

NATS Departure Route Proposal at Stansted Airport Consultation

**Response by the Environmental Interests Group of the Stansted Airport
Consultative committee (STACC)**

September 2014

Introduction

The Stansted Airport Consultative Committee,(STACC) and its specialist sub-committee, the Environmental Interests Group (EIG) , welcomes the opportunity to respond to this NATS proposal.

As background information, the Committee notes that LAMP is in two main phases and that the main development of airspace for Stansted, Luton and Heathrow will come in Phase 2. This is currently scheduled for 2018/19 and is anticipated to involve a significant redesign of the Stansted routes.

The Committee is aware that the Airports Commission has published its Interim Report with proposals on runway capacity in the UK and will be submitting a final report in Summer 2015 for which the Government will make its decision subsequently. The introduction of additional airspace capacity at other London airports will affect the pattern of airspace in the South East and as a result likely to result in further changes to Stansted airspace. The Committee notes that Stansted Airport is currently operating at half its permitted capacity.

NATS proposal

The Committee understands that the NATS proposal involves switching daytime flights (6am to 11pm) from the existing south-east (Dover) departure routes to the existing east (Clacton) departure routes. These Dover and Clacton routes account for half of all departures from the airport. Departure routes to the west of the airport and all arrival routes are not affected by this proposal and remain the same. It is noted that night flights (11pm to 6am) are also not affected.

NATS states that the benefits of the proposed change are:

1. Reduced CO₂
2. Reduced delays for Stansted Airport and neighbouring airports
3. Reduction in the number of people regularly overflowed during the day

NATS asserts that reduced delay is achieved by continuous climb on the Clacton route during the day where currently only about 10% of flights achieve this on the Dover route.

The NATS maps provide an analysis of the traffic levels, densities and heights on the Dover and Clacton departure routes. These provide a good picture of what would happen if this change were to be implemented.

STACC/EIG position

The Committee notes that NATS has focused on local environmental impacts below 7,000ft; that 2012 traffic levels are used as the baseline for noise analysis; and that the 2012 update of the 2001 Census is the basis for the population and household counts. The Committee also notes that there would be no change to flights in the vicinity of Dedham Vale or Suffolk Coast and Heaths AONBs and no National Parks are affected by the proposal.

The Committee comments as follows:

Wider Issues:-

1. Firstly however, it should be noted in response to the NATS claim, that the proposal would bring more traffic closer to the southern boundary of Hatfield Forest – a National Trust property and a Site of Special Scientific Interest and the UK's best remaining Medieval Royal Hunting Forest.

2. Secondly, it should be pointed out that STACC has member constituents and receives representations from all locations surrounding the airport and indeed Uttlesford. One of the roles of the committee is to consider the impacts of the airport on all local communities in a balanced way.

Route Issues:-

3. By switching from the Dover to the Clacton route, the annual reduction in CO₂ emissions stated in the proposal¹ compared with the total annual CO₂ emissions of approximately 1.1 million tonnes for all aircraft operating at Stansted in 2012 would result in a saving of less than 1%.
4. As regards delays, NATS has stated that 2012 was the lowest year on record for ATC delays in the UK attributable to NATS². The delay averaged just 1.6 seconds per flight in 2012 and that 99.8 per cent of UK flights did not suffer any NATS air traffic control delay. NATS does not provide any further information as to what reduction in delay could be achieved, but it would appear to be insignificant, starting as it does from a very small amount.
5. The Government's guidance for the use of continuous climb procedure is that it is considered to have an overall neutral impact on noise. It involves the redistribution of noise, with more noise at the beginning of the flight and less noise further away from the airport³
6. Below 4,000ft, whilst 1,470 fewer people would be overflown, 2,400 people would be overflown more intensively. Compared with 2012, there would be double the number of flights on the Clacton route and quadruple the number of flights were Stansted to expand to its permitted capacity.
7. No information is provided for numbers of people overflown by aircraft between 4,000ft and 7,000ft other than NATS' statement that there would be a reduction in the overall area regularly overflown below 7,000ft.
8. Nor is any information is provided as to noise levels – either for aircraft noise or for ambient noise levels - against which aircraft noise events could be compared for the intensification on the Clacton route. It should be remembered that the area around Stansted Airport is rural in character with low ambient noise levels.
9. The proposal cannot be assessed in the overall context of LAMP Phase 2 as no preliminary information has been provided. As we know, this will involve a significant redesign of the Stansted routes, which may or may not affect any change proposed in this consultation.

The Committee also comments on the following changes which are not included in the NATS proposal:

1. The implementation of Continuous Descent Approach ('CDA') for all easterly arrivals. Stansted is the only designated London airport without CDA implemented for both runway directions. CDA has the potential to reduce noise from about 10 to 25 track miles from the airport over a large area in Essex and Herts under the arrival flight paths to the easterly runway by up to 5 decibels. It would also result in fuel savings and reduced CO₂ emissions
2. The Civil Aviation Authority (CAA) is currently trialling two departure instructions at Stansted to test track keeping accuracy and this trial is due to run until April 2015. Of particular relevance is the RNP trial for the Clacton 22 departure from the westerly runway

¹ NATS Departure Route Proposal, Table 3: Fuel savings

² NATS News Release dated 28 January 2013

³ DfT Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions, January 2014, para 4.5

where results to date have shown much improved track keeping. Assuming this trial is successful, Stansted Airport is likely to put forward a separate proposal to the CAA to make these instructions permanent. Whilst these trials are independent of this current NATS proposal, they have demonstrated greater NPR centreline adherence can be achieved, hence route certainty. In summary, the trials have already demonstrated that departing traffic on the Clacton 22 route can accurately follow the NPR centreline over the less populated areas between Hatfield Heath and Hatfield Broad Oak rather than over Hatfield Heath, which the current pattern of the majority of flights tend to do.

Summary

The Committee's overall view of the NATS proposal is that:

1. The reductions in CO₂ emissions and delay are relatively very small.
2. For communities living under the departure flight paths out to 20 miles from Stansted Airport, the proposed switching of routes would result in nearly twice as many people being overflown twice as intensively at the lower altitudes (hence greater noise disturbance) compared with those for whom flights would become negligible. This is an unacceptable variation from the established norm.
3. The Government's Aviation Policy Framework, March 2013, Chapter 3, Noise and other Environmental Impacts, states that 'As a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the industry must continue to reduce and mitigate noise as airport capacity grows. As noise levels fall with technology improvements the aviation industry should be expected to share the benefits from these improvements'. The Government also 'recognises that noise is the primary concern of local communities near airports'. It is clear that the consultation highlights purported benefits 20 miles distant from the airport, in an area to the south from Billericay out to Rochester in Kent (where aircraft are currently held down to around 7,000ft on the Dover route), rather than detail the disadvantages to communities nearer the airport.

The Committee therefore believes that, for the communities close to Stansted Airport, the environmental disadvantages are not outweighed by the gains, and indeed do present a doubling of noise incidents to nearly twice as many people as would benefit.

Whilst presented as a separate change, it is clear this proposal is an intermediary revision to the airspace of Stansted Airport. The consultation provides no information as to further changes that may or may not take place as part of the overall LAMP programme, or indeed that result from the Airport Commission recommendation and subsequent Government decisions. The Committee considers that insufficient information has been provided for it to submit a supportive response and therefore recommends that this departure route change should be postponed until the LAMP Phase 2 consultation, when significant airspace changes are likely to be proposed for Stansted. In so doing, this departure route change would be able to be more adequately addressed and assessed:

1. In the context of the whole airspace plan
2. To include a tangible analysis of environmental / noise affecting local residents
3. To include the additional benefit of implementing Continuous Descent Approach for all arriving aircraft to the easterly runway at Stansted Airport.

Environmental Issues Group
Stansted Airport Consultative Committee
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