

# Changes to London Luton Airport Arrivals

## CAP1616 Stage 7 Post-Implementation Review Annex D: Stakeholder Feedback and Complaints



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**NATS-LLA Public**

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## References

Ref No	Description	Links
1	SAIP AD6 CAA web page – progress through the airspace change process, and the consultation website including responses	<a href="#">Link to CAA portal</a> <a href="#">Link to consultation site</a>
2	CAA Decision Document CAP2288	<a href="#">Link to document</a>
3	CAA Data Request Document	<a href="#">Link to document</a>
4	Airspace Change Consultation material (selection of documents)	<a href="#">Executive summary</a> <a href="#">Link to abridged document</a> <a href="#">Link to full document</a>
5	Consultation virtual exhibition	<a href="#">Link to website</a>
6	Stage 4 Step 4A(ii) The Final Airspace Design (technical map for use on computers, unsuitable for smartphones and tablets, open using the <a href="#">free Adobe Reader DC app</a> to make use of switchable layers)	<a href="#">Link to downloadable map</a>
7	Airspace change: Guidance on the regulatory process for changing the notified airspace design (Edition 4 in force for this review) CAP1616	<a href="#">Link to document (Edition 4, March 2021)</a>
8	CAA Definition of Overflight CAP1498	<a href="#">Link to document</a> <a href="#">Link to short animation</a>
9	UK Government Department for Transport's 2017 Guidance to the CAA on its environmental objectives when carrying out its air navigation functions (abbreviated to ANG2017)	<a href="#">Link to website</a> <a href="#">Link to document</a>

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## 1. About this document: PIR items 58a-58b

### 1.1 Introduction

1.1.1 This document is part of the NATS-London Luton Airport (LLA) co-sponsored airspace change proposal post-implementation review (ACP PIR). It should be read in conjunction with the PIR Main Document which provides the structure, the majority of evidence, and details regulatory requirements for the PIR.

1.1.2 It should also be read in conjunction with the separate document Annex A Traffic Dispersion and Environmental Data.

1.1.3 This document summarises feedback and complaints from non-aviation stakeholders such as residents of local communities during the PIR period.

1.1.4 This document covers **PIR Items 58a** and **58b** of the CAA's list of PIR items:

**PIR Item 58a:** *Feedback/complaints received by the change sponsor and CAA in the period between implementation and post-implementation review from all relevant stakeholders. Narrative evidenced by supporting data (table format).*

**PIR Item 58b:** *Details of location of complaints (Under the ZAGZO Hold and between 7,000-5,000ft in clusters of >10 respondents). Ordnance Survey map (or equivalent) identifying pinned locations.*

## 2. Complaints received by London Luton Airport, NATS and the CAA

### 2.1 Logging methodology and background

2.1.1 This document provides information on all airspace change related complaints received during the PIR period.

2.1.2 Normally, the PIR data-gathering period would start the day the change was implemented. However, due to the implementation of the new airspace and flightpaths occurring following the main period of the UK's COVID-19 pandemic which had significant and long-term impacts on the UK's aviation industry during 2020 and 2021, the CAA agreed that data collection for PIRs would be suspended until it considered the aviation industry had sufficiently recovered.

2.1.3 In February 2022 the CAA declared that data collection could recommence and after a few reviewed dates, NATS-LLA and the CAA agreed that the data collection and reporting period would be 23<sup>rd</sup> September 2022 to 22<sup>nd</sup> September 2023. This means that we will analyse fuel, greenhouse gas emissions etc for the most recent summer (including noise impacts over summer 2023) and would not be required to analyse the previous summer.

2.1.4 However, we were also clear that complaints received will be analysed from the implementation date and will cover the full 575-day period from implementation until the end of the reporting period, i.e. 24<sup>th</sup> February 2022 to 22<sup>nd</sup> September 2023.

2.1.5 All airspace change related<sup>1</sup> complaints received during the PIR period were logged and investigated as per London Luton Airport's and NATS' complaints policies. Additionally, NATS-LLA asked the CAA for copies of any complaints they had received, that were attributable to this airspace change. The CAA supplied copies to us, with names redacted unless the response explicitly allows sharing, or if the respondent was a public representative such as an MP.

2.1.6 There are multiple ways in which a resident can submit a complaint regarding aircraft noise. They can submit complaints via email, utilise LLA's online flight tracking system TraVis, via an automated voicemail line, or by post. The analysis within this document takes into account feedback gathered through each of these communication channels.

2.1.7 The categorisation of complaints is made under two main headings<sup>2</sup>:

- General complaints: These are instances where a complaint is received regarding aircraft noise that does not pertain to a particular aircraft or a specific date and time.
- Specific complaints: These include complaints related to aircraft noise concerning a single aircraft, specifying a particular date and time of occurrence.

2.1.8 Under each of these headings, there are additional themes available for selection by the complainant when submitting a complaint via LLA's TraVis system. Alternatively, when a complaint is received via email, voicemail or letter, the person responsible for inputting the complaint into the system will choose the most suitable theme. The themes will be demonstrated and analysed further in the following sections.

<sup>1</sup> Complaints were identified as being 'airspace change related' if they came from a region that had not previously been overflown until the change was implemented, or if it was clear from the content of the complaint that the airspace change was a relevant factor.

<sup>2</sup> Every valid complaint is investigated. Not every complaint is responded to, depending on context, see LLA's complaints policy ([link](#)).

### 3. Results summary

- 3.1.1 From 24<sup>th</sup> February 2022 to 22<sup>nd</sup> September 2023, the total number of complaints relating to this ACP was 17,290. An additional 16 were received by NATS, and 2 from the CAA that were not also received by LLA or NATS; these were analysed separately in Section 4.4 and are shown separately from the numbers in this section.
- 3.1.2 These 17,290 complaints were made by 390 individual complainants.
- 3.1.3 Several individuals lodged complaints on multiple occasions throughout the 575-day PIR complaints recording period.
- 3.1.4 The following list summarises the impacts of a small number of complainants, the postcode region with the greatest number of complaints, and the months where the greatest and fewest complaints were received:
- One individual complainant accounted for 5,375 complaints, which is 31% of the overall total.
  - Three individual complainants accounted for c.53% of all complaints.
  - Six individual complainants accounted for c.70% of all complaints.
  - The top 50 complainants accounted for 95% of all complaints.
  - The postcode region with the highest number of complaints was SG19 accounting for 47% of the total. These were submitted by 109 complainants.
  - The highest number of complaints in 2022 were in July and August, whereas in 2023, they occurred in March and again from July through September.
  - The lowest number of complaints was in March and April 2022, with a decline noted from October 2022 to February 2023.

### 4. Analysis of complaints

#### 4.1 General complaints and specific complaints

- 4.1.1 As described in paragraph 2.1.7 above, the categorisation of complaints is made under two main headings: General Complaints and Specific Complaints.

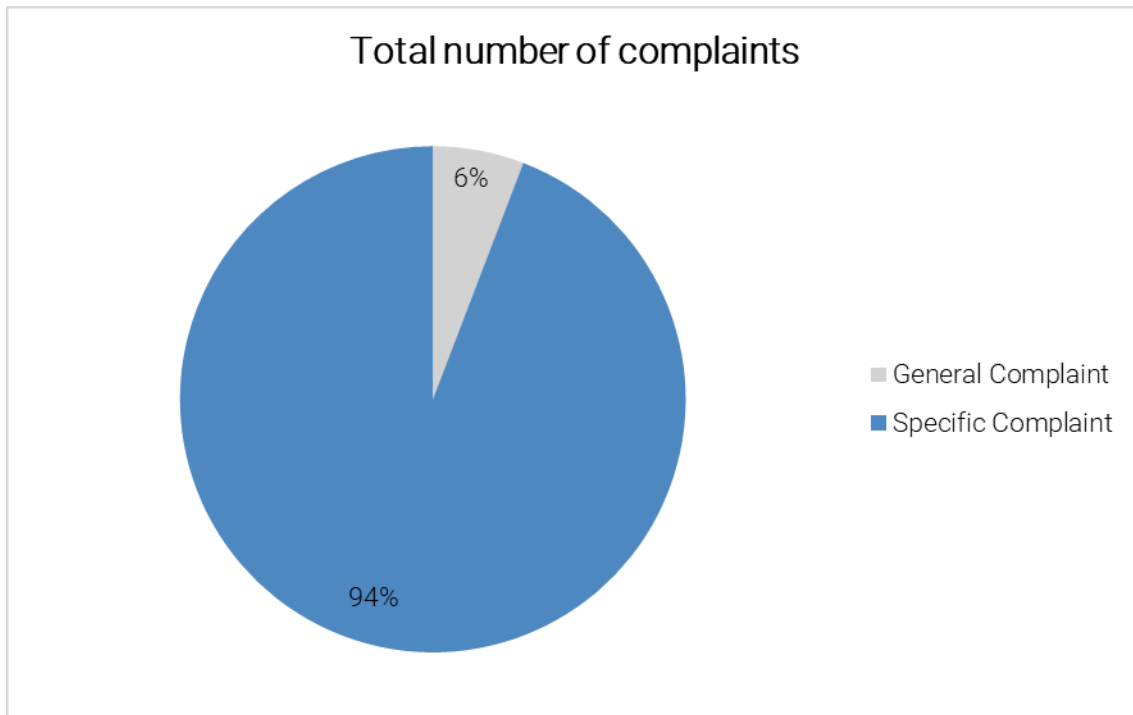
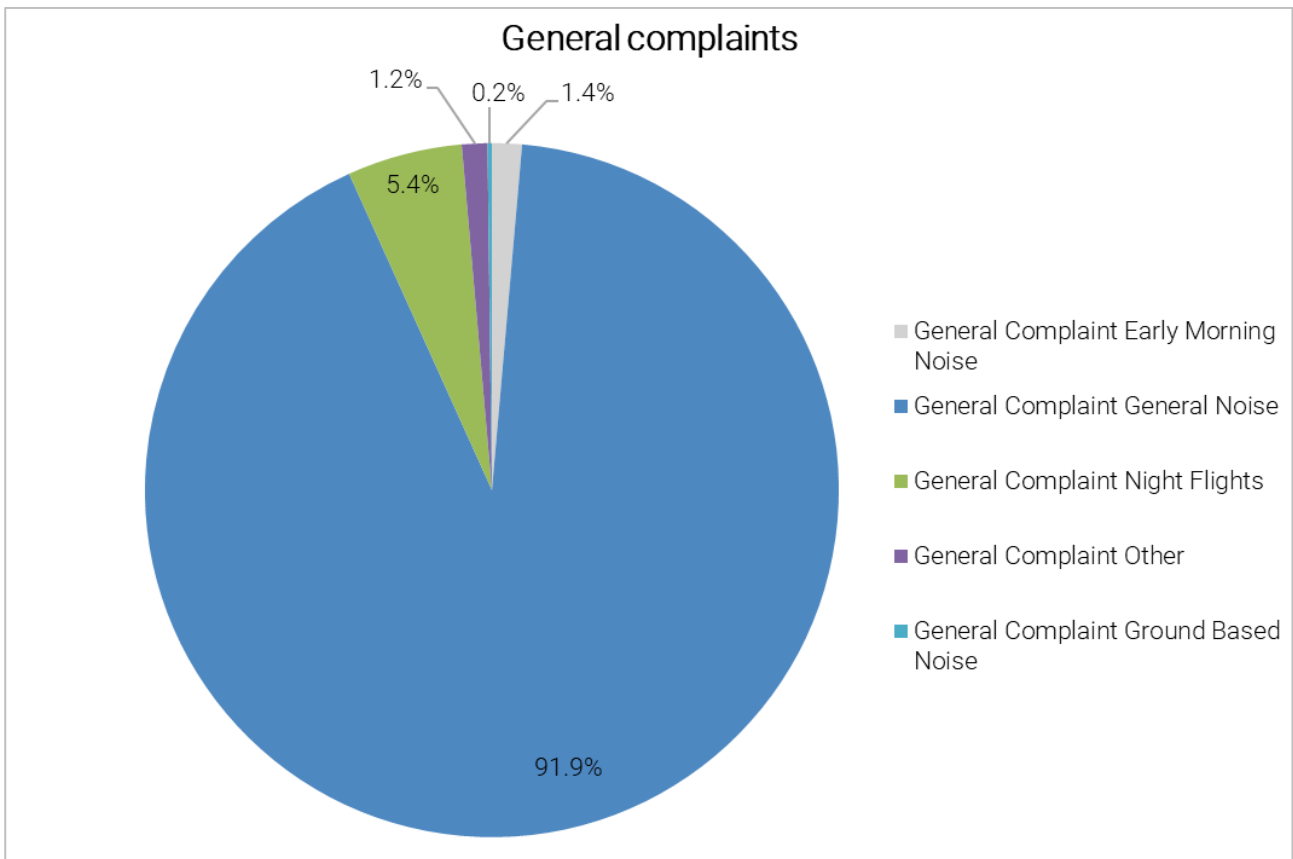


Figure 1 Proportions of General vs Specific Complaints (total 17,290)

- 4.1.2 The majority of complaints were specific to an identified aircraft; 16,283 which was 94% of the total.

## 4.2 General complaints

4.2.1 These are instances where a complaint is received regarding aircraft noise that does not pertain to a particular aircraft or a specific date and time.



**Figure 2 General complaints (total 1,007) - themes**

4.2.2 General complaints (1,007 in total) can be categorised into different themes. These were:

- Early Morning Noise
- General Noise
- Night Flights
- Ground-based Noise<sup>3</sup>.

4.2.3 The most frequent (c.92%) were General Noise complaints.

4.2.4 The 'Other' general complaints have been analysed and the main topics were:

- Whistling plane noise;
- Strong smell of aviation;
- Private jets environment pollution;
- Roar rumble and whistle of low flying aircraft;
- Pilots are cutting corners;
- Pollution and noise;
- Town of Sandy being used as secondary stack;
- Engine noise and screeching noise;
- Complaint system issues; and
- Below the expected altitude.

<sup>3</sup> The intent of the category 'Ground based Noise' was to allow complainants to refer to noise due to ground operations at the airport itself. Complainants from within the airspace change region would not be able to hear airport ground operations due to the distance of the change from the airport. We contend that these complaints misinterpret the original intent, and relate to noise that is heard on the ground.

### 4.3 Specific complaints

4.3.1 These include complaints related to aircraft noise concerning a single aircraft, specifying a particular date and time of occurrence.



Figure 3 Specific complaints (16,283) - themes

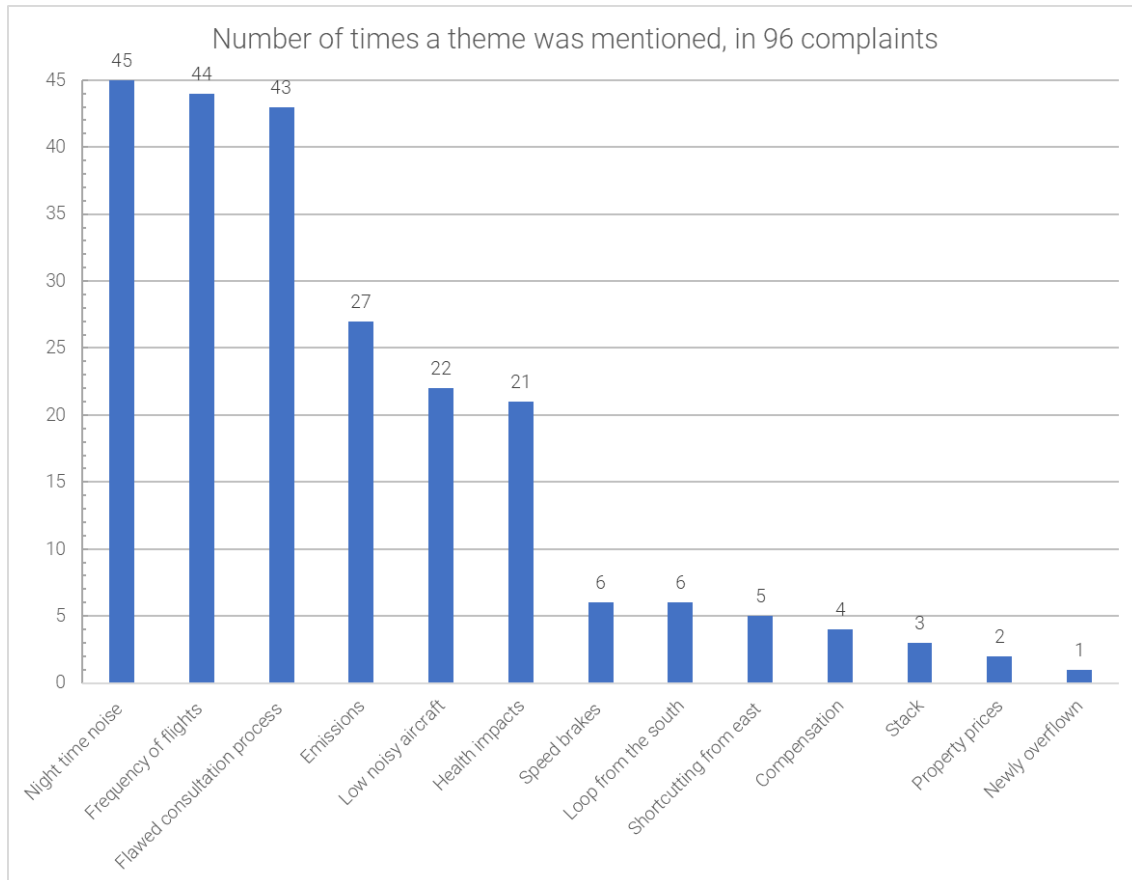
4.3.2 Night Flight, Off-track, Too Loud, and Too Low were the reasons for the specific complaints.

4.3.3 There were 14,951 categorised as 'Too Loud', constituting 92% of the specific complaints.

4.3.4 The least frequent were 'Off Track' complaints, totalling 78 (c.1%)

#### 4.4 Longer-form complaints submitted via email and post

4.4.1 Longer-form complaints were submitted by email and post, including those received from the CAA. There were 96 complaints of this type<sup>4</sup>. We carried out a qualitative thematic analysis. This section sets out the main findings from that analysis.



**Figure 4 Longer-form feedback – number of times a theme was mentioned, in 96 complaints**

- 4.4.2 There was a recurring theme across many of these complaints, which could be regarded as a universal concern applicable to almost every complainant. An example is aircraft noise in what were previously regarded as quiet rural areas with low ambient background noise levels. As this is a universal theme we have not separated it out in the chart above.
- 4.4.3 The most frequent specific theme in these 96 complaints was the impact of ‘night time noise’ (45 mentions) with people saying their sleep was disturbed. Some complainants said that this had a negative impact on their health (NB we have also identified this as a separate theme – 21 mentions).
- 4.4.4 The second most commonly mentioned theme was ‘frequency of flights’ (44 mentions). Complainants stated that flights were more frequent than expected, or more frequent than they had experienced previously. The flight frequency theme relates to both continuous activity throughout the day, or specific time of day, most notably during early morning or late evening rush hours. This noise was also felt to impact daytime activities, such as work, gardening, watching TV, etc. People said that this impact was absent prior to the airspace change.
- 4.4.5 Many people who raised ‘low noisy aircraft’ (22 mentions) as an issue, said they frequently heard a high pitch whining noise from aircraft and assumed that this was the aircraft trying to reduce speed and/or height, with 6 identifying this as the ‘use of speed brakes’.
- 4.4.6 Two themes could be grouped as tracks with flightpaths that did not match what was expected from the consultation: ‘loop from the south’ (6 mentions) and ‘shortcutting from east’ (5 mentions). The former relates to aircraft from the south flying further to the west than expected, and the latter about aircraft turning south before reaching the COCCU waypoint.

<sup>4</sup> If the same complaint was sent separately to NATS and/or LLA and/or the CAA, it was treated as a single complaint. 96 is the combined total.



- 4.4.7 Complaints about ‘emissions’ (27 mentions) encompassed both pollution from individual flights and broader climate change concerns.
- 4.4.8 ‘Compensation’ was mentioned by only 4 people and focused on whether grants were available for sound insulation.
- 4.4.9 Unrelated to the impact of the new flightpaths, ‘flawed consultation process’ (43 mentions) was the third most frequent criticism. Criticisms included: feedback that the consultation should not have taken place during the pandemic; that the consultation should have been communicated to people further away from Luton; and that the materials presented were too complicated to understand.

## 5. Complaints data by time period

### 5.1 Monthly Breakdown: Complaints

5.1.1 We analysed the number of complaints received per month.

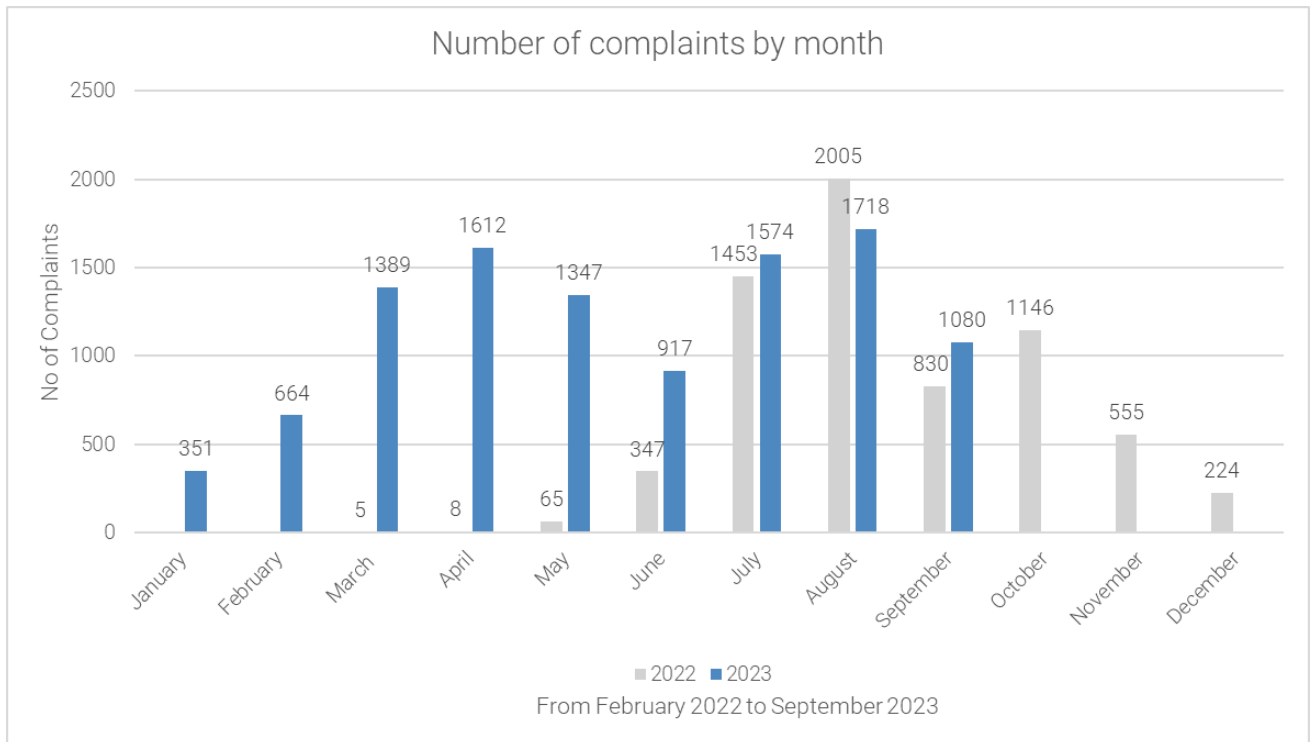
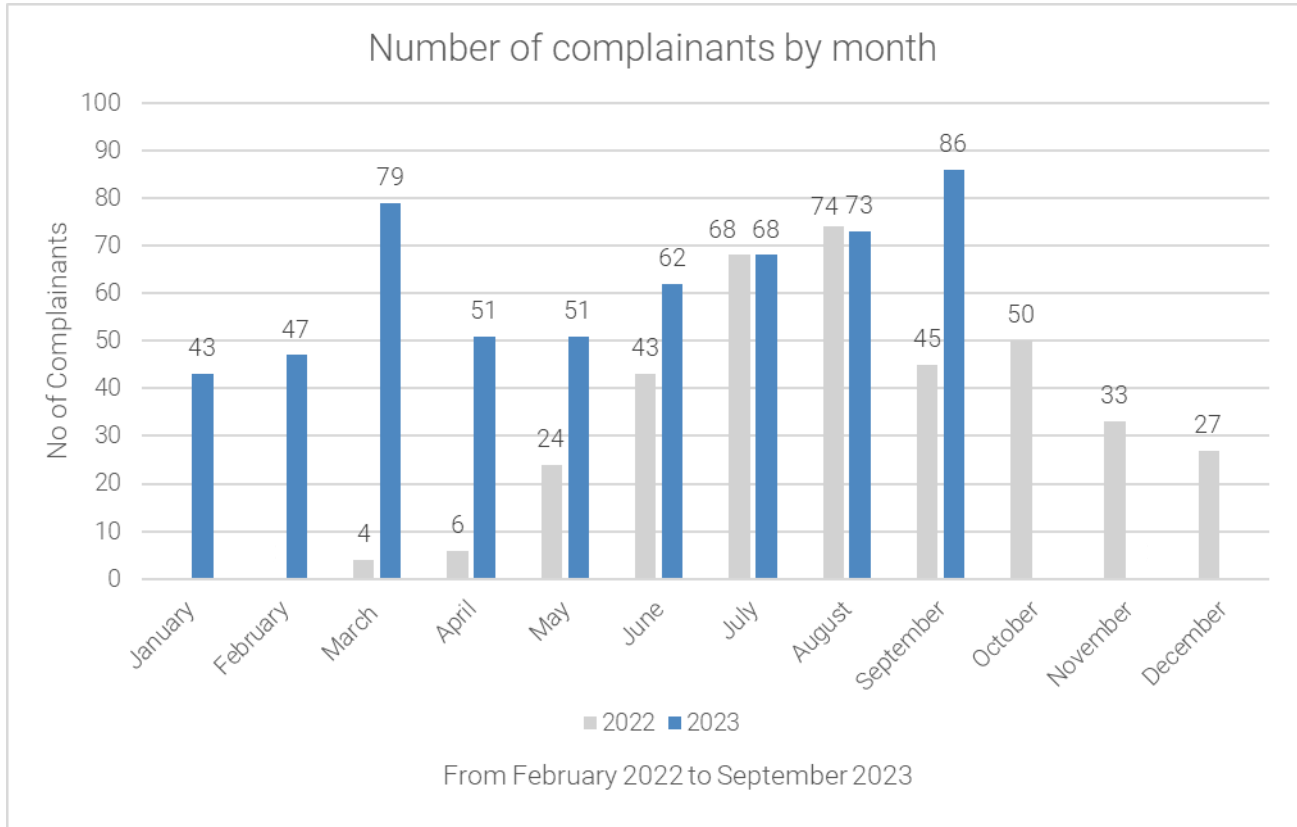


Figure 5 Number of complaints received, by month

- 5.1.2 August 2022 saw the highest volume of complaints, reaching a total of 2,005. Historically, August is one of the busiest months in the summer season, with typically c.6,000 arrivals (see PIR Master Document section 8.2). These complaints were potentially influenced by warmer weather, prompting residents to keep windows and doors open and to use gardens, parks or otherwise spend more time outside, consequently heightening the experience of aircraft noise.
- 5.1.3 The fewest complaints were submitted in March 2022 when only five were submitted. Historically, March is when the spring season starts, following the quieter winter period (see below). Typically, LLA has c.5,000 arrivals (see PIR Master Document section 8.2). This could be attributed to the fact that the implementation had only recently begun on 24<sup>th</sup> February, combined with weather less likely to be warm enough for residents to leave windows and doors open or to spend long periods outside.
- 5.1.4 There was a decrease in complaints observed from October 2022 to February 2023. The winter period tends to have fewer arrivals per month, decreasing from c.6,000 late summer to c.4-4,500. This decline in complaints is likely a combination of the reduction in flights combined with colder, wetter weather conditions, resulting in fewer people spending time outdoors, with windows more likely to be closed, consequently reducing exposure to aircraft noise.

## 5.2 Monthly Breakdown: Complainants

5.2.1 We analysed how many complainants sent complaints each month.



**Figure 6 Number of complainants making complaints, by month (390 individual complainants)**

5.2.2 From 24<sup>th</sup> February 2022 to 22<sup>nd</sup> September 2023, complaints relating to this airspace change were received from 390 individual complainants.

5.2.3 Note that some of these 390 individual complainants lodged complaints on multiple occasions throughout various months, in both 2022 and 2023. Therefore, in Figure 6 above, individuals lodging complaints in both January and February would be counted as a complainant in both months. Adding the complainants in each month of the chart totals 934 over the 19 month period.

5.2.4 September 2023 saw the highest number of complainants, reaching a total of 86. This increase could be attributed to complainants wishing to lodge a final complaint ahead of the end of the PIR period which was communicated as closing on 22<sup>nd</sup> September 2023.

5.2.5 Similar to the number of complaints by month above, the least number of complainants was in March 2022 (four complainants).

### 5.3 Note on post-PIR period complaints

5.3.1 After the published PIR period ended on 22<sup>nd</sup> September 2023, we continued to record the number of responses related to this airspace change, but they were not fully analysed or included in this document.

5.3.2 From the day after PIR closure (23<sup>rd</sup> September 2023) to 23<sup>rd</sup> March 2024 (6 months), there were 1,890 airspace change related complaints received by LLA.

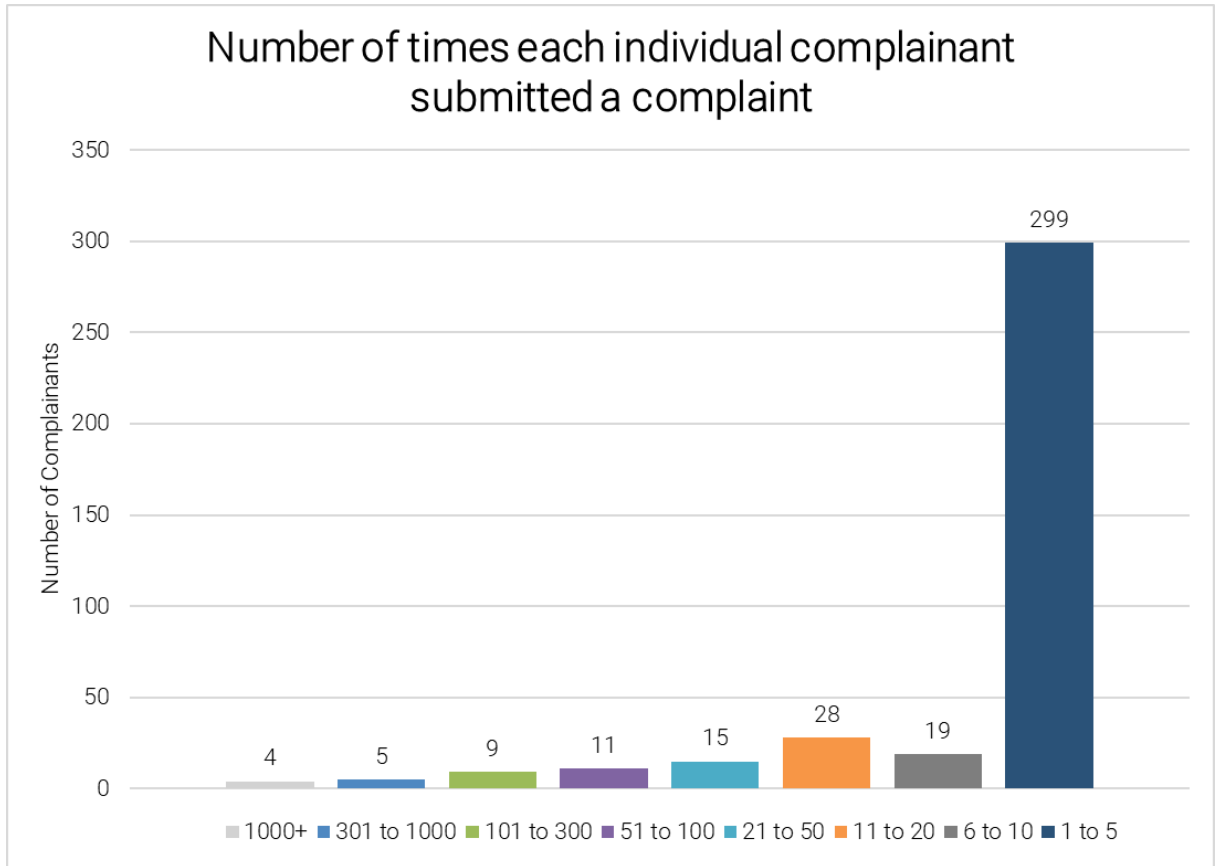
5.3.3 Between the same dates within the PIR period (23<sup>rd</sup> September 2022 to 23<sup>rd</sup> March 2023) there were 4,103 complaints. This means there was a **54% drop in complaints** after the PIR period ended.

5.3.4 From the drop-off in complaints after the PIR period closure, we infer that there was potentially a number of campaigns, intended to maximise the number of complaints against the airspace change and to encourage residents to submit complaints to LLA-NATS. It is believed the campaign(s) are now awaiting the outcome of the PIR before submitting any other complaints or objections to the airspace change.

## 6. Number of complaints compared with number of complainants

### 6.1 Analysis of frequency of complaint by individual complainants

6.1.1 The chart below sets out the number of times each individual complainant submitted a complaint.



**Figure 7 Number of complaints submitted by an individual complainant**

6.1.2 It shows that 4 complainants submitted more than 1,000 complaints each, while the vast majority of complainants (299) submitted a maximum of 5 complaints each, over the 575-day period.

6.1.3 For each resident submitting a complaint for the first time, LLA sent an information pack explaining the policies and procedures and specifically the AD6 airspace change. We believe this has supplied residents with enough information to ascertain if an aircraft is complying with these policies and procedures, and therefore resolved their concerns.

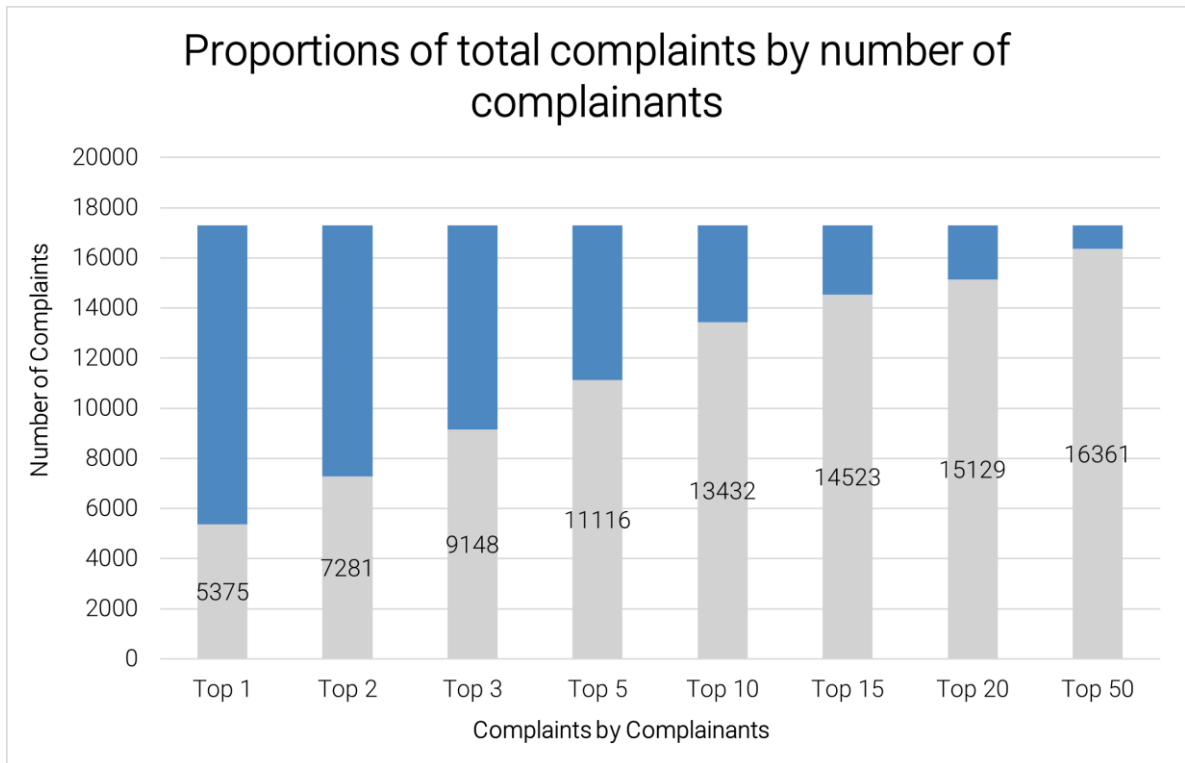
6.1.4 Additionally, LLA has reached out to the most frequent complainants and offered face to face meetings. These invitations were sometimes accepted and proved beneficial to residents as we have seen a reduction of complaints from them. LLA was unable to contact some of the most regular complainants because they chose not to respond to our invitation.

**6.2 Analysis of proportions of total complaints by individual complainants**

6.2.1 There were 390 individual complainants over the 575-day PIR complaints recording period.

6.2.2 The following chart shows the proportions of total complaints by the number of complainants.

6.2.3 The fixed height of the blue bar is 17,290, the grey portion of the bar shows the proportion of 17,290 complaints made by the specified number of complainants, up to the 50 most frequent complainants.



**Figure 8 Proportions of the number of complaints by the most frequent complainants**

6.2.4 Of the 390 complainants:

- The most frequent 50 account for c.95% of the total complaints
- The most frequent 3 complainants accounted for c.53% of the total complaints
- The most frequent individual complainant accounted for c.31% of the 17,290 total complaints

## 7. Complaints data by location

### 7.1 Postcode districts with most complaints

7.1.1 Complaints were analysed by location. The first part of the complainants' postcodes was used to identify the district, with the second part used to identify the specific location.

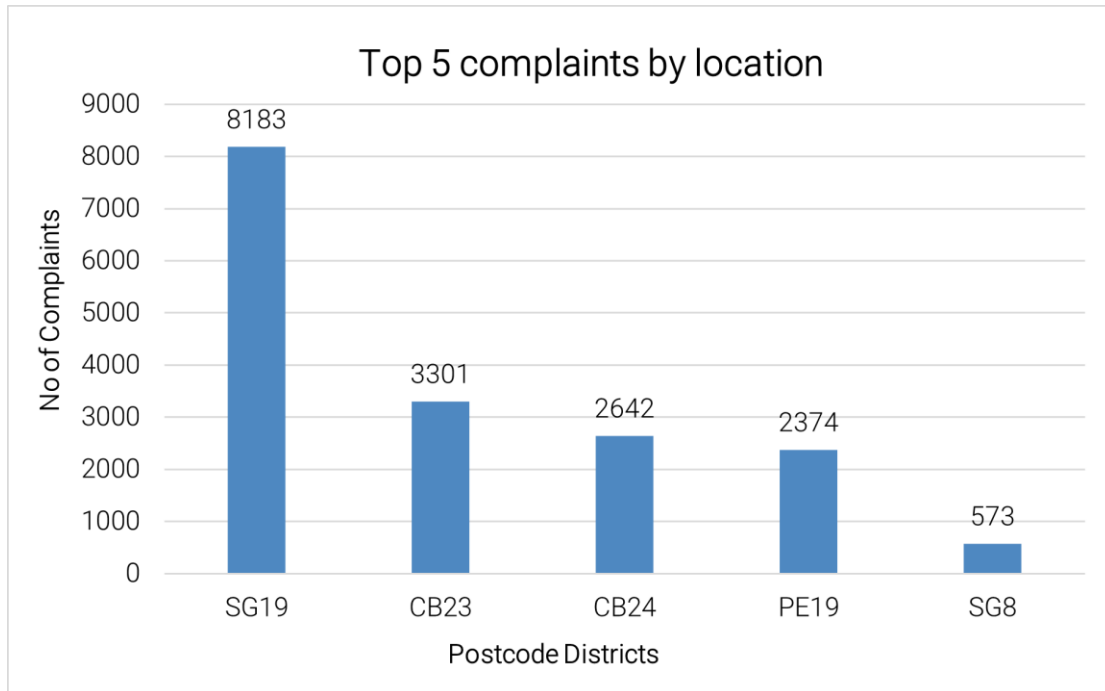


Figure 9 Complaints by postcode district

7.1.2 The top 5 postcode districts produced the following complaints:

- SG19 produced 8,183 complaints (47% of the total) by 109 complainants from 70 postcodes.
- CB23 produced 3,301 complaints by 97 complainants from 71 postcodes.
- CB24 produced 2,642 complaints by 45 complainants from 45 postcodes.
- PE19 produced 2,374 complaints by 24 complainants from 18 postcodes.
- SG8 produced 573 complaints by 26 complainants from 22 postcodes.

7.1.3 More location data, including maps, follows.

## 7.2 Overview of location based complaints data

7.2.1 Figure 10 shows a map of the five postcode districts with the most complaints. It also shows an overview of complaints hotspots; these are the largest number of highly localised complaints in each of the five postcode districts<sup>5</sup>.

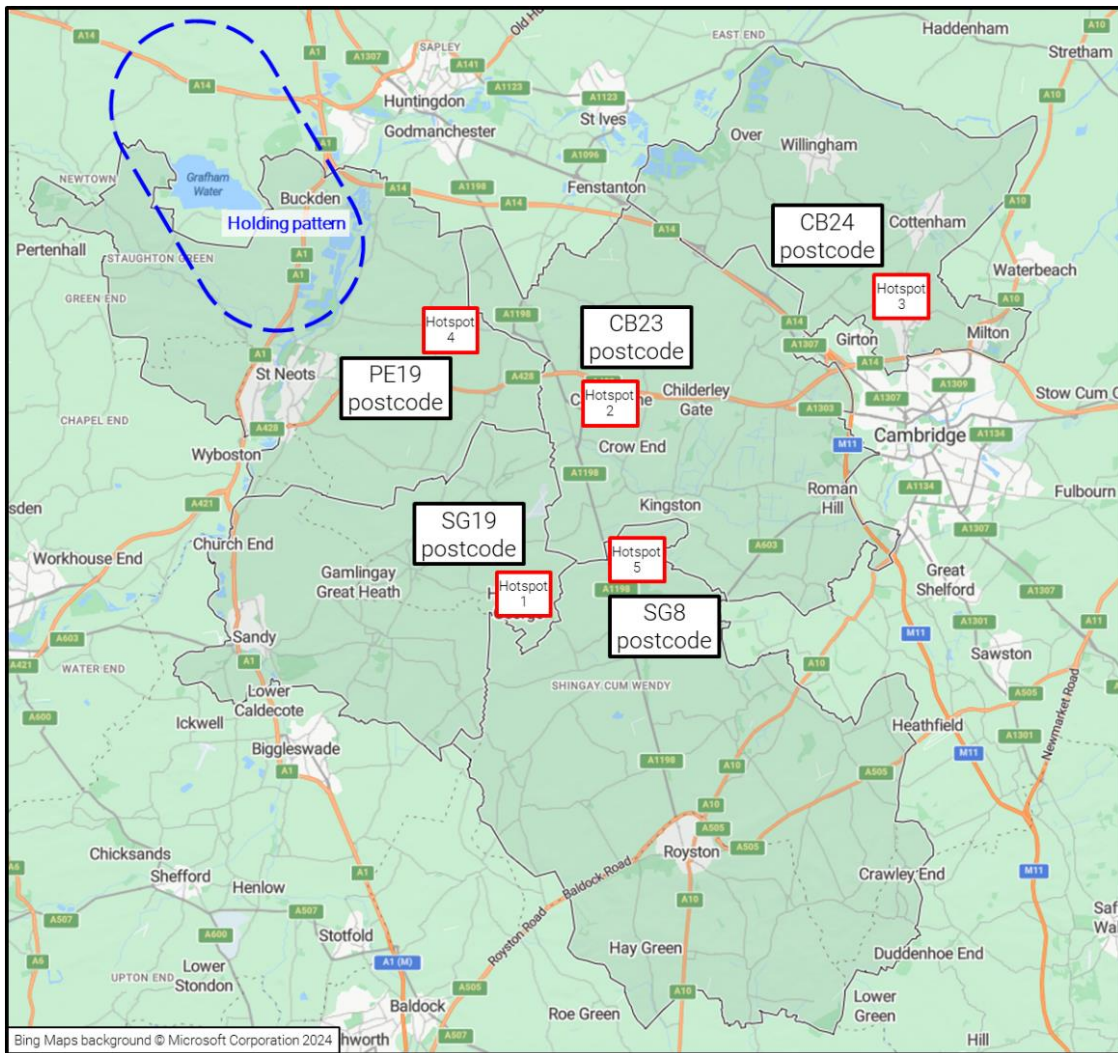


Figure 10 Postcode districts with most airspace-change-related complaints: Overview

## 7.3 Frequency of complaints

7.3.1 See Figure 11 on p.15 opposite for more details on the hotspot locations, including illustrations of altitude of overflight and number of complainants making those complaints.

7.3.2 Most complaints came from areas newly overflown, mainly at or above 7,000ft.

<sup>5</sup> The top hotspot in each main postcode area is highlighted. In some cases there are spots in the same postcode district which contain more complaints than the greatest number in an adjacent postcode district.

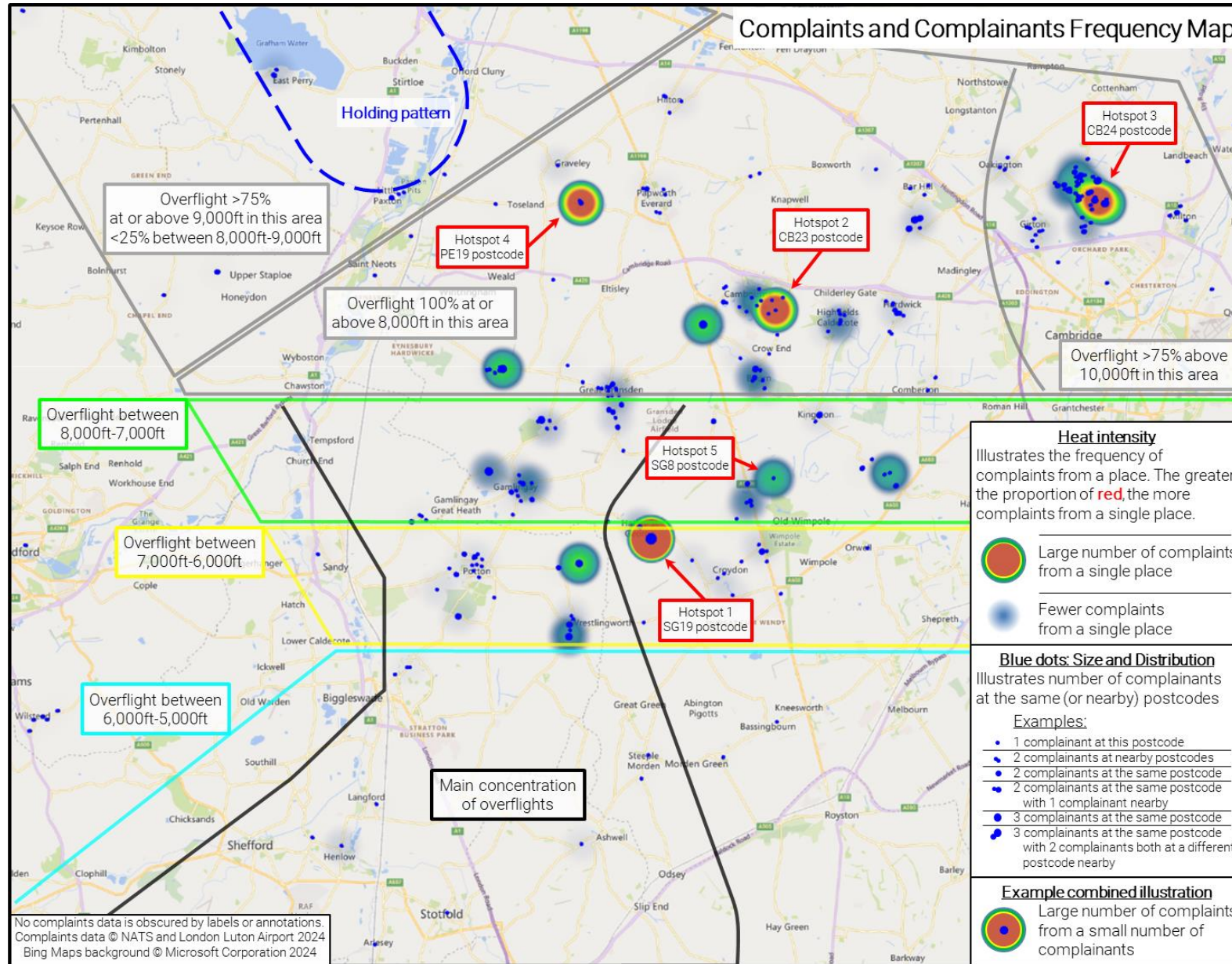


Figure 11 Complaints and Complainants Frequency Map including overflight altitudes

- 7.3.3 Note: Figure 11 should be used in conjunction with the separate Annex A which provides charts illustrating actual air traffic dispersion at all altitudes across this region, comparing the pre-change period with the PIR period, using radar data.
- 7.3.4 Figure 11 illustrates two types of complaint data; the number of airspace-change-related complaints from a location (heat intensity spot showing the frequency of complaints from a place), and the number of complainants submitting those complaints (blue dots).
- 7.3.5 There were few complaints under, or to either side of, the holding pattern known as ZAGZO which was implemented as part of the airspace change.

#### 7.4 The top complaints hotspot in each postcode district

- 7.4.1 **Hotspot 1** illustrates the largest number of localised complaints in postcode district **SG19**, centred on the village of East Hatley.

Over the 575-day period where complaints relating to this airspace change were analysed, one complainant submitted 5,375 complaints (an average of 9 or 10 per day), with a second individual complainant submitting a further 1,034 complaints. Flights over East Hatley were predicted to be descending from 7,000ft to 6,000ft (as per the yellow box in Figure 11). East Hatley is at the northern edge of the yellow box boundary with the green box (where overflights descend to 7,000ft), so the majority of flights (c.85%) over East Hatley are still at, or slightly above, 7,000ft.

- 7.4.2 **Hotspot 2** illustrates the largest number of localised complaints in postcode district **CB23**, in the Cambourne area.

One complainant submitted 1,906 complaints. Flights over Cambourne were predicted to be at or above 8,000ft (as per the northern-central grey box in Figure 11). All flights over Cambourne are at or above 8,000ft, with c.35% at or above 9,000ft.

- 7.4.3 **Hotspot 3** illustrates the largest number of localised complaints in postcode district **CB24**, around the villages of Histon and Impington.

The top two complainants in this district each submitted over 900 complaints. Histon and Impington are close to the step-edge of a higher airspace volume to the east (between Landbeach and Waterbeach), where flights cannot descend below 11,000ft. Due to their proximity to this airspace step, flights over Histon and Impington are mostly still at or above 11,000ft. Even at the western curved edge of the northeastern grey box in Figure 11, c.75% of LLA arrivals are still at or above 10,000ft, with the remaining c.25% between 10,000ft-8,000ft.

- 7.4.4 **Hotspot 4** illustrates the largest number of localised complaints in postcode district **PE19**, centred around the village of Yelling.

One complainant submitted 1,869 complaints. Flights over Yelling were predicted to be at or above 8,000ft (as per the northern-central grey box in Figure 11). All flights over Yelling are at or above 8,000ft, with c.45% at or above 9,000ft.

- 7.4.5 **Hotspot 5** illustrates the largest number of localised complaints in postcode district **SG8**, northwest of the village of Arrington.

One complainant submitted 358 complaints, an average of 4 complaints per week. Flights in the vicinity of Arrington were predicted to be descending from 8,000ft-7,000ft (as per the green box in Figure 11). All flights in the vicinity of Arrington are at or above 7,000ft, with c.50% at or above 8,000ft.



## **8. Conclusion**

- 8.1.1 The hotspots in Figure 11 indicate that a small number of complainants submitted disproportionately large numbers of complaints (see also Section 6 from p.11).
- 8.1.2 Three of the hotspots were in regions where overflight was at or above 8,000ft, often higher. The other two hotspots were mainly overflown at or above 7,000ft.
- 8.1.3 There were very few complaints under, or either side of, the new holding pattern.
- 8.1.4 Annex A has detailed overflight diagrams, we recommend studying that document to understand where and how often overflight occurred during typical arrival operations.
- 8.1.5 LLA will continue to log and monitor the pattern of complaints related to this airspace change and will include that data in LLA's quarterly monitoring report, which is published on the LLA noise section of the website. NATS will also continue to monitor complaints.

End of Annex D: Stakeholder Feedback and Complaints

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