

TCN Consultation
NATS
Freepost NAT22750
Reading
RG1 4BR

**County Hall
Hertford SG13 8DN**

Contact Steve Bailes
Tel 01992 556293
Fax 01992 556290
e:mail steve_bailes@hertsc.gov.uk
My ref FP/SDB/ah/ 02.06.12
Your ref

11 June 2008

Dear Sir

Airspace Change Proposals TCN: Response of Hertfordshire County Council

Thank you for consulting the County Council on the proposed changes to airspace over the county and for the post and pre-meetings with county council officers regarding potential changes. Despite these meetings in 2006 some of the changes proposed in the 2008 consultation were a surprise to the council and a number give particular cause for concern.

In considering the proposals the county has liaised with its District Councils. The District Councils will be responding separately but you will find that in regard to the specific routes there is general agreement between all the authorities. This response has been agreed between the authorities and should be regarded as a joint response from all the Hertfordshire local authorities.

The councils are concerned that the proposals are required to provide more capacity for air flights in the region. The consultation refers to the period 2009-2014 and the maximum use of existing runways but it seems apparent that these routes have also been designed for use if there were additional or extended runways certainly at Stansted and Luton.

The County Council has steadfastly maintained a policy of objection to such new runway development. These comments should be read in the light of this policy as we have no way of knowing which of the proposed changes are required to meet forecast demand to 2014 and which are to enable further growth beyond that in line with the predictions of the Air Transport White Paper. An absolute cap on aircraft movements in the TCN should be imposed to provide some environmental protection to residents.

Any change to airspace will mean there are some winners, residents with less over-flying, and some losers, residents who will suffer an increase in over-flying. To this will be the added impact of P-RNAV further concentrating flights on a narrow swathe in some areas.

There will inevitably therefore be some significant losers with these changes especially in presently quiet rural areas where occasional aircraft over flights will be replaced by a concentrated stream of aircraft.

One of the objectives of NATS in designing the changes is to reduce the environmental impact of the air routes in terms of people affected by noise. This is of course welcomed by the councils but the evidence of reduced impact in the report is limited, even leaving aside the obvious point that there will be more aircraft and therefore more noise in the future.

The figures for residents within the 57 Leq contour area show an increase at Stansted and Luton despite those contours being dominated by arrivals traffic which does not change so close to the runway. Details of the 54 Leq contour area and populations have been requested from NATS but to date have been refused despite the strong advice in CAP 725 that they should be provided.

Population counts (as in the NATS Amendment) of residents under the Noise Preferential Routes (NPRs) show a decline in numbers at both airports but a direct comparison can be misleading. The NPRs change in length and populations far from the airport (e.g. Hatfield, Luton easterly departures to the East and South East) are being compared with populations much closer to the runway (north of Stevenage) who, in addition, have not previously been affected. Also some areas shown as rural, such as those west and north of Stevenage, are now formally identified as regional growth locations (housing) in the recently published Regional Plan.

Any comparison to judge whether the noise climate is improved or worsened (disregarding the increase in flight numbers) is made more difficult by the consultation not making clear the height that aircraft could be expected to be flying at when following an NPR and whether noise abatement systems might be operated. The minimum heights shown are a worst case but provide little idea of what heights the typical aircraft (B737s and A319s at Stansted and Luton) would normally be and when they could be expected to vector off the set routes. It is also noted that while below 3,000 feet aircraft heights are referenced to the airport site ground level (500 feet in Luton's case) those above that height are referenced to mean sea level meaning the actual aircraft height above the ground could be less than the minimum shown (D 11.10).

Related to this is the concern that the flight paths are being devised to suit the worst performing aircraft even though these aircraft make up a very small proportion of the total and are likely to decline over time. The potential for environmentally preferred routes which would suit the vast majority of aircraft should be considered with the poor performing aircraft limited to other routes or even banned from the major airports entirely.

As a further general point on the choice of routes the consideration of alternative options in the consultation report is inadequate. The report shows some options which were considered but not those for other routes where there are clearly difficult issues, e.g. Luton easterly departures East and South East over north Stevenage. The complication of providing additional usable air routes is acknowledged but a clear exposition of alternatives considered and why they are not proposed is essential if the public are to accept that the changes intended are the best that are practical.

As well as considering the proposed routes (see below) council members have considered the more general issues. The NATS proposals aim to concentrate flights over rural areas rather than urban areas. While this may be the most equitable course it does mean seriously threatening the tranquillity of some rural areas, a tranquillity that is important not only to the residents but also to the many visitors to Hertfordshire's countryside. In addition in Hertfordshire many of the rural areas are well populated and the concentrations of aircraft flights will mean residents over a large (long and thin) area being badly affected by noise levels well above the otherwise low ambient noise levels.

In the light of this as regards 'direct flights' the councils would accept direct flights across urban areas during off peak day periods but not in late evening, night and early morning periods nor should they normally be at heights below 3000 feet. This would allow some respite to rural areas but flights over urban areas in the vulnerable night times when the ambient noise level is low are not acceptable. (Direct flights should not however include vectoring departures across urban areas such as east Stevenage.)

Over rural areas where there are no significant urban areas arriving aircraft from the stack (such as on Luton westerly arrivals east of Stevenage) should be dispersed as at present rather than concentrated on the new route centre line to the detriment of particular villages. Similarly beyond the ends of the NPRs departing aircraft should be dispersed within the defined swathes rather than concentrated on the centre lines provided vulnerable areas (including urban areas) are avoided.

As regards the specific proposed routes the County Council and District Councils would wish to make observations on the following.

Luton Airport

Easterly Departures to East and South East.

The proposal to route aircraft across north Stevenage is a major concern and is totally unacceptable. It is quite contrary to the objective NATS refers to of avoiding major population areas where flights are below 4,000 feet and there is no explanation as to what alternatives were considered and why they were rejected. To make matters worse the South East route is shown as permitting vectoring over east Stevenage further increasing the impact on this highly populated area.

No detail is provided in the consultation report regarding the impact on existing schools and hospitals etc. affected by the proposal contrary to the expectations of CAP 725. You will, following meetings with county council officers and others, now be well aware the route centre line goes very close to Lister hospital, the main (acute) hospital in north east Hertfordshire (and preferred option for 'consolidation') and to the Cygnet (psychiatric) Hospital and to two major secondary schools and a number of other schools.

In addition the areas to the west and north of Stevenage are allocated for major new housing development in the Regional Spatial Strategy (the new Regional Plan which has now been formally adopted by Government). These areas are specifically referred to as locations for a minimum of 16,000 dwellings and as such should be avoided by the proposed flight paths. The new flight paths suggested by NATS would cross the

development areas either reducing the areas available for development or resulting in the new houses being built in a poor noise climate.

The attached map shows the hospitals, schools and existing and proposed housing areas. It also shows a proposed alternative route to the north utilising the 'gap' between Stevenage and Hitchin. (As with the other alternatives below the proposal is diagrammatic and the councils would expect NATS to consider a precise route which meets their technical needs.)

Such a route would seem quite flyable using P-RNAV and has been suggested by a number of residents. It would adversely affect a number of villages in the area but it is the view of the councils (particularly the County Council, Stevenage Borough Council and North Herts District Council) that the option would be preferable to that proposed. NATS must provide detail as to why it is necessary to fly over one of the main towns of Hertfordshire which already inevitably suffers noise from landing aircraft. Ease of operation is not in itself an adequate justification.

Further east the centre line of the proposed route is shown very close to Bishop's Stortford with aircraft only just over 5,000 feet (above sea level) to ensure they are below those departing Stansted. An assurance is required that aircraft will be vectored to ensure they avoid over flying the town.

If the northern option suggested by the councils is proven to be impractical the option of using the existing route but turning east further north than at present to avoid Brookmans Park should be considered (diagrammatic map attached). It may be that in this instance a route will be needed that suits most (high performing) aircraft and that avoids populated areas with a separate route for the occasional poor performance aircraft.

Whichever route is chosen, that proposed by NATS or the northern or southern alternatives, it is important that aircraft are not permitted to vector across the built up area of Stevenage. The finalised flight path plans should make this clear.

The councils note with regret that the northerly route over Hitchin is not to be improved. The introduction of P-RNAV should enable aircraft to follow the existing route without over flying the town as at present and would be welcomed but vectoring north eastward should not be allowed until the aircraft have passed the built up area. It is not clear from the consultation material (published and additional) why this cannot be done.

Easterly Departures to the South West.

The change in the curve after take-off clearly means there are winners and losers on this section of the route with aircraft closer to Whitwell and concentrated over the Ayotts. Avoiding Harpenden is welcomed but adherence to the new route such that it avoids Wheathampstead as shown must be assured in practice (ie no vectoring off this part of the route).

The councils would require the swathe to be further limited to avoid Hemel Hempstead to utilise the gap between Hemel and Redbourn as there can be no justification to over fly the town as presently shown. The route centre line should also be moved slightly further

north west to avoid over flying Berkhamsted and minimise over flying of the Chilterns Area of Outstanding Natural Beauty (AONB).

These alternatives are shown on the attached map but the council is also concerned that the area shown as 'minimum height over 3000 feet' has increased substantially in the new proposals. (This also applies to westerly departures SW). NATS letter in March suggested this was due to Luton aircraft having to keep beneath Heathrow traffic departing to the north though this route appears unchanged in the report (H7 and H8).

There is clearly a problem of Heathrow traffic passing close to Luton and this should be addressed in this programme of changes. If this is means moving the Bovingdon Stack this should be considered to achieve a better environmental option for the region. This issue is particularly important as the present proposals would involve Luton aircraft flying low over the Chilterns AONB.

Westerly Departures to the East and South East.

These routes around Luton to the north show the centre line passing directly over Hitchin town centre, albeit at a minimum height of 5,000 feet. These routes should be moved slightly southwards in this area to utilise the 'gap' between Hitchin and Stevenage (see attached map).

It is noted that all westerly departures are to lose the sharp left hand turn after take off which has been a long standing noise abatement procedure at the airport. While for Hertfordshire such a change means there are winners and losers for Luton and Bedfordshire there are clearly many losers.

It would be most unfortunate if the introduction of a precision navigation system meant that such an existing noise minimisation procedure would no longer be possible even if local people desired to retain it. It has been suggested that the route should be non P-RNAV at the start but then pick up the precision navigation system after the first turn. Hertfordshire County Council has not taken a view on this aspect.

A further issue for these routes is that they will over fly the Chilterns AONB and particularly the scarp slope beyond Dunstable seriously affecting popular recreational areas where tranquillity should be retained. As this area is not within Hertfordshire the councils will leave it to others to propose alternative routing to mitigate this impact.

Stansted

Easterly Arrivals.

The councils (particularly the County Council, East Herts District Council and Broxbourne Borough Council) welcome the overall intentions of the proposals for easterly arrivals at Stansted, namely to increase the height of aircraft over East Hertfordshire and Broxbourne and introduce Continuous Descent Approaches (CDAs) with a track centre line which avoids the major residential areas of Hertford, Ware and Hoddesdon. There is however concern over the width of the swathe for traffic, which includes the three towns, and the clear statement in the report (e.g. F31.5.10) that NATS will use this swathe for operational reasons.

The councils would like assurances that the track centre line will be used whenever possible and certainly in the vulnerable late evening, night and early morning periods. NATS must be in a position to operate the system in the interest of the residents of affected towns as well as in the interests of efficiency for the aviation industry.

Westerly Departures to the South West and North

The centre line of the new route is shown as being slightly closer (0.5 – 0.75 km) to south east Bishop's Stortford than the existing. This does take it further away from Spellbrook and Spellbrook primary school but it is closer to the main built up area and importantly to the site proposed for two new secondary schools off Whittington Way (where the application for planning permission is anticipated to be submitted in May 2008).

The County Council and East Herts District Council therefore strongly request that the curve of the route remains as present and then links into the proposed route slightly nearer to Much Hadham and Hadham Ford (see attached map). Any deviation closer to these two villages is to be deplored but the small realignment suggested by the councils is thought worthwhile to protect the southern edge of Bishops Stortford and the new curve proposed by NATS should be rejected.

The councils are naturally concerned as to the implications of a potential Second Runway at Stansted but appreciate this is not a matter for this consultation. Development would though mean significantly more aircraft on this and other proposed routes than NATS currently forecast.

Heathrow

Westerly Departures to the North East

Heathrow departures to the north and north east cross Hertfordshire and although they are over 5,000 feet the nature of the aircraft and the large number of flights mean the aircraft cause noise nuisance across the county. Raising the height of these aircraft is therefore generally welcomed.

The specific proposal for the westerly North East departures would mean aircraft on the route centre line would be flying directly over Rickmansworth. It is not clear whether at that location it is anticipated that most aircraft would be following the centre line or whether the majority would have vectored away.

An alternative option is referred to in the consultation report (Fig H 32) which avoids Rickmansworth, Watford and other Hertfordshire towns but was rejected as it involved flying over Hemel Hempstead. The County Council consider this option should be reconsidered but with a turn eastward before Hemel to utilise the gap between the town and north Watford and continuing south of St Albans (see attached map). This would appear to provide the extra distance required but avoid the important Hertfordshire towns including Hemel Hempstead and St Albans.

The above represents the views of the Hertfordshire councils at the present time. A number of questions have been put to NATS representatives at meetings and through the

Airport Consultative Committees. While some answers have now been received following the formulation of this response in order to meet the timescale of committees and the original consultation end date they do not give rise to any change in the councils' views.

The overall concern remains that accommodating more air traffic movements in this already crowded area can only be achieved at a cost to the environment and in particular to the overall noise climate of Hertfordshire residents. The Hertfordshire local authorities wish to see an improvement in the county's noise climate and do not consider this to be possible if airspace operations are redesigned as proposed to allow more aircraft to over fly the county.

I trust you find the response helpful and if you require further information please get in touch. I would hope there will be further discussions with local authorities before any change is finally determined and implemented.

Yours sincerely

Steve Bailes
FORWARD PLANNING UNIT

Cc Peter Jacques
NATS TCN Consultation
Corporate and Technical Centre
4000 Parkway
Whiteley
Fareham
Hants PO15 7FL