Why shortcuts are a noise problem for Bourn

I wish to make the Inspectorate aware that the noise, social and environmental impact of Luton Airport stretches far beyond the areas shown on the contour maps.

The critical point about real-world AD6 practices, and the routine short-cutting, is that a shorter distance to travel means less approach distance to lose height, and therefore descents are steeper. Descents are clearly departing from the recommended NATS 1000ft/3nm guidance, and as a byproduct, Bourn residents are experiencing increased noise from;

- **Routine use of speed brakes** to enable aircraft to descend quickly – one of the greatest causes of noise complaints by residents in outlying villages. (Use of speed-brakes is generally considered poor aviation industry practice, due to the negative, highly audible side-effects. Regular use of them raises concerns about the AD6 design, ATC approach practices, and wider regard for communities living below).
- **The 8,000ft base in the Parish area being broken**, with aircraft periodically being shown to be descending prematurely below this altitude.
- **Excessive approach speed**; aircraft have been shown to routinely exceed the recommended 220kts, by some margin – with due increase on noise experienced at ground level.

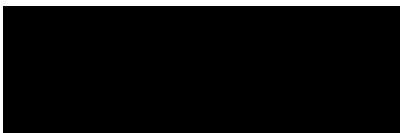
Conclusion: Rejection of proposals to extend flight movements and antisocial operating hours

The scale and location of the real-world AD6 aircraft movements, and the resulting negative side-effects that short-cuts and associated noise-generating practices have on Bourn Parish were never outlined in the AD6 consultation documentation.

In this context, any proposals to increase the number of aircraft movements, especially at antisocial times, or to extend the noise shoulders from 23:00 to 23:30, and between 06:00 and 07:00 are rejected in the strongest terms.

I respectfully urge the inspectors to consider the views of communities who have not been routinely included in consultation exercises, but whom real-world data and lived experience shows are now being negatively impacted by LLA noise.

Yours sincerely



Chair, Bourn Parish Council
Bourn Parish Council