



**Ian Sollom**

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Robert Bishton, CEO  
Civil Aviation Authority  
Aviation House  
Beehive Ring Road  
Crawley, West Sussex  
RH6 0YR

Thursday 17th October 2024

Dear Mr Bishton,

I write to you with respect to the Swanwick Airspace Improvement Programme – Airspace Deployment 6 (AD6) and the Post Implementation Review (PIR) Feedback process that concluded on the 11th of September 2024. Firstly, I wanted to thank you for hosting the PIR Feedback. The process granted stakeholders and members of the public in my constituency the opportunity for fair engagement with the programme and, as you will see from the 116 responses posted, this opportunity was welcomed by many.

These voices must not go unheard, and as such **I am requesting a comprehensive and detailed response to the issues raised during the PIR Feedback window.**

I would like to draw your attention to a report published by RELAS (Reject Luton Airport Stacking), a community group representing a significant number of affected residents from Cambridgeshire, Huntingdonshire and Bedfordshire. Many of these residents live in my constituency of St Neots and Mid Cambridgeshire and I have received several concerned correspondences from these people.

The report outlines significant concerns regarding the AD6 airspace change and argues that London Luton Airport not only failed to appropriately consult affected parties during its initial trial implementation of AD6 but has continually failed to comply with the agreed flight path. For example, RELAS analysis shows that the vectoring area laid out in the original design, one proposed to host 70% of arrivals, has been used for only 3% of air traffic arrivals during the AD6 trial period. This is just one of many factors that have caused serious noise disturbance and a diminishing quality of life for many of my constituents who moved to the area precisely to avoid this kind of nuisance. I do hope you will take the time to thoroughly review the RELAS report, which I have attached alongside this letter.

While I commend London Luton Airport for organising the upcoming 'Airspace and Noise Week', offering more a transparent channel of communication between LLA Operations and the affected communities, I must also draw your attention to some inclusivity concerns raised by my constituents. The requirement for physical attendance at these events, alongside their proposed hours (held at 10am and 1pm) make the sessions inaccessible for many working residents. The request for submission of a postcode in order to attend is also a concern, as it is not clear what criteria are being applied to judge that the events are 'relevant' to participants' location. I worry that this may exclude the participation of my constituents, many of whom live in places that may be considered 'far away' from LLA but are acutely affected by the AD6 flight path.

Will you work with LLA to ensure that all voices are heard, and all communities have an equal chance to communicate with the airport during this event?



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As you say yourself in a letter dated 19 September, “community feedback within the airspace change process demonstrably does have an impact on the final design ultimately proposed to the UK Civil Aviation Authority... and the decisions we make”. Providing a detailed response to the issues raised during the PIR Feedback window, as well as communicating exactly how residents’ feedback will be implemented into the final decision to expand London Luton Airport is your chance to make good on this claim.

I look forward to your response. Yours sincerely,

A handwritten signature in black ink that reads "Ian Sollom".

**Ian Sollom MP**



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Wednesday 30th October 2024

### **January 2025 Government Decision on London Luton Airport Expansion**

Dear Secretary of State,

I write to you regarding the Government's upcoming decision on London Luton Airport expansion, expected on the 3 January 2025. **I urge you to reject the plans for expansion.**

I have particular concerns on behalf of my constituents regarding the Swanwick Airspace Improvement Programme – Airspace Deployment 6 (AD6) process, currently in Post Implementation Review.

Luton Rising, the trading name of London Luton Airport Limited, claims that their expansion project has been “shaped by more than 8,000 responses to consultations undertaken in 2018, 2019 and 2022”. However, there was minimal overlap between these consultation windows and the implementation of the AD6 flight path – a path design which constitutes a significant change to how aircraft approach the expanded airport. While the Luton Rising public consultation window concluded on 4 April 2022, the AD6 flight path was only implemented on the 24 February 2022. I'm sure you will agree that a mere 40 days did not constitute an appropriate timescale for my constituents to engage with the Luton Rising consultation and make their voices heard in light of the new and overwhelmingly negative experience of AD6 implementation.

The airspace change has had a detrimental impact on the environment, public health, and quality of life for residents in the St Neots and Mid Cambridgeshire area. This is, in significant part, due to failure to adhere to the original flight path proposals. For example, analysis carried out by the Reject Luton Airport Stacking (RELAS) group shows that the vectoring laid out in the original flight path design, one proposed to host 70% of arrivals, has been used for only 3% of air traffic arrivals during the AD6 trial periods. The CB24 area in particular was not consulted on AD6, and yet convoys of often five or six flights at three-minute intervals are not unusual before or around 8am, causing intrusive noise disturbance. These are just two of many concerns that have diminished the quality of life for my constituents, and they are concerns that I have taken up with the CAA during the AD6 Post Implementation Review Process.

I also wish to echo the climate concerns outlined in a letter to you from my colleagues, the Honourable Member for St Albans, and the Honourable Member for Berkhamsted and Harpenden, dated 8 July 2024. Since their letter, new recommendations for the coming year have been published by the Climate Change Committee (CCC). These could not be any clearer: **Stop airport expansion without a UK-wide capacity management framework.**



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This is the second consecutive year that this recommendation has been made by the CCC. In 2023, they stated that “no airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector GHG emissions and non-CO2 effects.” The same report recommends that the framework be developed “over the next 12 months and... be operational by the end of 2024.” If the new 2024 report makes the very same recommendation, then this is surely evidence that no such framework has been implemented. Recently, the Advertising Standards Agency ruled that a Luton Rising claim that if any of their “environmental limits” were missed, the expansion would be “stopped in its tracks” was misleading. These “environmental limits” did not include air traffic movements – which account for 83.7% (or 1,341,235 tonnes CO2e) of LLA’s total greenhouse gas (GHG) emissions. Failing to place limits on GHG emissions is unacceptable if the UK is to meet net zero targets. Moreover, if Luton Rising cannot be trusted to advertise these correctly, nor properly implement flight path changes, they should not be trusted to expand in the sustainable and fair way that must be required if expansion is to go ahead.

Should you be minded to approve expansion to London Luton Airport, you must ensure that one of the conditions of development be that limits on GHG emissions and non-CO2 effects include those generated through air traffic movements, and that these limits are properly monitored and enforced. Appropriate powers to undertake this work must be given to the CAA, and this should include powers to enforce the original AD6 proposal.

I hope that you take the time to consider the above issues in your decision-making and look forward to receiving your response.

Yours sincerely,

**Ian Sollom**

*Member of Parliament for St Neots and Mid Cambridgeshire*

Chief Executive's Office



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Date: 31 October 2024

Dear Mr Sollom

Thank you for your most recent letter dated 17 October regarding the Post Implementation Review (PIR) for Airspace change program (ACP-2018-65), Swanwick Airspace Improvement Programme - Airspace Deployment 6.

We welcome all the responses posted by your constituents. Now that the feedback window has closed, the Civil Aviation Authority (CAA) is in the process of carrying out a review of the airspace change sponsor's PIR analysis, and the corresponding stakeholder feedback. Please be reassured that we will carefully consider all evidence and views submitted during the designated feedback period in accordance with the CAP1616 process, including the RELAS report you refer to.

We anticipate that the report will be completed by the end of Q1 2025, but that will depend on whether our review identifies the need for any additional data from the change sponsor. In relation to Luton Airport's Airspace and Noise Week, which took place in the middle of October, the CAA encourages airports to develop effective relationships with their local communities and recognises the information requirements of those communities. This type of event is outside the regulatory airspace change process and we do not have a direct regulatory role in relation to it. If you or your constituents have any feedback that could help improve similar events in the future, we would recommend raising this with the airport directly. Thank you again for your continued engagement.

Yours sincerely

A handwritten signature in black ink, appearing to be "Rob Bishton", written over a horizontal line.

Rob Bishton  
Chief Executive  
UK Civil Aviation Authority