

13 June 2008

TCN Consultation
NATS
Freepost NAT22750
Reading
RG1 4BR

Dear Sirs,

Terminal North Control – Proposed changes to air space

- (1) I write in connection with the above and specifically, those proposals affecting the Cambridgeshire, Suffolk and north-east Essex areas, as detailed in part E of the consultation document. I have set out below the representations of the Society, which I would ask are reported in their entirety to those deciding what action to take on this matter.
- (2) The Society is particularly concerned with regard to the proposed Stansted Eastern Hold stack and its impacts.

PROCESS, PROCEDURE AND ALTERNATIVES

- (3) The Society takes the view that the consultation process and proposals are flawed due to the fact that the primary purpose seems to have been to reduce the number of people affected by the stacking without: (i) examining the alternative to stacking and; (ii) whether it is feasible to stack aircraft away from populated areas. These two issues are dealt with below:
 - (i) Holding aircraft at the end of their journey is both disruptive, wasteful on fuel, adds to climate change problems and is the worst possible way of dealing with the phasing of the landing of aircraft. With others, we would support a wholly different approach where stacking effectively takes place at the commencement of the journey, on the runway before departure, rather than at the end. We do not underestimate the significant work and changes that would be made to facilitate this but believe such an option requires proper and careful consideration. It could deliver a significant number of major benefits for airlines not least a saving in fuel, reduce costs, greater efficiency and mean that aircraft movements have less impact on the population as a whole. At this stage, it appears that this consultation has only sought to perpetuate a continuance of the current flawed process. We do question whether other options were considered.

- (ii) Notwithstanding (i) above, if stacking at the end of the journey is to continue, whether this could be achieved away from populated areas, i.e., over the sea. We can see no rationale or justification in the consultation why stacking has to take place over any part of the Suffolk countryside, or any inland area altogether.
- (4) A further flaw is that it appears you have considered only one option, potentially contrary to CAA guidance. Why were not other options put forward?
- (5) There appears no formal independent assessment of the methodology used by NATS of the “facts” presented by NATS, nor of the analysis or conclusions drawn from those same facts. This must have some impact then on your proposed solutions. What do you propose to do to have the methodology independently assessed?

FACTUAL OMISSIONS

- (6) While much is made on page E14 of the possible reduction in population beneath the current and proposed holds, it appears the table does not take into account the population that will be affected by the flight paths in to the new hold and at exit. This is a major factual omission.

ENDORSEMENT OF OTHER SUBMISSIONS

- (7) The Society would, in addition to the above points, endorse those submissions made on behalf of CPRE and by Save our Silence Action Group (SOSAG).

NOISE

- (8) It is specifically noted that the consultation refers to aircraft being seen and, presumably heard, outside the holding patterns but this is not quantified in terms of numbers or the potential increase in ambient noise levels.
- (9) The consultation does not detail the increase in noise levels above existing levels that will be experienced by residents under the holding stacks. This, to the Society, is a more accurate and meaningful measure of noise rather than the absolute figures, quoted elsewhere in the consultation.

QUESTIONS

- (10) In respect of the consultation document, we are concerned to note that it does not appear to quantify or deal with what will happen if air traffic movements at Stansted are increased. This would raise the following questions:
 - (a) Will the number of aircraft using the stacks increase?
 - (b) Will a separate consultation be required if it is proposed ever to hold aircraft below 7000 feet?
 - (c) If the stack, is, in any way, re-positioned significantly, will communities be re-consulted?
 - (d) If the stack is more intensively used, will communities be re-consulted?

- (e) Finally, on the evening of Monday 9 June, an aircraft using the proposed new holding stack at approximately 18:15hrs was seen. Can you please confirm that the new proposed Stansted Eastern Hold stack is not, under any circumstances, already being used or is in operation?

I hope the above comments are useful and I look forward to your replies to the questions above.

Yours sincerely,

Richard Ward
Director
c.c. Andrea Davies – CPRE
Corinne Meakins – CPRE
CPRE Branches – Norfolk, Essex, Cambs.
Lyn Girling – Lavenham P.C.
Babergh Parish Councils
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David Ruffley, MP
Sir Michael Lord, MP