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TCN Consultation  
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BY POST AND EMAIL

Dear Sirs

### **Consultation for Terminal Control North (TCN) Airspace Change Proposal**

I am writing on behalf of Stop Stansted Expansion ('SSE') in response to the NATS' Consultation for the TCN Airspace Change Proposal ('the Proposal').

SSE represents some 7,000 members and supporters including 140 parish and town councils, residents' groups, national and local environmental groups and other organisations.

Our response to the Proposal, set out below, is primarily based on the impacts associated with the operations of Stansted Airport in the East Herts and West Essex region.

1. NATS seeks to change the way in which aircraft fly over a large area of south east England. It is not clear why this change is necessary. While NATS states that the reason is to increase the efficiency of flight profiles and solve converging Heathrow/Luton departure routes congestion, we take a different view:
  - The airspace is neither at saturation point, nor is it unsafe. There is still capacity in the system.
  - The current delay per flight in the system due to Air Traffic Control is very small, just a few minutes.
  - No London airport in the south east has planning approval for any expansion.
  - The changes only appear to benefit the airspace users, namely the airlines.
  - The changes do not reduce the overall amount of aircraft fuel burn and emissions per flight. In fact the total amount of fuel burn and emissions will increase as the number of aircraft movements has been assumed to increase.
2. NATS does not address those parts of the system where no changes are proposed. The Proposal therefore does not provide a total picture of all aircraft flying in the region and the cumulative impacts of the result of the changes.
3. NATS proposes only one solution without describing alternatives and discarded options. There is no explanation provided for the methodology used for

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*Stop Stansted Expansion is a working group of the North West Essex and East Herts Preservation Association*

assessing alternatives and discarded options or the scoring basis for ranking the degree of importance. This does not allow consultees the opportunity to make any comparative judgements on the Proposal.

4. NATS claims environmental benefits by moving routes to fly over less densely populated areas giving lower population counts under these new routes. This is considered to be disingenuous since
  - It masks the fact that an increased number of aircraft in the region will give rise to more noise and emissions being generated.
  - It defines noise impact by the number of people affected rather than the amount of noise that communities would suffer.
  - It takes no account of background noise levels in the region which, for low noise environments in rural areas, would result in loss of tranquillity: overall there will be more losers than winners in the region as a result of the proposed changes.
  - The reduction in population counts is only applicable to the new holding stacks and the new departure routes up to 4,000ft. The population under the remainder of the new departure routes and all the new arrival routes is not counted. Aircraft noise and visual intrusion will be suffered by this additional section of the community.
  - For Stansted Airport, the population count within the 57 dBA 16-hour contour in 2009 is in fact predicted to increase by 220 (8.6%).
5. NATS proposes to disestablish the two current holding stacks for Stansted and Luton Airports and replace them with three new dedicated holds. Two of these holds are assigned to Stansted Airport arrivals. However NATS has said, in answer to questions, that there is a *'relatively low incidence of holding during high arrival demand'*. It is therefore considered that the current two shared holds are adequate and the case has not been made for the creation of new holds.

Furthermore, the European Central Flow Management Unit (CFMU) in Brussels performs an important role in managing the whole European network balancing demand and capacity such that overload and congestion is minimised.

In addition it is understood that considerable effort is being expended by European Air Navigation Service Providers to develop new Controller support tools and associated procedures to improve efficiency. Instead of creating new holds, NATS should be accelerating its development programme of new Controller tools such that the creation of an additional hold (three instead of two) is unnecessary. NATS' objective should be to reduce the need for holds. It is considered unacceptable that NATS is now proposing an additional hold instead of having anticipated, invested in and introduced measures that would obviate the need for holds.

In its airspace change proposal, NATS takes advantage of the increased navigation accuracy provided by P-RNAV equipped aircraft. This technical advance has been implemented by the airlines and it is considered that NATS should have introduced similar advances for its own systems.

6. Many consultees have asked why holds, even if they are required, are not positioned over the sea. The two new Stansted holds are proposed to be positioned over tranquil areas and NATS does not appear to have taken account of the noise impacts that would result in an environment of low background noise. The reasons given only appear to benefit the user and airport operator to

create an efficient stream of aircraft for landing during the '*relatively low incidence*' of busy periods. It has already been argued above that new holds should be unnecessary and it is considered that if the current shared holds are inadequate for the '*relatively low incidence*' of busy periods, then methods should be found to place these aircraft in a pre-holding pattern over the sea.

7. For Stansted Airport operations, the route lengths of the changed departure routes will typically increase by between 6 and 8 miles per flight. Some of the changed arrival routes will increase and others will decrease with the overall result of an arrival route increase of about 2 miles per flight. It is therefore estimated that the route mileage flown in this area would increase by an average total of approximately 2,500 every day with a corresponding increase in noise and emissions generated around Stansted Airport. While there will be some locations which will suffer less noise, others will suffer more and it is difficult to see how an extra 2,500 route miles every day will not be unfavourable to the local community.
8. It is clear that aircraft using the two new Noise Preferential Departure Routes (NPRs) proposed for Stansted Airport will now fly more route miles over this area before heading to their ultimate north and south west destinations. This change has particular adverse impact on the communities that will now be overflown; while the population count is shown as lower than for the two current NPRs, it takes no account of the fact that these current NPRs have been stable and are a known environmental harm.

A particular effect of the proposed new westerly departure route is a sharper turn over the south west area of Bishop's Stortford. This area has seen a large population increase in recent years and two of the town's largest secondary schools have announced plans to jointly relocate on a site in this neighbourhood and would be adversely affected by this new NPR. During the consultation period, NATS has proposed, without commitment, an optional new route which would take departing aircraft a little further south west of both the existing and the proposed new NPR. While this might meet the concerns of Bishop's Stortford, it would have an adverse impact on the village of Much Hadham and, to a lesser extent, the town of Sawbridgeworth.

It is not clear why these two new NPRs are needed. It appears that aircraft departing on these two routes from Stansted Airport have to climb as quickly as possible by heading towards the north east before they turn to the west, presumably to be above Luton outbound traffic. Clearly it would be preferable to leave the current NPR routes in being, especially since it is also proposed that Luton outbound traffic will now be routed over the Bishop's Stortford area.

9. For all the six NPRs departing from Stansted airport, the use of P-RNAV is welcomed in helping to ensure consistent good track keeping performance. SSE proposes that NATS should consider reducing the width of the 3km NPR swathe and also increasing the vectoring height from 4,000ft to 5,000ft.
10. While NATS has not been able to provide figures for track accuracy using P-RNAV, it is understood from anecdotal evidence from pilots using Stansted Airport that track accuracy of the order of  $\pm\frac{1}{3}$  mile is possible. SSE proposes that NATS should investigate and consult on the possibility of aircraft being able

to concentrate or disperse across the NPR swathe, thus providing possible relief for people living under these very noisy routes.

11. NATS has used a 'slow' time response for calculation of the Lmax peak noise values throughout the consultation document to show the potential loudness of individual aircraft on the proposed changed routes. This deviates from the World Health Organisation Guidelines for Community Noise which use a 'fast' time response setting for Lmax measurements. The significance of this is that values using a 'slow' setting can be lower than those using a 'fast' setting by as much as 10 decibels. Hence all the Lmax values given for the individual aircraft at the various heights can be assumed to be understated by NATS.
12. NATS has used the Leq 16-hour metric for the 57 dBA contours and, in the case of Stansted Airport, the population count is predicted to increase (see paragraph 4 above). NATS has not used the Lden 24-hour metric required by the Environmental Noise Directive. Had NATS done so, this would have shown a larger population increase as illustrated by the comparison table for Stansted Airport Strategic Noise Maps 2006 below

Parameter	Contour Band (dBA)	Area Affected (sq km)	Population (000s)	Households (000s)
16-hour day Leq	55 - 59.9	26.1	3.7	1.5
24-hour Lden	55 - 59.9	44.9	7.8	3.2

13. NATS has not provided any night noise information. This omission makes it difficult for communities to assess the effects of sleep disturbance as a consequence of the proposed changes. This will be particularly relevant where new routes are flown over tranquil areas.

Overall, SSE does not support the NATS' proposal for the reasons given above. SSE is also opposed to the expansion of airport capacity on the grounds of unsustainability, and it is therefore opposed to any changes that are designed to accommodate unsustainable expansion. With the exception of the introduction of Continuous Descent Approach (CDA) for Stansted Airport easterly runway, SSE believes that the case has not been sufficiently made to implement the proposed changes. With regard to direct flight paths or specified routes, SSE believes that a degree of dispersal is a better compromise above 4,000ft.

Yours faithfully



Peter Sanders  
Chairman

cc Sir Alan Haselhurst MP  
Mark Prisk MP