

NATS STANSTED AIRPORT DEPARTURE ROUTE PROPOSAL CONSULTATION

SSE's POSITION AND RECOMMENDATIONS

INTRODUCTION

The NATS proposal involves switching daytime flights (6am to 11pm) from the existing south-east (Dover) departure routes to the existing east (Clacton) departure routes. These Dover and Clacton routes account for half of all departures from the airport. Departure routes to the west of the airport and all arrival routes are not affected by this proposal and remain the same.

NATS says that the result would reduce the overall number of people regularly overflowed in the day as well as reducing CO₂ emissions. In addition, NATS says that switching to the Clacton route would allow aircraft to achieve a more continuous climb than possible on the Dover route leading to more efficient operation.

BACKGROUND INFORMATION

Stansted Airport is currently operating at half its permitted capacity.

This consultation is part of a wider programme to modernise airspace over the south east of England known as the London Airspace Management Programme ("LAMP") and is being consulted upon in phases. NATS say that a later LAMP phase in 2018/2019 will propose a significant redesign of the Stansted routes together with airspace changes for Heathrow, Northolt and Luton. This present consultation also does not take into account any potential development for an additional runway at any London airport. The consultation closes on 8 September 2014 and any changes arising would not be implemented before winter 2015.

In July, SSE published its Guidance on this NATS consultation including details of how to respond which can be found via link: http://sse.rifledesign.co.uk/wp-content/uploads/2020/04/SSE_GUIDANCE_FOR_NATS_DEPARTURE_ROUTE_PROPOSAL_Final.pdf

REASONS GIVEN FOR THE PROPOSED CHANGE

NATS says that the benefits of the proposed change are:

- Reduced CO₂
- Reduced delay for Stansted and other airports
- Reduced number of people regularly overflowed during the day

SSE's ANALYSIS OF THE PROPOSED CHANGE

Reduced CO₂

- The reduction in overall CO₂ emissions is negligible – less than 1%.

Reduced delay

- Reduced delay is achieved by continuous climb on the Clacton route.
- 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 airport.
- Delays are very small; 2012 was the lowest year on record for ATC delays in the UK attributable to NATS, averaging just 1.6 seconds per flight.

Reduced number of people regularly overflown in the day

- Below 4,000ft, while 1,470 fewer people would be overflown, 2,400 people would be overflown 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.
- No information is provided for people overflown by aircraft between 4,000ft and 7,000ft other than NATS' statement that there would be a reduction in the overall area regularly overflown below 7,000ft.
- 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 become negligible out past Rochester in Kent (40 miles from the airport).

ADDITIONAL ISSUES

- There is no published overall Master Plan which shows how the airspace around Stansted Airport will be affected by a later LAMP phase for the London airports. Therefore this present proposal cannot be judged in the context of the whole LAMP programme.
- The later LAMP phase could further intensify flights over Herts and Essex. In 2008, this was exactly the threat 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 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"*
- Furthermore, the Airports Commission has proposed a new runway in the south east of England and is due to publish its final report and recommendations after the general election in May 2015. There may be further airspace changes as a result of this work and the subsequent decision by the Government.
- Long term stability has been a key principle for the design of departure routes from airports. While it is not proposed to reposition Noise Preferential Routes, 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. Arising from which CAA, inter alia, states 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"*¹
- There is no change proposed for night operations (11pm to 6am) when the Dover route would continue to be used. Aircraft noise at night gives rise to proportionally more complaints.
- Not included in this NATS proposal is the implementation of Continuous Descent Approach for all arrivals to Stansted's easterly runway. This would provide a greater noise reduction benefit throughout Herts and Essex. It has the potential to reduce noise from about 10 to 25 track miles from the airport under the arrival flight paths by up to 5 decibels. It would also result in fuel savings and reduced CO₂ emissions.

¹ CAA Guidance on the Application of the Airspace Change Process CAP 725, Appendix B, Airspace Change Proposal – Environmental Requirements, para 22c

SSE's POSITION

SSE has commented earlier that for people living near Stansted Airport and under flight paths, there would inevitably be winners and losers if this change were to be implemented. Nonetheless, 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.
- The proposed change shows negligible improvements for both CO₂ emissions and flight delays.
- Overall, 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 where aircraft are currently held down to around 7,000ft on the Dover route.

SSE's RECOMMENDATIONS

SSE concludes that it should recommend opposing the proposed change 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 cannot be assessed in the context of the next LAMP phase which will involve a significant redesign of the Stansted routes.

SSE is recommending that this proposed change is postponed until the next LAMP phase when significant airspace changes will be proposed for Stansted and after the Government has made its decision on the Airports Commission's final report. In so doing, the proposed change would be able to be assessed in the context of the whole airspace plan and include Continuous Descent Approach for all arriving aircraft to the easterly runway.

6th August 2014

LIST OF ABBREVIATIONS

SSE	Stop Stansted Expansion
NATS	formally National Air Traffic Services, the main air navigation service provider in the UK
DfT	UK Department for Transport
CAA	UK Civil Aviation Authority
LAMP	London Airspace Management Programme