

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Leader and Cabinet

8 May 2008

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RESPONSE TO THE CONSULTATION ON CHANGES TO THE AIRCRAFT MOVEMENTS OVER SOUTH CAMBRIDGESHIRE AS A RESULT OF THE PROPOSALS BY NATS

Purpose

1. NATS (National Air Traffic Services) are carrying out a consultation on a proposal to change the way in which aircraft fly over parts of London, southern and eastern England. This airspace is called 'Terminal Control North' (TCN). This includes changes to movement over South Cambridgeshire District.
2. The consultation period is for 13 weeks and ends on 22 May. The consultation documents can be found at www.nats.co.uk/TCNconsultation
3. This is a key decision because it is likely to have a significant effect on communities living or working in the District and does raise new issues of policy. It was first published in the April Forward Plan.

Executive Summary

4. The report outlines the current consultation being carried out by NATS and explains how these proposals will affect South Cambridgeshire. Currently there are two shared holds for Luton and Stansted Airports one of which covers part of the District in the vicinity of Melbourn. Aircraft in these holds stack from 7,000 to 14,000 feet. The whole of the District south of the A428 west of Cambridge and the A14 to the east (including the area of the hold) can currently be overflowed by aircraft as low as 4,000 feet, which are making a direct descent to land at Luton or between 5,000 feet and 3,000 feet to land at Stansted.
5. It is proposed to replace these two holds with three new holds— one for Luton airport and two for Stansted airport, two of which will be positioned over parts of South Cambridgeshire. The Luton hold is to centre around Cambourne (almost wholly over South Cambridgeshire) and the second for Stansted is to the east of Linton (about half over South Cambridgeshire). The area of the District overflowed by aircraft flying as low as 4,000 feet, which are making a direct descent to land, will be considerably less. The proposed Luton hold will have aircraft at overflying it at 6,000 feet whereas at present this is as low as 4,000 feet. Those villages in the vicinity of the proposed Stansted hold in the Linton area will be overflowed by aircraft coming directly in to land at Stansted passing overhead no lower than 4,000 feet instead of as low as 3,000 feet as at present.
6. The net change of these proposed changes is that more aircraft will overfly the District albeit at higher altitudes, including those aircraft, which are placed in the holds during busy periods.
7. This report assesses the implications that these changes will have for communities in the district as well as the consultation process.

Background

8. NATS provides air traffic control services to aircraft flying through UK airspace and over the eastern part of the North Atlantic and at 15 of the UK's airports. They carry this out under licence from the Civil Aviation Authority (CAA) – the government appointed agency for regulating UK airspace.
9. The TCN airspace change proposal is the latest in a rolling programme of UK airspace reviews. The review is required for three reasons – to improve safety, avoid delays and to protect the environment
10. NATS is required to respond to demand for airspace from aircraft operators; this demand is in turn influenced by government policy on air traffic growth as outlined in the 2003 Air Transport White Paper. NATS does not have control over the growth of airports such as at Stansted or Heathrow with the proposals to add new runways to these airports; nor do NATS have control over any increase in the numbers of aircraft flying. Therefore this consultation does not address concerns over aviation growth.
11. The consultation focuses on the effects the proposed change has to the local environment where these will be affected by aircraft flying up to 7000 feet above the ground (the lowest point of the proposed holds which will extend to 14,000 feet). In the TCN proposal routes below 4000ft have been positioned to avoid over flying sizeable population centres. Between 4000 and 7000 feet it has been necessary to balance the requirements of mitigating noise and reducing fuel burn and emissions.
12. The TCN region has been split into five areas to assist consultee's focus on the changes as they affect a particular area. South Cambridgeshire comes within the Consultation Area for Cambridgeshire, Suffolk and North East Essex (Section E). A link on the consultation webpage allows a consultee to put in a postcode address to see how the proposed changes will affect that particular area.
http://www.consultation.nats.co.uk/mapintro/6/how_this_affects_you.html
13. Routes and flight path maps are included within the consultation document for each area along with noise information. The colour coding on the maps show the lowest height at which aircraft on the route in question are expected to fly over a given area. The actual height that an aircraft will fly at will depend on a number of factors such as the type of aircraft and whether the surrounding routes are busy requiring height restrictions to keep aircraft safely separated. For safety aircraft should be vertically separated by at least 1000 feet and be at least 3 miles apart horizontally. The noise information shows the range of noise values for aircraft at each height. This range includes worst case for potential noise. NATS has stressed that the noise and height information are shown are for the worst-case scenario. It is likely that aircraft will be flying at greater heights and greater separation with the subsequent reduction in noise.
14. NATS began developing its proposals on the TCN consultation in 2004 and has met with local authorities to enable them to understand the issues important to specific localities. All local authorities identified noise nuisance as a concern to communities they represent. NATS has put a high priority on minimising the number of people over flown at low levels. Maintaining tranquillity in the countryside was also identified as a concern by local authorities. NATS has tried to accommodate the request to maintain tranquillity. However NATS believe that it is not possible in the busy airspace over the UK to avoid over flying both densely populated areas and the surrounding countryside.

15. NATS were advised in where any future development would be located in the County and any landscape areas that were identified for protection.
16. Analysis has shown that the nature of the changes in the TCN proposal do not impact local air quality and South Cambridgeshire environmental health officers agree with this.
17. Although other airfields are located within the TCN proposal area these will not be seriously affected by the changes according to NATS. Duxford Imperial War museum had requested that the controlled airspace within their vicinity be increased from 4500 to 5500 feet. This could not be accommodated within the current proposals however air shows will be accommodated in the same way as they are at present.
18. Environmental Health officers have considered the noise impact of the TCN proposals. The assessment included in the consultation documents has been carried out in accordance with guidance issued by CAA- Civil Aviation Paper (CAP), CAP 725 –*Guidance on the application of the airspace change process*. In this guidance it specifies Leq contours as the most commonly used method of assessing aircraft noise impact. This is an accepted indicator of community disturbance. The World Health Organisation (WHO) estimates that the population will be significantly annoyed somewhere between 50 and 55 decibels (and about 10 decibels lower at night) and therefore recommends maximum noise exposure levels of 55dBA Leq daytime and 45dBA Leq night-time in residential gardens to avoid the risk of people being significantly annoyed.
19. However NATS have not produced Leq contours where the average noise levels are expected to be below 57dBA – this includes all areas where aircraft operate above 4000 feet. The Leq form of measurement shows an average noise level over a period of time and therefore would not show higher levels of noise over this period or the frequency of these higher noise occurrences. In these circumstances the CAA guidance considers the use of other parameters such as the Lmax – the highest noise value measured over a given period of time. These are the figures, which have been provided in relation to changes over Cambridgeshire.

The Current Proposal by NATS

20. **Only one option** - Only one proposal has been put forward for consultation although NATS did consider other options. The chosen option has been thoroughly tested by them. They are concerned that if more than one option was proposed given the geographical extent of the TCN area that there would be information overload to all the consultees. NATS was also concerned that airspace management is complex and so providing one option reduced potential confusion to the public.
21. However in the CAA document CAP 725 which NATS has followed for this consultation it states that in preparing consultation documents “.....If a single design option is being consulted upon it would be advantageous to briefly state what other options have been considered and give the reasons why these options have been discarded.” (CAP page 8 para 19).
22. **Suggested response by South Cambridgeshire District Council**
Whilst recognising that airspace management is complex the Council would have preferred to have greater details provided on the alternative options since these might have assisted in understanding why the final option was considered to be the best.

NATS has not complied with the CAA guidance in this matter. The Council request that additional information be provided on the other options considered by NATS.

23. **Additional holds proposed** - A hold is where an aircraft flies a prescribed circuit waiting to land and is directed there by the air traffic controllers. Aircraft enter the hold at 7000 feet and then stack at 1000-foot intervals up to a height of 14,000 feet. Holding can accommodate up to eight aircraft but will only be used when numbers of arrivals are high. The preference is always for aircraft to fly directly to their arrival airport and therefore holds are only used during very busy periods.
24. There are currently two 'holds' shared by Luton and Stansted. One called LOREL in the vicinity of Royston and the other called ABBOT in the vicinity of Sudbury. The only existing hold that affects South Cambridgeshire is LOREL, which affects the south-western part of the district, to the south of the A14 and A428 at heights above 7,000 feet in the hold or as low as 4,000 feet for aircraft coming in directly to land at either airport.
25. Sharing holds causes delays because traffic for one airport can get stuck behind traffic queuing for the other. NATS propose that there be separate holding areas for each airport.
26. The holds must be carefully positioned so as not to obstruct other air traffic but need to be close enough to the airport to enable air traffic control to create an efficient stream of aircraft for landing during busy periods. If the distance is too great then the runway is not used efficiently and aircraft have to use more fuel because they are kept in the air for longer. This is the reason why positioning the holds over the North Sea is seen as not practical by NATS. MOD training flights over the North Sea was another reason for holds not being positioned over the sea. However the holds cannot be too close to airports otherwise an aircraft will not be able to achieve a *continuous descent approach* profile. This type of approach can reduce the noise experienced by some of the populations over flown and reduce the overall aircraft emissions during descent. In these descents the aircraft stays at a higher level for longer and then smoothly descends rather than in a stepped manner towards the runway.
27. Aircraft follow a defined circuit in the hold so the potential noise impact on communities below is a key consideration. The design aims to position new holds away from population centres where possible. Additionally the area that could be considered within Cambridgeshire and Suffolk was constrained by busy departure flows to the south and west; the Dedham Area of Outstanding Natural Beauty to the east and by military air traffic located to the north.
28. Alternative options were investigated for the position of the holds and these are illustrated in small scale on Figure E2 of the consultation document.
29. **Suggested response by South Cambridgeshire District Council**
The Council support the removal of the sharing of holds by Luton and Stansted given that this will improve the operational safety and efficiency of aircraft movements over this District. The Council are concerned that Stansted is to have two holds with the implication that there is then the need to position more holds over the South Cambridgeshire area but welcome the proposed increase in height of aircraft overflying the District. There has been no reasoned justification for the need for two holds.

30. **New holds within South Cambridgeshire** – Of the three new holds two are over areas in South Cambridgeshire – one to serve Luton and one to serve Stansted.
31. All holds will start with aircraft stacking at 7,000 feet and have aircraft stacking at 1,000 ft intervals up from this height. However the height contour maps show the two holds in South Cambridgeshire to have aircraft flying at lower heights than this. This is due to aircraft preparing to land at Luton or Stansted and following set descent routes to the runway from the holds. Aircraft will therefore be seen at lower heights below the holds to the height of aircraft making a direct approach to land. However, no aircraft would descend as low as 3,000 feet as currently occurs over some of the District south of the A11.
32. **New hold for Luton** - The new hold for Luton is positioned to the west of Cambridge with Cambourne, Little Gransden, Papworth Everard, Papworth St Agnes, Gravely, Eltisley, Croxton, Bourn, Longstowe, Arrington and Hatley sited within this hold area.
33. This hold is shown on the maps as having aircraft flying at heights above 6,000 feet for most of the district other than a triangle across the southerly tip from the A 505 across to Whaddon and Wendy, which will be above 5,000 feet. This affects a large area to the west of Cambridge that was not previously under a hold but where aircraft currently coming in to land directly at Luton and Stansted overfly as low as 4,000 feet and 5,000 feet respectively. Table 1 indicates the numbers of aircraft arrivals to Luton airport and Table 2 the noise level at these heights for Luton arrivals.

Table 1 Figures for both Westerly and Easterly Arrivals to Luton

Average Hourly Usage Rates	2006	2009	2014
Night Ave/hr (2300-0599)	1.1	1.4	1.8
Day Ave/hr (0600 – 2259)	8.3	10.3	13.1
Peak Hour	25.0	25.0	25.0

34. For someone living below the stack in 2009 (Connington, Elsworth, Upper Cambourne, Arrington, Croydon, Tadlow, Hatley, Gamlingay, Waresley) this could mean that during the peak hours that an aircraft could fly overhead once every 2.4 minutes in the hold. The peak hour is likely to coincide with the rush hour periods i.e. between 8-9am and from 5-6pm.

Table 2 Noise levels for Luton Arrivals

Aircraft type	Typical Aircraft Boeing 737-700	Noisiest Aircraft
% of movements	26%	<1%
Heights (ft)	Noise Lmax dB _(A)	Noise Lmax dB _(A)
6000-7000	<55-60	<55-61
5000-6000	<55-63	56-64

35. For 26% of the aircraft movements flying at 6,000 feet a sound comparable to the noise of a busy office would be apparent falling away to background and then returning with the next aircraft. Intermittent noise such as this can be more intrusive than a constant noise, which the brain will adapt to.

36. **New holds for Stansted** - Of the two holds for Stansted one is located south of Newmarket (Stansted West) and the other to the south of Stowmarket (Stansted East)
37. The Stansted West is the only one that is above South Cambridgeshire. It affects the southeastern part of the district to the west of Linton included within the hold are Shudy Camps, Bartlow, Horseheath, West Wickham, Weston Green, Weston Colville, West Wrating and Carlton. This hold is shown on the maps as having aircraft flying at heights above 4,000 feet. Currently aircraft can fly as low as 3,000 feet in parts of this area as aircraft prepare to land at either Stansted or Luton. Table 3 indicates the number of arrivals to Stansted Airport and Table 4 the noise levels for the Stansted arrivals

Table 3 Figures for Arrivals to Stansted Airport

Average Hourly Usage Rates	2006	2009	2014
Night Ave/hr (2300-0599)	2.3	2.6	3.0
Day Ave/hr (0600 – 2259)	14.9	16.5	19.6
Peak Hour	33.0	33.0	33.0

38. For someone living below the stack in 2009 (including villages such as West Wrating and Linton but mainly to the south-east of the district) this could mean that during the peak hour an aircraft could fly overhead once every 1.8 minutes. Intermittent noise such as this can be perceived as more intrusive than a constant diffuse noise, which the brain will adapt to.

Table 4 Noise levels for Stansted Arrivals

Aircraft type	Typical Aircraft Boeing 737-800	Noisiest Aircraft
% of movements	50%	<1%
Heights (ft)	Noise Lmax dB _(A)	Noise Lmax dB _(A)
3000-4000	59-71	65-76
4000 - 5000	58-69	60-73
5000-6000	55-67	55-70
6000-7000	<55-63	<55-68

39. For 50% of the aircraft movements flying at 4000 feet this will sound like a car passing 23 ft away travelling at 40 miles per hour.
40. Judging the level of noise and the disturbance caused by it is difficult because both holds are over parts of the district that are very rural. NATS has referred to tranquillity maps produced by CPRE, which place Cambridgeshire as high as 15th in the rankings for tranquillity amongst county council and unitary authorities. However NATS has not fully studied the affects of the loss of quiet countryside. The Luton hold is over a Countryside Enhancement Area identified in the Council's Biodiversity Strategy – such areas are for quiet enjoyment of the countryside. The new holds are over rural area in South Cambridgeshire, which are likely to have a low ambient noise level therefore when noise is introduced into a formally quiet area it may be more intrusive than into an area with more background noise. BAA in their publication

'Bothered by aircraft noise? We're listening' states that '...people are sometimes disturbed. This happens more often when a stack is over the countryside, where there is little background noise, such as road traffic.'

41. It is not only the people living under the holds that could be affected by the aircraft flying overhead. South Cambridgeshire is a predominantly rural authority, which has many farms with animals that could be disturbed by the proposals. In particular Linton zoo is under the West Stansted hold and Wimpole Hall farm with its special breeds animals could be affected by the Luton hold.
42. The proposed West Stansted hold is positioned so that it affects areas to the south of Newmarket where there is a concentration of facilities relating to the horse racing industry. This industry employs many local people and is a valued part of the community. The noise generated by aircraft flying over this area could affect the horses that are trained here and there has been considerable press coverage that trainers could consider moving their stables with the subsequent loss to the community.
43. **Suggested response by South Cambridgeshire District Council**
The Council is concerned that the two new holds which will experience an increase in aircraft activity are part of the District which are very rural in character with low ambient noise at present and the disturbance to these areas will be greater than if flights were over more populated areas or ones with a higher ambient noise such as near busy roads. It is likely to cause disturbance to the communities living in these areas as is highlighted in the BAA publication on noise. The frequency in which aircraft use the holds could create an intermittent noise pattern that would disturb these quiet rural areas.
44. *The Council is concerned by the impact these proposals will have upon the animal population living under the holds.*
45. *The Council request that alternative positions for the holds should be seriously considered in areas where there is a higher ambient noise level – such as nearer to the A1 corridor. As NATS did not provide information on the alternative locations considered by them it is difficult to assess the advantages of their proposed holds. CAP 725 states that as a result of a consultation NATS should be prepared to challenge long-standing beliefs and this must be the case in re- positioning the holds away from quiet rural areas. (CAP 725 Page 8 para 20(g))*
46. **Populations affected –** NATS has claimed in the consultation document that compared to the location of the two existing holds that significantly less people live beneath the three new holds – a reduction of 35.8%. This is one of the great benefits of the new proposals. NATS has indicated that the population count below the proposed Luton hold is 14227 using 2006 population data sourced from CASI International Inc. However the County Council research department has questioned this figure and found that some 18290 people live under the proposed hold according to their estimates - 4063 more than is considered by NATS. The population under Stansted West hold is given as 10371 and once more the County has calculated this as a higher figure – 17930 which is 7559 more than NATS figures.
47. **Suggested response by South Cambridgeshire District Council**
The Council is concerned that the population figures used by NATS in this document to indicate the numbers of people affected by the new holds appear to be erroneous showing lower figures than those calculated by the County Council. The benefits of

the newly proposed holds may mean that it is not the case that fewer people will be over flown.

48. **Population numbers within Leq noise contours.** NATS has provided information about the population counts predicted for 2009 within different Leq noise contours – these contours provide an estimate of noise impact based on total noise from all the summer daytime traffic for individual airports over a 16-hour period. The contours join points that have an equal average noise level. These contours have not been plotted on a map to indicate where they will occur apart from the 80 and 90dB_(A) contours, which are directly around each airport. At the presentation made to councillors on 17th April it was indicated that it would be possible to convert the Lmax dB_(A) information held by NATS into Leq contours for noise contour maps to be made of lower dB levels.
49. Of interest to South Cambridgeshire is the fact that there would appear to be a 111.6% increase in the population affected between the current and proposed design for Luton airport within the 57dB_(A) contour. (Table C4 NATS consultation document – page C8) This noise level is compared to the noise being generated by a busy general office and is recognised by the government as marking the approximate onset of significant noise annoyance. This may indicate that many more people will be affected by lower level disturbance than with the existing air traffic design however without spatial maps to show these contours it is not possible to make an assessment of how residents in South Cambridgeshire will be affected by the noise.
50. The Council's Environmental Health officers advise that there` has been an oversimplification of the presentation of noise, which has led to confusion by local communities and has heightened the concerns residents have felt about the proposals.
51. **Suggested response by South Cambridgeshire District Council**
The Council requests that maps showing the noise contours should be provided in order to assess the impact of the proposed changes to the residents in South Cambridgeshire as regards noise. Without spatial maps it is not possible to make this assessment. The current maps by just showing the Lmax contours do not indicate the frequency of this noise to this district and therefore its full impact.
52. **Set routes** - Arriving aircraft flying from the holds to the runways at Luton, Stansted and London City do not currently follow a set route. NATS propose to establish set routes from holds to the runway. Air traffic controllers may still regularly need to take aircraft off the set routes to maintain safety and efficiency; however providing set routes will reduce the overall complexity of air traffic control for arrivals and therefore reduce delay.
53. Modern navigation technology called 'Precision Area Navigation' (P-RNAV) is now available and means that aircraft can fly more accurately along a given route, which will concentrate air traffic in some areas. This NATS consultation takes account of the availability of P-RNAV.
54. The implications for South Cambridgeshire of these set routes will mean that aircraft will follow a narrower corridor over the district thereby concentrating the impact of flights over a defined area. The set paths around the holds and then the set route followed by an aircraft as it approaches the runway could result in some parts of the district seeing and being affected by aircraft on a regular basis.

55. The Luton hold and the set routes to the runway are at heights above 6,000 feet over South Cambridgeshire. This is some 1-2000 feet higher than the existing LOREL hold near Royston so for the southern part of the district aircraft will be much higher in the sky so likely to cause less disturbance. At peak periods when the holds are most likely to be in use it is estimated that 25 aircraft an hour will use Luton. This reduces to 8.3 per hour in daytime and is predicted to increase to 13.1 by 2014.
56. The Stansted West hold near Newmarket has aircraft flying below it at levels above 4,000 feet, which could cause disturbance in South Cambridgeshire. At present part of this area are overflown by aircraft as low as 3,000 feet on a landing approach. The set routes for leaving the hold may concentrate the disturbance to a defined area benefiting some but dis-benefiting others.
57. **Direct flight paths** - NATS has specifically asked for comments on the use of direct flight paths. Aircraft on approaching an airport can be directed by air traffic controllers via a hold if there are a number of craft waiting to land. When the airspace is not busy it will be possible for a controller to direct an aircraft along a more direct path to the runway, significantly reducing the number of miles flown. This would be called a direct flight path- these are more efficient, burn less fuel and therefore produce fewer emissions. A direct flight path will not specifically avoid over-flying densely populated area whereas the proposed P-RNAV routes between the hold and the runway will avoid densely populated area where possible. Direct flight paths would spread across the community rather than along set routes.
58. There is therefore a choice in less busy periods aircraft follow either direct flight paths to the runway, reducing fuel burn and emissions but spreading the noise across the wider community, or a specified route which may burn more fuel and produce more CO2 but concentrate noise along a defined path.
59. **Suggested response by South Cambridgeshire District Council**
The Council is concerned that the use of set routes will concentrate the disturbance of aircraft into very narrow corridors but is aware that this is a navigational improvement for aircraft. If direct flight paths are used this could result in aircraft not being so concentrated along these dedicated corridors and could create less disturbance to those communities living below set routes since the potential noise would be spread over a wider area and potentially away from the more rural areas of this district. The Council would on balance prefer direct flight paths
60. **Method of consulting** – The TCN consultation directly affects South Cambridgeshire and whilst recognising that this consultation is covering a greater area with a population of some 12.6million there has been an unwillingness to consult with the public concentrating instead on the stakeholders such as County Councils and Unitary Authorities. Although Green Issues, the consultants organising the consultation for NATS, sent out letters in January 2008 to notify all local authorities about the consultation and an invite made to organise a presentation by NATS, neither this Council nor the County Council has any record of receiving this request.
61. The consultation document is long and complex for the TCN proposals and it is of regret that more hard copies were not made available. NATS has relied upon the documents being made available on –line however in this rural district with some areas not getting broadband this can be a time consuming process to download documents.

62. In CAP725 it encourages the use of a variety of method for consulting including public meetings or road shows to explain to a wider population the design options. NATS should have considered such methods.
63. The Council is particularly concerned that Parish Councils have not been fully involved in the consultation process. Although it is recognised that some 800 parishes are within the consultation area only leaflets were sent out to them- not hard copies of the document or DVD containing the documents. There was a delay of some four weeks in some parishes receiving this letter and therefore being informed of the consultation. This has affected their ability to respond by the May deadline. CAP 725 states that a reasonable period of time should be provided for consultees to respond and that 12 weeks is a minimum period. (Page 9 para 23)
64. The Council has welcomed the opportunity that has been given by NATS for a meeting of all councillors whose wards are affected by the repositioned holds and regrets that parish councils have not been offered a similar opportunity.
65. The on-line questionnaire presents a simplistic method of agreeing with the proposals, not agreeing or neither agreeing or not agreeing. The chance to comment is limited to 2500 characters. The consultation is highly complex and cannot be considered on such a simple yes/no basis. It would have been more helpful if a separate questionnaire had been tailored for each of the five areas in the TCN proposals so that NATS would have had a clearer view of respondents' comments from the five different parts of the consultation area.
66. **Suggested response by South Cambridgeshire District Council**
The Council welcomes the opportunity to comment on the TCN proposal but do not support the method used by NATS. Insufficient copies of the document have been made available to this Council and to parish councils for councillors to appraise the proposals. Information about the different options considered was not included in the consultation, which is contrary to the advice contained in CAP 725.
67. *Given the delay in local parish councils being informed of the consultation the Council requests that NATS seriously consider extending the consultation period to allow these parishes to be effectively involved in the consultation.*
68. *Given the additional information requested by the Council it is essential that a further period of consultation is made available to consider these options.*
69. **Future implications-** whilst recognising that NATS cannot consider the implications of the growth in the air industry that was set out in the Governments Air Transport White Paper in 2003 the future is one of increased aircraft movements. More aircraft will be flying over this district in the future and it is vital that NATS proposals are designed to minimise the impact of this growth. More information should have been made available on the impact of the current TCN proposals for this Council to be able to fully assess the implications of the changes. If future changes were proposed this Council would require that this additional information be provided.
70. The current proposals could be in place by 2009 and the Council suggest that a review be carried out after a reasonable period – for example after a year to assess the impact of the proposals fully and to ascertain whether the forecasts included in the consultation documents were accurate.

Suggested response by South Cambridgeshire District Council

71. *The Council request that a review be carried out a year after the current TCN proposals are implemented in order to assess their impact on local communities.*

Implications

72. As a result of the NATS proposal parts of the district will experience disturbance from aircraft flying or stacking overhead.

73.	Financial	Nil
	Legal	Nil
	Staffing	Nil
	Risk Management	Nil
	Equal Opportunities	Nil

Consultations

74. Consultations have taken place with the Council’s environmental health officers and County Council officers.

**Effect on Annual Priorities and Corporate Objectives
Effect on Corporate Objectives and Service Priorities**

75.	Work in partnership to manage growth to benefit everyone in South Cambridgeshire now and in the future
	-
	Deliver high quality services that represent best value and are accessible to all our community
	-
	Enhance quality of life and build a sustainable South Cambridgeshire where everyone is proud to live and work
	Quality of life for residents living beneath the proposed holds may be reduced.

Conclusions/Summary

76. The TCN proposals directly affect this district because two holds are to be positioned over parts of the district that had previously not had holds above them. This will result in an increase in the intensity of aircraft movements above these areas especially in peak periods when the holds are more likely to be in use. However currently both these areas have aircraft flying at lower levels than is proposed by NATS with the repositioned holds. These areas are quiet rural ones where the increase in the numbers of aircraft overflying the area with the intermittent noise generated by these aircraft could present a disturbance to the local community.

Recommendations

77. That South Cambridgeshire Council submits the following responses to NATS:

- (a) Only one option - Whilst recognising that airspace management is complex the Council would have preferred to have greater details provided on the alternative options since these might have assisted in understanding why the final option was considered to be the best. NATS has not complied with the CAA guidance in this matter. The Council request that additional information be provided on the other options considered by NATS.
- (b) Additional holds proposed - The Council support the removal of the sharing of holds by Luton and Stansted given that this will improve the operational safety and efficiency of aircraft movements over this District. The Council are concerned that Stansted is to have two holds with the implication that there is then the need to position more holds over the South Cambridgeshire area. There has been no reasoned justification for the need for two holds.
- (c) Holds for Luton and West Stansted - The Council is concerned that the two new holds which will experience an increase in aircraft activity are part of the District which are very rural in character with low ambient noise at present and the disturbance to these areas will be greater than if flights were over more populated areas or ones with a higher ambient noise such as near busy roads. It is likely to cause disturbance to the communities living in these areas as is highlighted in the BAA publication on noise. The frequency in which aircraft use the holds could create an intermittent noise pattern that would disturb these quiet rural areas.
- (d) The Council is concerned by the impact these proposals will have upon the animal population living under the holds.
- (e) The Council request that alternative positions for the holds should be seriously considered in areas where there is a higher ambient noise level – such as nearer to the A1 corridor. As NATS did not provide information on the alternative locations considered by them it is difficult to assess the advantages of their proposed holds. CAP 725 states that as a result of a consultation NATS should be prepared to challenge long-standing beliefs and this must be the case in re- positioning the holds away from quiet rural areas. (CAP 725 Page 8 para 20(g))
- (f) Populations affected - The Council is concerned that the population figures used by NATS in this document to indicate the numbers of people affected by the new holds appear to be erroneous showing lower figures than those calculated by the County Council. The benefits of the newly proposed holds may mean that it is not the case that fewer people will be over flown.
- (g) Populations within the Leq noise contours - The Council requests that maps showing the noise contours should be provided in order to assess the impact of the proposed changes to the residents in South Cambridgeshire as regards noise. Without spatial maps it is not possible to make this assessment. The current maps by just showing the Lmax contours do not indicate the frequency of this noise to this district and therefore its full impact.
- (h) Set routes and direct flight paths - The Council is concerned that the use of set routes will concentrate the disturbance of aircraft into very narrow corridors but is aware that this is a navigational improvement for aircraft. If direct flight paths are used this could result in aircraft not being so concentrated along these dedicated corridors and could create less disturbance to those communities living below set routes since the potential noise would be spread

over a wider area and potentially away from the more rural areas of this district. The Council would on balance prefer direct flight paths

- (i) Method of consulting - The Council welcomes the opportunity to comment on the TCN proposal but do not support the method used by NATS. Insufficient copies of the document have been made available to this Council and to parish councils for councillors to appraise the proposals. Information about the different options considered was not included in the consultation, which is contrary to the advice contained in CAP 725.
- (j) Given the delay in local parish councils being informed of the consultation the Council requests that NATS seriously consider extending the consultation period to allow these parishes to be effectively involved in the consultation.
- (k) Given the additional information requested by the Council it is essential that a further period of consultation is made available to consider these options.
- (l) Future implications - The Council request that a review be carried out a year after the current TCN proposals are implemented in order to assess their impact on local communities.

Background Papers: the following background papers were used in the preparation of this report:

The Consultation Document on Proposed Changes to Airspace.
The consultation documents can be found at www.nats.co.uk/TCNconsultation

Civil Aviation Authority - Civil Aviation Paper (CAP), CAP 725 –*Guidance on the application of the airspace change process*
www.caa.co.uk/application.aspx?catid=33&pagetype=65&appid=11&mode=detail&id=395

BAA - '*Bothered by aircraft noise? We're listening*'
www.baa.com/assets/B2CPortal/Static%20Files/stansted_final_noise06.pdf

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