

Item 4

NATS Proposed Changes to Airspace Consultation

- I. This is the response of Uttlesford District Council to NATS consultation document on proposed changes to airspace in Terminal Control North.
- II. The Council is concerned about the principle of making changes to airspace management arrangements in a sector that NATS acknowledges is the busiest and most complex in the world, in order, in part, to enable the handling of even more movements. The Council considers that NATS should advise the CAA and the government that a cap should be placed on movements in the Terminal Control North zone and that, within that cap, the objectives should be limited to reducing intrusion from aircraft noise, minimising emissions of greenhouse gases and ozone depleting substances, and improving local air quality.
- III. In a rural area like Uttlesford, ambient noise levels are low and therefore aircraft even at 7,000 to 8,000 feet have the potential to be disturbing with adverse effects on the tranquillity of this attractive rural area rich in cultural and heritage assets. The routing of departure routes over the district, particularly those which currently do not overfly Uttlesford, is therefore viewed locally as a detrimental development. The following schools will be under or close to the departure swathes for the first time
 - Easterly departures : Wimbish Primary School, Radwinter Primary School and further out Chrishall Primary School
 - Westerly Departures: Farnham Primary School and further out Manuden Primary School, Clavering Primary School, and Chrishall Primary School.
- IV. Whilst appreciating the complexities of the potential interactions between arrangements, it is regretted that the proposals are presented as a set of measures that are near to finalisation, only with limited scope for adjustment to take into account local factors where circumstances permit. It is difficult to meaningfully engage with the development of the proposals when what NATS seeks, in effect, is endorsement. Some limited examples are given of why NATS dismissed options and chose a particular alignment. Those most relevant to Uttlesford are the Options for Stansted Easterly Departures to the South West figure G51. We have no way of gauging whether safety considerations constrain choices in the way that the consultation document suggests.
- V. Significant weight should be attached minimising intrusion from aircraft noise, as some people are annoyed or highly annoyed where aircraft noise is below 57 dB 16 hour Leq. The government has acknowledged that the number of people experiencing that response for a given noise dose has increased over time. That

point was accepted in its statement when it published the ANASE report. At the same time, the package of proposals must also contribute to minimising emissions.

- VI. It is acknowledged that the new arrivals arrangements are expected to result in arriving aircraft generally being at higher altitude over the district when descending to final approach than at present, but the benefit is lost with increased movements.

- VII. Given that a high priority for the Council is to establish conclusively the environmental effects of BAA's G2 proposals, it is also of concern to learn that further changes would need to be introduced to handle the 495,000 ATMs BAA expects at 68 mppa, and that BAA's Environmental Statement is based on a "G2 Best Estimate Airspace Design supplied by NATS". Proposed changes would actually take place independently of the G2 proposals.

- VIII. The extension of the consultation period by one month has not addressed the Council's concerns about community involvement in these major changes. NATS is formally requested to extend again the consultation period, this time for a significant period and to enter into full consultation on all options, including those already dismissed by NATS, the consultation to include public meetings, exhibitions and information provided directly to all affected households, and to make clear that comments by letter would be welcomed, and that a name and address for the receipt of these comments be published. The Council will communicate its concerns about the consultation arrangements to the Directorate of Airspace Policy at the CAA and ask it to direct NATS to expand the consultation.

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