

SSE response to NATS Departure Route Proposal at Stansted Airport

1. Introduction

1.1 Stop Stansted Expansion ('SSE') was established in 2002 in response to Government proposals for major expansion at Stansted Airport. We have some 7,500 members and registered online supporters including 150 parish and town councils and local residents' groups and national and local environmental organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.

1.2 SSE welcomes the opportunity to respond to this NATS proposal to switch daytime flights (6am to 11pm) from the existing south-east (Dover) departure routes to the existing east (Clacton) departure routes. As background information, Stansted Airport is currently operating at half its permitted capacity.

1.3 SSE notes that this proposal is part of the London Airspace Management Programme ('LAMP') which is being addressed in two main phases and that the main development of airspace for Stansted will come in LAMP Phase 2 currently scheduled for 2018/19 and is expected to involve a significant redesign of the Stansted routes.

1.4 Additionally, the Airports Commission has published its Interim Report with proposals on runway capacity in the UK and will be submitting a final report in the summer of 2015 after which the Government will subsequently make its decision. This NATS proposal does not take into account any potential development of an additional runway at any London airport. As a result there may be further changes to Stansted airspace.

2. SSE's understanding of the NATS proposal

2.1 NATS says that the benefits of the proposed change are:

- Reduced CO₂ emissions
- Reduced delay for Stansted Airport and neighbouring airports
- Reduction in the number of people regularly overflown during the day

2.2 NATS says that reduced delay is achieved by switching traffic to the Clacton route since currently, during the day, approximately 85% of Clacton departures achieve continuous climb operation compared with approximately 10% of Dover departures.

2.3 NATS has set a baseline of 2012 for traffic levels, fuel burn savings, CO₂ emission savings and population and household counts.

2.4 NATS has focused on local environmental impacts below 7,000ft.

3. SSE's analysis of the NATS proposal

3.1 Reduced CO₂ emissions

3.1.1 By switching from the Dover to the Clacton route, the annual reduction in CO₂ emissions stated in the proposal¹ compared with the total annual CO₂ emissions of about 1.1 million tonnes for all aircraft operating at Stansted in 2012 would result in a saving of less than 1%. If the 20% and 40% traffic growth figures included a proportion of long haul routes, the saving would be even less.

3.2 Reduced delay for Stansted Airport and neighbouring airports

3.2.1 NATS has previously said that 2012 was the lowest year on record for air traffic control delays in the UK attributable to NATS². The delays averaged just 1.6 seconds per flight in 2012 and 99.8 per cent of UK flights did not suffer any NATS air traffic control delay.

3.2.2 NATS says reduced delay would be achieved by increased use of continuous climb on the Clacton route compared with the Dover route but does not say what reduction in delay would be achieved. However, the Government's guidance is that continuous climb is considered to have an overall neutral impact on noise. It involves the redistribution of noise, with more noise at the beginning of the flight and less noise further away from the airport³.

3.3 Reduction in the number of people regularly overflowed during the day

3.3.1 Below 4,000ft, while 1,470 fewer people would be overflowed, 2,400 people would be overflowed more intensively. Compared with 2012, there would be double the number of flights on the Clacton route and quadruple the number of flights were Stansted to expand to its permitted capacity.

3.3.2 No information is provided for people overflowed by aircraft between 4,000ft and 7,000ft other than NATS' statement that there would be a reduction in the overall area regularly overflowed below 7,000ft.

3.3.3 Up to 7,000ft under the Clacton route, flights would double out to Kelvedon (20 miles from the airport). Up to 7,000ft under the Dover route, flights would be negligible out past Rochester in Kent (40 miles from the airport).

3.3.4 People living under the Dover route would still be overflowed at night. Aircraft noise complaints at Stansted Airport in 2012 for the night quota period represented some 20% of all complaints in the year. In 2012 there were 8,116 night quota period movements at Stansted Airport which was less than 6% of the total annual number of movements. There is a disproportionately high incidence of complaints about night flights. The proposed change would not bring relief to anyone between 11pm and 6am, including those under the Dover route who would not experience the relief they might expect.

3.3.5 While there would be no change to flights near Areas of Outstanding Natural Beauty, the proposal would bring more traffic closer to the southern boundary of Hatfield Forest which had approximately 425,000 visitors in 2012. Hatfield Forest is a National Trust property and a Site of Special Scientific Interest and the UK's best remaining medieval royal hunting forest.

¹ NATS Departure Route Proposal, Table 3: Fuel savings

² NATS News Release dated 28 January 2013

³ DfT Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions, January 2014, para 4.5

3.3.6 Long term stability has been a key principle for the design of departure routes from airports. The doubling of flights on the Clacton routes would be a major change to the current usage. DfT environmental objectives give guidance to the CAA to minimise harm to the environment and, inter alia, state that they should be “*Forward looking - by taking account of likely future as well as current planned operations, with a view to delivering stability in airspace arrangements as far as practicable*”⁴

3.3.7 No information is given on noise levels – either for aircraft noise or for ambient noise levels against which aircraft noise events could be compared for the intensification on the Clacton route. SSE is particularly concerned that the operation of Stansted Airport – which, since its inception, has been known as ‘*the Airport in the Countryside*’ – should be environmentally sustainable especially bearing in mind the largely rural location where local communities are otherwise able to enjoy a good quality of life, partly as a result of low ambient (background) noise levels.

3.3.8 The proposal cannot be assessed in the context of the whole LAMP programme which apparently involves a significant redesign of the Stansted routes which could further intensify flights over Hertfordshire and Essex. In 2008, this was exactly the case when NATS proposed major airspace changes over six counties and 12 million people north of the Thames. In the event, 86% of consultees opposed these changes and they were not implemented. The reason given at the time was that they would be addressed in a future proposal which has now become the LAMP programme. NATS said then that “*the number of options available to us is extremely limited in this airspace, which is some of the most complex and congested in the world*”⁵

3.3.9 Finally the proposal does not include the implementation of Continuous Descent Approach (‘CDA’) for all easterly arrivals. Stansted is the only designated London airport without CDA implemented for both runway directions. CDA has the potential to reduce the noise, by up to 5 decibels, of arriving aircraft to the easterly runway from about 25 to 10 track miles from touchdown over a large area in Essex and Herts. This would have a significant benefit in noise reduction for local residents around Stansted Airport. It would also result in fuel savings and reduced CO₂ emissions

4. SSE’s position

4.1 For people living near Stansted Airport and under flight paths, there would inevitably be winners and losers if this change were to be implemented. SSE’s position is:

- Long term stability is essential. People choose where to live based upon a reasonable expectation of likely future developments and the long term stability of land use planning.
- There must be clear and compelling benefits for local residents before any changes are implemented.
- The proposed change shows negligible improvements for both CO₂ emissions and flight delays.
- For communities living under the departure flight paths out to 20 miles from Stansted Airport, the proposed switching of routes would result in more people being overflown more intensively compared to those for whom overflights would become negligible.
- People living under the Dover route would still be overflown at night.

⁴ CAA Guidance on the Application of the Airspace Change Process CAP 725, para 22c

⁵ NATS News Release dated 23 February 2009

- Any benefits of the proposed switching of routes would be gained by the airlines in efficiencies and by people living much further away from the airport in an area to the south towards Rochester and only where aircraft are currently held down to 7,000ft on the Dover route.
- The Government recognises that noise is the primary concern of local communities near airports and that, as a general principle, the benefits of noise reduction should be shared between the aviation industry and local communities by striking a fair balance between the negative impacts of noise and the positive economic impacts of flights⁶.

4.2 SSE opposes the proposal on the basis that:

- It offers negligible benefits.
- It has adverse noise impacts overall for the local community living within 20 miles of the airport under the flight paths below 7,000ft.
- It breaches the concept of delivering long term stability for local residents by introducing a step change of doubling traffic levels on the Clacton route.
- It does not strike a fair balance of noise reduction benefits for the local communities near Stansted Airport.
- It cannot be assessed in the context of the next LAMP phase which is expected to involve a significant redesign of the Stansted routes and for which no information is available.

4.3 SSE strongly recommends that this proposal is postponed until LAMP Phase 2 when significant airspace changes are expected to be proposed for Stansted, especially after the Government has made its decision on the Airports Commission's final report. This would enable this proposed change to be properly assessed in the context and knowledge of the whole airspace plan for Stansted. It should include tangible environmental benefits for local residents and incorporate implementation of Continuous Descent Approach for all arriving aircraft to the easterly runway at Stansted Airport and other possible operational or technical improvements currently in the pipeline.

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⁶ Aviation Policy Framework, March 2013, paras 3.2 and 3.3