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## **STANSTED AIRPORT DEPARTURE ROUTE TRIALS CONSULTATION**

Stop Stansted Expansion ('SSE') welcomes the consultation on the results of improved track keeping trials within two existing departure routes from Stansted Airport. These routes, known as Noise Preferential Routes, are the departure routes 22 Clacton and 04 Detling (previously called 04 Dover).

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.

The Government's policy is to limit, and where possible reduce, the number of people in the UK significantly affected by aircraft noise. While the trials do not give rise to a reduction in the amount of noise emitted by each aircraft, they have shown that it is possible to reduce the width of the swathe in which aircraft depart from the airport.

SSE's general position on flight paths is that priority should be given to maintaining long term stability and that flight paths should only be changed where there are clear and compelling benefits for the local community. When flight paths are changed there will inevitably be winners and losers. However SSE supports efforts that reduce the number of residents suffering from aircraft noise annoyance, provided this does not give rise to disproportionate and unbearable noise impacts upon the minority of 'losers'.

Overall, SSE supports the improvements in track keeping evidenced by the trial results and supports an airspace change proposal to permanently implement the trial procedure for all aircraft on these two departure routes.

However, since only a small proportion of aircraft departing on these two routes are currently using the trials procedure, the trial is not a complete assessment of the resulting effects. SSE wishes to ensure that the anticipated noise benefits are delivered by all aircraft using the routes before the trial procedures are permanently adopted. It is now of public record that there is considerable disquiet amongst local communities living around Heathrow, Gatwick and other airports over the introduction of Performance Based Navigation ("PBN") and concentrated flight paths. Therefore SSE qualifies its support with the need for a Post Implementation Review ("PIR") as set out in CAP 725 CAA *Guidance on the Application of the Airspace Change Process* to establish and assess the noise levels for local residents living under the concentrated route centre lines. It may be that other mitigation or compensation is necessary and/or that subsequent modifications

*Patron: Terry Waite CBE*

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

are needed to the RNP1 (RF) concentrated routes used in the trial of the PBN flight paths at Stansted.

It is understood that Stansted Airport is developing alternative noise metrics which better represent the noise impacts for an airport in rural surroundings with low background noise levels. This initiative is welcomed and one of the first uses should be to measure and assess the resultant noise impacts as part of the PIR. The N70 "Number Above" metric lends itself as a useful candidate for this task and it is also proposed by the Airports Commission for the "Noise Scorecard". It directly represents an assessment of the noise level of each flight and the number of flights as clearly audible events. With appropriate thresholds, it would establish levels for disproportionate and unbearable noise annoyance and sleep disturbance under the centre line of the concentrated routes. For Stansted, in rural surroundings, it needs to be used in conjunction with measured L90 background noise levels.

We have no objection to our response being included in the consultation feedback report.

Yours sincerely

A handwritten signature in cursive script that reads "Peter Sanders". The signature is written in dark ink and is positioned above the printed name.

Peter Sanders