

Felsted Parish Council
Parish Council Office
URC Hall
Stebbing Road
Felsted
CM6 3JD
7th August 2014

Stansted SID Airspace Consultation
Box 25A,
4000 Parkway
PO15 7FL

Dear Sir/Madam

Re: NATS consultation 'Departure Route proposal at London Stansted Airport'.

We write to object in the strongest terms to the proposal to reroute flights currently using the 'Dover' route onto the 'Clacton route', as detailed in the above referenced consultation.

We want to firstly make it clear that this is not a NIMBY response. We are objecting to the diversion of flights from using the Dover route to using the Clacton route on the grounds that the benefits are based on the **selective, biased, and questionable use of statistics and that the impact from the changes has been understated, with important aspects overlooked.**

Furthermore, the consultation process does not consider or tolerate alternative options and is wholly inadequate and inconsistent with the level of detail and consultative information sought and offered when compared to other parts of the LAMP proposal.

We strongly believe that this proposal should be dismissed as misleading in its presentation and detail, erroneously considered and an ill-conceived plan ignoring other potentially more appropriate and beneficial options.

The proposal claims 3 key benefits from the rerouting of flights.

1. Reduced CO₂
2. Reduced delay (for Stansted and neighbouring airports)
3. Reduction in the number of people regularly overflown during the day

We believe these are points are either incorrect, overstated, or inadequately supported with information, as detailed below.

1. 'Reduced CO₂'

The NATS document (ref 1 p29 table 6.25) quotes an absolute minimum reduction of **CO₂ of 6,400T. This is under a heading for '2012 traffic grown by 20%'**. Why is this reference point being set against a future forecast of increased flight numbers? Why not against the datum point set for all other references, at 2012? One can only assume this is to make the saving appear at first glance as large as possible?

However, it is possible, with some detective work, to evaluate the true saving (why should it be necessary to seek out the true information from other sources?).

The official figures for 2012 CO₂ production, according to the Stansted Annual report (ref 2), is 408,066 tonnes. This however only includes the Landing and Take Off cycle (LTO at 181,056 tonnes) and does not include the cruise segment. Table 2 of the GHG emissions estimates submitted by Stansted Airport in 2008 in support of its G2 application for a second runway show that, for 2006, cruise emissions are 5.3 times LTO emissions. For 2015 this was estimated at 10 times, on the assumption of more long haul traffic. If we take the lower 2006 multiple estimate then the **total production of emissions is 408,066 + (181,056 x 5.3), or 1,367,662 tonnes.**

If we take the stated minimum saving of 6,400 and take that back to actual 2012 savings (i.e. remove the 20% uplift by dividing by 1.2), then we get a 5,333 tonnes, **or a 0.4%, saving**, even at the top end of estimates the savings are only 0.8%.

Once you see how small the saving is in percentage terms, it becomes clear why the proposal document does not provide this information. A figure this small is a variation within the limitations of statistical reliability and validity (variation and measurable error); **there is therefore no statistically valid argument for any saving in CO₂ production from this proposal.**

2. 'Reduced delay (for Stansted and neighbouring airports)'

This statement is neither qualified nor supported with specific data. It is simply presented as an 'it must be true' statement. **Where is the proof and data to back this assertion?**

The consultation document (ref 1) argues that a key reason to move flights from the Dover route to the Clacton route is to avoid Heathrow routes. Page 14, fig 3, shows that Stansted's Dover routes cross over both incoming and outgoing Heathrow routes. However, page 15, fig 4, illustrating the resulting routes from the

proposed changes, shows that these **planes will still cross over both arrival and departure routes for Heathrow, just a little further out. These are defined routes with defined heights for flights. Why should moving the intersection of these flight paths out by a few miles change delay times?**

Fig 3 also clearly illustrates that **if Stansted's current Dover route were diverted to head east earlier, then it could take a route out along the Thames into open sea, avoiding both the Heathrow departure route completely, and avoiding overflying Kent.** It is evident that this is not being proposed because it would require a change in a flight path and so a more detailed review and consultation process. It is therefore **laziness** that has resulted in this proposal being presented as the **only** way to improve efficiency. **Where is the consideration of alternatives?**

3. 'Reduction in the number of people regularly overflowed during the day'

Simple analysis of the data included in this proposal (ref 3) demonstrates that for those most affected, (i.e. overflowed by flights below 4000 ft.), **this statement is simply untrue.**

The document states that 1470 fewer people would be overflowed below 4000 ft. whilst 2400 people would be overflowed more intensively, **a 63% increase in people regularly overflowed below 4000ft:** the height where noise is at its most disruptive and defined by NATS own guidelines as the height where noise disruption should be of prime consideration to routing (Ref 1, 6.5) **'there is particular emphasis on noise impact below 4000ft'.**

Why is this increase not being raised as an aspect of concern rather than hidden away in an appendix and covered as a misleading 'benefit'?

The NATS summary leaflet (ref 4 and repeated below) indicates changes where land in a dotted area will see fewer flights, whereas areas indicated by a solid line would be subject to additional flights. The differences in the footprints covered by these 2 areas are significant, in the order of 7 times. So, under this proposal, **not only will the 2 Clacton routes see an increase in flights, with a 63% increase in those affected by flights under 4000ft, they will also be subjected to an intensity of 7 times the flight 'load' from these flights** compared to that currently experienced when they use the Dover route. This is on top of the flights already using the Clacton route.

Where is the analysis of the impact of increased air and noise pollution for these areas? There isn't a single reference to air pollution analysis, specifically NOX related pollution levels.

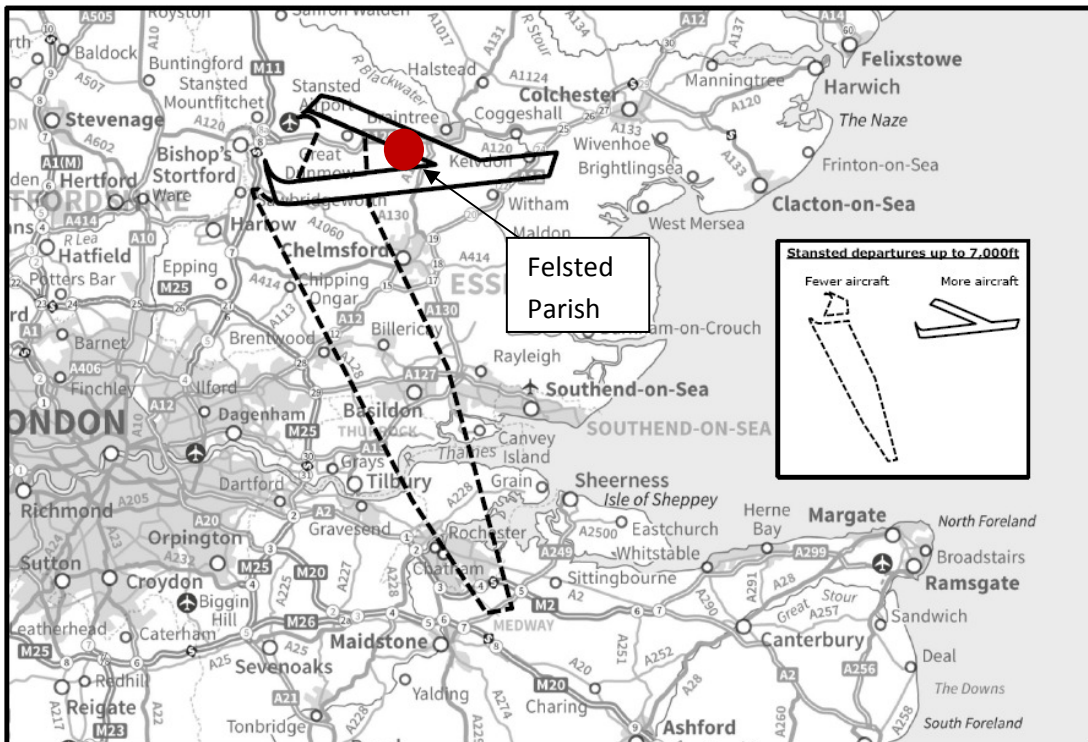


Figure 1 Stansted Airport Departures to the South and East - Proposed Areas of Change

Given that Stansted airport is currently operating at half its planned capacity, the area in Felsted Parish eventually overflowed will experience near-constant traffic every few minutes at 3000-7000 ft., which will be intolerable. No one chose to live in this quiet rural area knowing that there would be permanent and constant noise from low-flying aircraft. To move the usage of the existing flight path in this underhand way is totally unacceptable.

Additional comment

In addition to the above arguments, we believe that there are a number of factors which have not been considered in the proposal, and which demonstrate strong arguments against it. They are detailed below.

Assessing the impact of noise in rural areas

In a 2008 review of flight corridors, Jonathan Astill, Head of Airspace Management for NATS, is reported to have admitted that **the same level of aircraft noise was likely to cause more disturbance in the countryside than in towns**, because there was more masking background noise in towns.

Whilst it is recognised in this consultation process that more people will be more intensely overflown, no assessment has been carried out regarding the heightened impact of additional flights over smaller villages when compared to larger towns.

As part of a Public Enquiry in respect to a planning application in Station Road, Felsted in 2000, noise measurements were taken (ref 5). **A noise level of only 37dB** in Felsted was recorded in the enquiry documents. To relate this to other noises, a whisper is 20dB, a normal conversation 60dB, city traffic 80dB and an aircraft at take-off 100+dB.

So quiet is the Parish, that in the outlying 'Greens' Heathrow flights at over 18,000ft are noticeable from the noise they make. This area is already extensively overflown at slightly higher levels by planes from Heathrow, Luton, and Gatwick.

It is therefore unreasonable to assume that the impact from a flight at 4000-7000 ft. over a village is the equivalent perceived nuisance level to that experienced by people in a larger town.

It is therefore imperative that, before any consultation document can be properly considered, a full assessment of the true impact of the increase in noise, from the proposed increase in flights, which would be experienced by those living in areas impacted by the total move to the Clacton route, must be made.

The measures for nuisance assessment of noise also need to take into account the variations in the level of background noise, particularly considering the lower ambient noise levels in small villages.

Measuring the effects of concentrating pollution into fewer flight paths

The consultation document makes no assessment as to the health effects from higher concentrations of air pollution resulting from focusing flights into fewer and narrower corridors.

It is also very difficult to assess the real increase in the number of flights which will use the Clacton route. The reference point for the proposal takes 2 discrete weeks, one in June and one August. Why were these not taken from a broader time base?

The simplistic view, if you take the numbers from this consultation document, is that numbers of flights using the Clacton route will approximately double. However, there are no references here to peak flight numbers; **again full information is being restricted.**

The Stansted website (ref 6 & 7) details actual average and peak flight numbers. This illustrates that the 2 Dover routes currently experience peaks of 80 and 77 flights a day. Whilst it would be unlikely that the resulting peak diverted to Clacton routes would ever be the simple addition of these 2 peak numbers, it would not be unreasonable to

assume **an addition of over 100 flights a day, at peak periods, being diverted onto the Clacton routes**. With these flights focussed on 3 key periods in an operating day (early morning, early afternoon and evening), this will result in a flight every few minutes during sensitive periods.

Noting that Stansted is currently running at under half its planned capacity, the **potential impact of concentrating flights onto the Clacton routes begins to increase exponentially**.

The London Airspace Management Programme (LAMP)

This Stansted proposal is stated as being a part of The London Airspace Management Programme (LAMP) (ref 8). Their 2014 Stakeholder Organisations and General Public Consultation looked at rerouting scenarios for the South of England, specifically Gatwick, and asked a number of detailed questions of organisations and the public to determine the appetite for rerouting flights to optimise airport efficiency.

Why is this report not referenced as a source of recent public attitude to a proposal that bears great similarities to the Stansted proposal? Why has the Stansted proposal not been handled with a similar level of detailed consultation and questionnaires?

Two strong themes, which appear ignored in this Stansted phase of the LAMP proposal, came out of the report:

- To prioritise avoidance of sensitive areas over the benefits from direct flights with lower fuel burn and CO₂ (i.e. directly opposing the Stansted proposal), supported by Natural England.

Under question 15 responses:

"We would suggest that below 7,000ft, and definitely below 4,000ft, the emphasis should be on reducing noise. Above 7,000ft the emphasis should be on reducing emissions, but consideration will need to be given to mitigating impacts on noise sensitive areas such as protected landscapes". Natural England

The report then states: *'A smaller number, 28 respondents [out of 263, so only 10%], believed that direct flights with a lower fuel burn and CO₂ emissions should take precedence over the avoidance of environmentally sensitive areas.'*

- Consideration of sharing the impact from flight paths across multiple routes (with multiple flight routes and respite routes) rather than focusing it in one area (as is in the Stansted proposal), because of the benefits from lower concentrations of noise and air pollution.

Under question 11 responses, there were 492 members of the general public who answered the closed question (Part A) in the response form, relating to the proposal to realign all runway 26 departure routes below 4,000ft to make best use of the existing runway. There were **only 69 respondents (14%) who supported the proposal.**

These findings are all highly relevant in illustrating **the lack of public appetite for rerouting flights to the benefit of efficiency and the detriment of public spaces and impact on communities.**

These results do not support the Stansted proposal; presumably why they have not been included as relevant reference points for this part of the consultation.

If this is Phase 1, then why is the complete plan not being revealed for review?

The consultation document (ref 1) ref 3.11 states that 'no significant redesign of Stansted airport can be considered until Phase 2'.

From section 3.4 of the NATS proposal (ref 1):

"LAMP is therefore being addressed in phases to deliver not only short-term individual improvements, but also the best solution for the overall airspace system when all phases are complete."

Stansted's own noise strategy document (ref 9) says: "Changes in the NPR structure are rare and stability is regarded as important, so that people may know where aircraft noise will be experienced."

This proposal is clearly therefore part of a larger known plan. Why not disclose the full plan with the phases explained? It is impossible to fully evaluate or understand this proposal when we are only seeing a small part of it at a time, with no reference to what is planned next.

The impact on schools and children's education

There are 7 schools in the area of Felsted Parish, including 1000 pupils (many of whom are boarders and so in effect residents) at the independent Felsted School. There are also a significant number of other schools which would be impacted by these changes.

Much broad research has been carried out regarding the impact on children's learning from the noise and air pollution created by airports. However, this consultation document pays no consideration to, or attempts to analyse the impact upon, the schools

that will be subjected to increases in air and noise pollution as a result of increased flight numbers using the Clacton routes.

The consultation document only looks at households which will be subjected to increases in noise. With a significant percentage of the **1000 pupils at Felsted School living as boarders, they are in reality residents**, and, given the specific and dramatic effect of noise pollution on learning, **warrant a separate and specific review before any redirection of flights onto paths which encircle the Felsted Schools at sub 4000ft** are considered.

In conclusion, the selective, biased and questionable use of statistics within this proposal does not stand up to scrutiny.

The omission of relevant information, which does not support the proposal but would help those potentially affected to make accurate judgements, makes it clear that this consultation cannot be trusted to be a true summary of the potential impact on communities.

Furthermore, the consultation process does not consider or tolerate alternative options and is wholly inadequate and inconsistent with the level of detail and consultative information sought and offered when compared to other parts of the LAMP proposal.

We strongly believe that this proposal should be dismissed as misleading in its presentation and detail, erroneously considered, and an ill-conceived plan which ignores other potentially more appropriate and fairly-spread options.

We are also extremely concerned that this consultation has not been widely publicised, and is being held over a summer holiday period, when schools, organisations, and many individuals will not be available to respond.

Please confirm safe receipt of this submission

On behalf of Felsted Parish Council



D M B Smith
Clerk to the Council

References:

Ref 1:

http://www.nats.aero/wp-content/uploads/2014/06/NATS_Standed_Airport_Departures_Consultation_Main_Document.pdf

Ref 2: page 14

http://www.stanstedairport.com/media/4300/sustainability_report_2013__web_final.pdf

Ref 3: Appendix H of NATS consultation document.

http://www.nats.aero/wp-content/uploads/2014/06/NATS_Standed_Airport_Departures_Consultation_Appendix_H_Population_analysis_1.pdf

Ref 4: consultation summary

http://www.nats.aero/wp-content/uploads/2014/06/NATS_Standed_Airport_Departures_Consultation_Summary_Leaflet.pdf

Ref 5: planning document

T/APP/C1570/A/99/1018211/P5, copy available

Ref 6 &7: Stansted flights for 2013

<http://www.stanstedairport.com/media/903318/departureseast.pdf>

<http://www.stanstedairport.com/media/1097532/2013mapsdepartureswest.pdf>

Ref 8:

http://www.londonairspaceconsultation.co.uk/wp-content/uploads/2014/04/NATS_GAL_LAC-Report_FINAL-01-04-14.pdf

Ref 9: slide 17

http://www.stanstedairport.com/media/4211/stn_noise_action_plan.pdf