



Response by Dacorum Borough Council to NATS consultation on Changes to Terminal Control North Airspace

This is the formal response of Dacorum Borough Council to the Consultation Document on Proposed Changes to Airspace – Terminal Control North, published by NATS. It relates primarily to Part F of the consultation document (Chilterns and Luton Area), as this has the greatest impact upon Dacorum Borough. Some comments are more generally applicable.

Section 1.16 of the consultation document states that at the end of the consultation period NATS must demonstrate to the CAA that the very best balance possible has been achieved between conflicting demands and objectives. The CAA requires that changes are made only *“after consultation, when it is clear that an environmental benefit will accrue or where airspace management considerations and the overriding need for safety allow for no practical alternative.”* Whilst supporting the principle of reducing delays (which would save on fuel consumption and therefore greenhouse gas emission) and increasing safety for those living and working under flight paths, a number of concerns are raised with regard to the proposals.

It is recognised that the impacts of any airspace changes will not be felt equally across the Borough. The Council’s key concern is therefore to ensure that the proposed changes are based on robust evidence and strike the most appropriate balance between environmental and safety concerns.

The Council endorses the responses made by Hertfordshire County Council (on behalf of all district and borough authorities within Hertfordshire) and that of the London Luton Airport Consultative Committee (submitted by Bickerdike Allen & Partners). This response is intended to supplement these submissions.

Consultation Process:

Section 4.6-4.13 outlines the role that Local Authorities have already played in developing the proposed airspace changes. Dacorum Borough Council was not directly involved in any of these pre-consultation discussions with NATS, although the Borough’s interests were represented by Hertfordshire County Council. The County Council have expressed surprise regarding the content of this consultation in the light of these previous discussions. This is concerning in terms of the weight that NATS appear to be attributing to this pre-consultation process.

Whilst the consultation period itself accords with statutory requirements, concerns are raised regarding the extremely short period of time (4 weeks) allowed for assessing the feedback received and suggesting any changes to the proposals prior to passing these through to the CAA for final approval. This seems to suggest that there has either been a significant underestimate of the level of interest these proposed changes would create, or that there is no genuine intention to make any changes to the proposals being consulted upon.

These concerns are underlined by comments made during NATS's presentation to the London Luton Airport Consultative Committee (LLACC). NATS advised that the opportunities for further change were minimal, although the views would be passed to the CAA.

A number of technical issues also remain unclear from the consultation and need to be clarified:

- The effect of the new P-RNAV system is to concentrate the impact of noise from departure flights. Whilst this is welcomed in terms of minimising the areas most affected, its full impact remains unclear. For example, how close will the aircraft keep to the central line and hence what surety is there regarding avoiding overflying the Borough's main settlements of Hemel Hempstead and Berkhamsted? For example, the red line is shown as turning to avoid Hemel Hempstead, but the direct (and hence most attractive?) route would go directly over the town.
- Berkhamsted seems to be at risk of overflying at 3,000+ feet, in order to avoid Princes Risborough at a higher altitude. This would appear to contradict the stated intention of reducing routes over the most heavily populated areas in order to maximise safety and minimise the impacts of noise.
- Whilst it is accepted that NATS have no influence over airport growth and hence aircraft numbers, assumptions regarding this appear to have been built in to the current proposals. No clear justification is given for why the growth in flights from Luton is predicted to be greater than for Stansted and Heathrow. This assumed rate of growth makes the airspace changes all the more significant for the Borough.
- References to altitude within the document are unclear and potentially misleading, with heights below 3000ft with reference to airport site level, and above that with reference to sea level. This issue of altitude is particularly pertinent when assessing the impact of the changes upon areas of higher land – such as the Chilterns (see below).

Impact on the Chilterns Area of Outstanding Natural Beauty:

Whilst some of the built-up areas of the Borough could benefit from the proposed changes to flight paths, serious concerns are raised regarding the impact of the proposed changes upon the Chilterns Area of Outstanding Natural Beauty (AONB) – a nationally protected landscape. The proposals will directly increase the number of flights over the AONB and reduce the altitude of these flights. This will have a significant impact upon noise levels in an area hitherto valued for its tranquillity.

Whilst all levels of aircraft noise cause nuisance, there is clear evidence¹ that this nuisance is significantly greater where ambient noise levels are low (such as in the Chilterns). This issue of ambient noise does not appear to have been taken into account. Noise levels as a result of westerly departures to the East and South East will also be higher than indicated within the consultation document, due to the need to increase engine power to accelerate and climb.

¹ 'Attitudes to Noise from Aviation Sources in England.' (ANASE), Department for Transport, November 2007.

The main objective of the proposals is to reduce the number of people being overflown at altitudes of less than 7,000ft. DfT policy also refers to minimising the impact of any changes upon AONBs. The consultation document states that *‘when balancing the various design objectives, improvements in fuel efficiency and the number of people overflown below 7000ft were given greater priority than avoiding over-flight of AONBs....’* However, the current proposals do not appear to provide any overall reduction in fuel burn and CO2 emissions. Cumulative populations within these ‘rural’ areas are also high, although less concentrated in nature. Population counts within the 57 dB L(Aeq, 16h) contour area, which is the daytime level that marks the on-set of significant community annoyance, actually show a significant increase in the populations affected.² This raises the question of how balanced the proposals really are in terms of the issue of environment vs safety and whether the DfT’s key requirements are being met by the airspace review.

In the light of the above, consideration should be given to Hertfordshire County Council’s suggestion of routing direct flights across urban areas during off-peak day periods, but not in the late evening, night and early morning periods, or at heights below 3000ft. This would allow some respite to rural areas, whilst avoiding more densely populated urban areas at times when ambient noise levels are low.

Future Housing Growth:

The Council understands that NATS were required not to take the location and extent of future housing growth into account when drawing up their proposals. This could result in the revised flight paths failing to meet the key objective of the review; avoiding overflying built up areas.

Consideration should be given to delaying a decision on airspace change for TCN until a clearer picture emerges regarding growth locations at Hemel Hempstead (and elsewhere within the County). The proposed changes also appear to assume that there will be a significant growth in flights from and to Luton airport, despite there being no current proposals for airport expansion.

² From 4,758 people under current arrangements to 10,068 under the proposed arrangements for the forecast 2009 contours.