



UTTLESFORD DISTRICT COUNCIL

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9 September 2014

Our ref: NATS / JGP

Please ask for Jeremy Pine on 01799 510460
email: jpine@uttlesford.gov.uk

Dear Sirs

RE: NATS DEPARTURE ROUTE PROPOSAL AT LONDON STANSTED AIRPORT

Thank you for the opportunity to comment on this consultation. This is the Council's reply, which has been compiled following a review by the Stansted Airport Advisory Panel.

There is no "win-win" situation for local residents when a change such as this is being proposed. As a result, extreme care must be taken in making a judgement about the merits or otherwise of this proposal. It appears that the main motive for the change is congestion reduction/airspace efficiency improvements in the London Terminal Manoeuvring Area rather than improving the living environment for local residents.

In the Aviation Policy Framework (APF), the Government says that it wants "*to strike a fair balance between the negative impacts of noise (on health, amenity (quality of life) and productivity) and the positive economic impacts of flights*" (Paragraph 3.3). In Paragraph 3.12, the Government states that its overall policy on aviation noise is "*to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise*". Under this proposal more people would experience more overflying than the number who would experience less and the Council is also very concerned about the effect of increased overflying of Gt Easton Primary School from the more than doubling of the number of departures on the Runway 04 Clacton SID. Further along this same departure route there are also concerns about increased noise being experienced at primary schools in Stebbing and Felsted. On Runway 22 departures, increased use of the Clacton SID would bring more aircraft in closer proximity to the southern edge of Hatfield Forest than is currently the case.

NATS and London Stansted Airport should therefore clearly explain to the CAA how this proposal would comply with Government policy in the APF and its guidance on environmental airspace design objectives. If this proposal is to be implemented, there should be as a minimum a prior examination of whether the use of performance based navigation could reduce the effect on the primary schools by either finding an optimal path within the Clacton 04 NPR swathe or by practicing dispersal.

There may be wider benefits of this proposal from improved fuel efficiency, reduced CO² emissions (albeit very small – less than 1%), reduced passenger delays and reduced congestion in London airspace. It is not clear, however, how these benefits are to be

weighed against Government policy and guidance on mitigating noise impacts below 4,000ft. In country areas such as Uttlesford, aviation noise is more acutely felt because of the low background level of ambient noise. The proposal would have no effect on night noise, nor would it enable continuous descent on the Runway 04 approach, which would be the most beneficial of all the operational changes. There would, of course, be less overflying of residential areas in South Essex and North Kent, but the noise benefit would be less because the aircraft are higher in those locations.

The Council is aware of advice on continuous climb operations contained in Sustainable Aviation's Noise Road Map: (Paragraph 4.6.1): *"it is likely that the effects of continuous climbs on noise profiles are small as their effect can be some distance from the airfield and at altitudes where the noise change may not be perceptible. There may nevertheless be localised opportunities where noise benefit can be derived and these should be pursued where appropriate. The greatest manifestation of continuous climbs is likely however to be in their scope for significant reductions in fuel burn and CO² emissions"*.

The Council notes that these proposals are able to be implemented in advance of the LAMP Phase 2 programme in 2018-19. No information is currently available on what the Phase 2 changes will entail, and the Council questions the point of implementing these proposals now in advance of LAMP Phase 2. The Council is concerned that these proposals could act as a precedent for accepting revised protocols in LAMP Phase 2 on the basis that they have already been implemented.

The Council's overall conclusion is that, in advance of LAMP Phase 2, there is merit in the status quo.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J Cheetham', written in a cursive style.

Councillor Jackie Cheetham
Cabinet Member with Responsibility for Aviation