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23 February 2015

Safety and Airspace Regulation Group  
The Civil Aviation Authority  
CAA House  
45-59 Kingsway  
London WC2B 6TE

For the attention of the Airspace Business Coordinator – Airspace, ATM and Aerodromes

Dear Sirs

**Re: NATS Stansted Departure Route Proposal Consultation**

I am writing on behalf of Stop Stansted Expansion ('SSE') in relation to the NATS Departure Route Proposal at Stansted Airport ('the Proposal').

SSE represents 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.

SSE responded to the NATS' consultation and a copy of our response is attached for your reference and information. SSE opposed the Proposal on the basis that:

- It offered negligible benefits.
- It had adverse noise impacts overall for the local community living within 20 miles of the airport under the flight paths below 7,000ft.
- It breached the concept of delivering long term stability for local residents by introducing a step change of doubling traffic levels on the Clacton route.
- It did 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 London Airspace Management Programme (LAMP) phase which is expected to involve a significant redesign of the Stansted routes and for which no information is available.

It is noted that NATS received over 400 responses to its consultation and more than 82% of those who expressed a view objected to the Proposal.

The purpose of this letter is to express our dissatisfaction with the NATS' consultation and, in line with the CAA's responsibilities for overseeing the process of Airspace Change, to draw your attention to its shortcomings.

*Patron: Terry Waite CBE*

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

The environmental impacts of the Proposal mostly affect residents living around Stansted Airport. 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 flights<sup>1</sup>.

NATS originally said that the three benefits of the Proposal<sup>2</sup> were:

- Reduced CO<sub>2</sub> [emissions]
- Reduced delay for Stansted Airport and neighbouring airports
- Reduction in the number of people regularly overflown during the day

NATS now claims that *“the overall package of net operational and environmental benefits makes a compelling case for this change”*<sup>3</sup>.

First, while SSE acknowledges that the Proposal will reduce CO<sub>2</sub> emissions, we maintain that the reduction is small (less than 1%) when compared to all flight operations at Stansted. We do not accept NATS’ argument that the saving should only be assessed in relation to a very small length of flight restricted to a short segment of departure. Any saving must be judged in the context of the total amount of CO<sub>2</sub> emissions caused by the whole flight. That is the proper basis for assessing aviation greenhouse gas emissions and their effects on climate change.

Second, NATS has not provided any actual or forecast figures for reduced delays to support the claimed benefit. It is therefore not possible to assess this claimed benefit and it is wholly unacceptable merely to assert *“If we did not make such changes, delays would increase rapidly as traffic grows”*<sup>4</sup>.

Third, NATS only provides figures for the number of people overflown below 4,000ft. While 1,470 fewer people would be overflown, 2,400 people would be overflown more intensively. Under the flight paths around Stansted Airport, there is no doubt that residents overall would experience more overflying and associated noise exposure from the proposed change. It is wholly specious for NATS to now present ‘weighted’ numbers in its Feedback Report attempting to disguise the adverse impact by the historic usage of each runway. Residents either live under a departure flight path or they don’t. 70% long term historic usage of Runway 22 is immaterial since runway direction changes all the time and Runway 22 usage can be lower than 50% in some months. For instance in March 2013, Runway 22 usage was 18%. We maintain that it is quite wrong to weight the actual numbers of people being overflown by this artifice.

Furthermore, people living under the Dover route would still be overflown at night. The Government recognises that *“the costs on local communities are higher from aircraft noise during the night, particularly the health costs associated with sleep disturbance. Noise from aircraft at night is therefore widely regarded as the least acceptable aspect of aircraft operations”*<sup>5</sup>. 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

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<sup>1</sup> Aviation Policy Framework, March 2013, paras 3.2 and 3.3

<sup>2</sup> NATS Consultation Summary Leaflet

<sup>3</sup> NATS Feedback Report, 14 November 2014, para 5.18

<sup>4</sup> NATS Feedback Report, 14 November 2014, para 5.17

<sup>5</sup> Aviation Policy Framework, March 2103, para 3.34

complaints about night flights. The Proposal 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. This fact is not mentioned anywhere in the Feedback Report and further erodes the claimed benefit.

While SSE recognises that Continuous Climb Operation is an operational improvement with the potential to reduce fuel burn and CO<sub>2</sub> emissions, the Guidance to the Civil Aviation Authority on Environmental Objectives states that it "*is considered to have an overall neutral impact on noise, but it does involve the redistribution of noise with more noise at the beginning of the flight and less noise further away from the airport*"<sup>6</sup>. Aircraft on the Dover route overflying the communities in south Essex and Kent straddling the Thames are currently generally being 'held down' at levels of around 7,000 feet or higher. Therefore reduced overflying, which would benefit these communities, currently takes place at relatively higher altitudes compared with flights closer to the airport. Overflying at higher altitudes causes less noise annoyance and the Government guidance states that "*in the airspace above 7,000 feet ..... mitigating the impact of noise is no longer a priority*"<sup>7</sup>.

Finally, we consider that NATS should have declared its interest in the Proposal. NATS Ltd is a wholly owned subsidiary of NATS Holdings Ltd which is 41.9% owned by The Airline Group Ltd, a consortium of eight airlines. The remaining shares are held by LHR Airports Limited (4.2%), NATS employees (5.0%) and the Government via DfT (48.9%). The Airline Group Ltd has the majority of the voting rights. The shareholder objectives (agreed by the Airline Group, LHR Airports and DfT) are:

- *Maintaining (and where appropriate enhancing) NATS' safety performance and culture;*
- *To provide over the long term a risk-adjusted commercial return to NATS' shareholders through:*
  - *efficiently and cost effectively providing air traffic services that meet the reasonable requirements of customers in terms of reliability, capacity and delay;*
  - *investing efficiently and cost effectively in appropriate air traffic control (ATC) infrastructure to be able to deliver those services;*
  - *pursuing strategic commercial growth opportunities in the UK and overseas ATC markets, including European.*

While the objectives relate to safety, financial performance and efficient services for airspace users, there are no environmental objectives. This should have been made clear in the Proposal.

It is SSE's opinion that, for the reasons given above, the NATS' consultation is flawed and the figures presented by NATS are not fair or accurate. These shortcomings in the application of the Process need to be satisfactorily resolved before a Regulatory Decision can be made.

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<sup>6</sup> Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions, January 2014, para 4.5

<sup>7</sup> Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions, January 2014, para 4.1d

I am copying this letter to Sir Alan Haselhurst MP who is following this issue closely.

Yours faithfully

A handwritten signature in cursive script that reads "Peter Sanders". The signature is written in black ink and is positioned to the left of the printed name.

Peter Sanders  
Chairman

Enc.  
cc Rt. Hon Sir Alan Haselhurst MP