

## **HIGH EASTER PARISH COUNCIL**

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Dear Sir/Madam

### **NATS consultation 'Departure Route proposal at London Stansted Airport'**

High Easter Parish Council strongly objects to the proposal to re-route existing aircraft departing from Stansted Airport on the 'Dover' route to the 'Clacton' route, as detailed in the above consultation. We fiercely challenge this piecemeal approach by NATS when it has been stated that the LAMP phase in 2018/19 will propose a significant redesign of the Stansted routes. We cannot support this proposal and additionally need to understand the long term implications, including the impact of a second runway in the South East and would urge that this part proposal is not implemented.

High Easter is a both village and a large parish, with many outlying homes and businesses. The village has evidence of Roman settlement and has been an established settlement since before the Norman Conquest, today much of the land in our parish is used for intensive arable cultivation.

The current 'Clacton 22 East' route flies directly through the village entering at the North West and exiting at the East. Aircraft are below 7,000ft throughout, significantly and adversely affecting the tranquillity of our village, both by reason of noise and visual intrusion. There are no statistics provided in the consultation for population or households which will be over flown at between 4,000 and 7,000ft; in a rural area with low ambient noise the impact of aircraft noise is magnified. Furthermore the statistics quoted take no account of the pattern of flights with significant concentrations at certain points during the day, neither do they account for the time taken for the noise to abate. If the current proposal by NATS is implemented it will see the number of aircraft overflying at least double and when Stansted operates at the capacity for which it has planning permission this would be a quadruple impact with aircraft overflying constantly every few minutes, the result for those living here will be intolerable.

The proposal claims three key benefits from the re-routing of flights. From the evidence provided in the consultation this Council is not convinced that these are reasonable or evidenced benefits that would warrant such a significant change to departing aircraft routes.

### **1. Reduced CO2 levels**

The consultation provides data in table 3 on Annual CO2 emissions savings, these statistics measured in ‘tonnes’ are totally meaningless to the reader.

Information provided by SSE in their response states ‘The reduction in overall CO2 emissions is negligible – less than 1%.’ High Easter Parish Council does not support the view that this statistic on emission savings is of any significance to support this key benefit.

### **2. ‘Reduced delay (for Stansted and neighbouring airports)’**

There is no supporting data within the consultation to back up this stated benefit.

Currently airlines have the option to use either the Clacton or Dover route. If there were fuel efficiencies or reduced delays for airlines we would challenge why the low cost budget airlines who are the main users of Stansted are not choosing to use this route now. High Easter Parish Council challenges this benefit and would welcome comments from airlines on why this route is not currently used out of preference.

### **3. Reduction in the number of people regularly overflowed during the day**

The data provided in the consultation does not support this claimed benefit. The document states that 1,470 fewer people would be regularly overflowed below 4,000 ft. whilst 2,400 people would be overflowed more intensively (a 63% increase). This is the height where noise is most disruptive and using NATS own guidelines “<4,000 ft is the height where noise disruption should be of prime consideration to routing.”

Noticeably no comment is made of the households and population for flights between 4,000ft and 7,000ft where noise is a significant and major issue in the largely rural area with low ambient noise levels.

### **Additional comments**

In addition to the above we believe there are a number of factors which have not been discussed in the proposal, and which demonstrate strong arguments against it. They are detailed below:

#### **1. The impact of noise in rural areas**

For aircraft departing on the ‘Clacton’ route the sharp turn off the runway, that brings these flights directly through High Easter, slows the rate of climb and keeps the planes in the narrow corridor of the Noise Preferential Route (NPR) for a longer period. The “continuous climb” in this narrow corridor will result in planes coming over High Easter at a generally reduced height with engines operating more intensively to gain height “quickly”. This will inevitably lead to significantly increased noise levels for longer over sustained time periods. More people will be affected by intensive noise levels for longer.

This Parish Council directs NATS to the comments made by the CAA regarding aircraft noise and the effects of noise on people’s health and quality of life. Adverse effects noted range from disrupted sleep to physical health risks and there is a clear acknowledgement that the

‘annoyance’ level must be taken into consideration. For air traffic that extends into rural or semi-rural areas even a lower level of aircraft noise can have a greater impact on quality of life and wellbeing.

## **2. The effect of pollution as a result of fewer flight paths**

The consultation makes no reference to the impact of air pollution or the health effects to local residents as a result of focusing flights into fewer and narrower corridors. As already mentioned High Easter is intensely farmed arable land, there is no statement made in the consultation to the potential effects on these crops.

## **3. The London Airspace Management Programme (LAMP)**

The proposal is stated as being a part of The London Airspace Management Programme (LAMP) and the consultation document that ‘no significant redesign of Stansted airport can be considered until Phase 2’. The consultation goes on to state “LAMP is therefore being addressed in phases to deliver not only short-term individual improvements, but also the best solution for the overall airspace system when all phases are complete.”

As already stated it is impossible to fully understand the impact of these proposals without an understanding of the whole plan. It is essential to the residents of High Easter that there is stability so that people know where aircraft noise will be experienced. Introducing a piece meal approach to such a key issue is not providing stability.

Earlier this year a consultation looked at rerouting scenarios for the South of England, specifically Gatwick and included a questionnaire for response. One of the key themes that emerged from this consultation was the consideration given to sharing the impact from flight paths across multiple routes rather than focusing it in one area, because of the benefits from lower concentrations of noise and air pollution. This is totally in contrast to the proposal for Stansted and this Parish Council would question why?

## **4. Growth Effects**

Stansted is currently operating at half its permitted capacity. When this level is reached and if these proposals were implemented it could see more than four times the current numbers of aircraft on the ‘Clacton’ route and result in flights every few minutes during concentrated periods. As expansion occurs this will become intolerable in this rural area.

In summary High Easter Parish Council repeats its strong opposition to the proposal. The timing of this consultation over the summer holiday period has made it challenging to engage with the community; we have not seen any attempt from NATS to publicise this event or to consult with the local communities in comparison to other parts of the LAMPs consultation, e.g. Gatwick Airport. At the very least an extension to the consultation period is required to allow time to make a full and adequate comment on these proposals. The lack of information and accurate statistical data and analysis to support the proposals is of real concern to this Council; it makes it impossible to come to any accurate conclusions, other than the proposals if implemented would have a significant and detrimental impact to the community of High Easter.

Yours sincerely

**HIGH EASTER PARISH COUNCIL**