

Chilterns Under Threat – Opposing NATS Proposals

The changes to flight path routings through the Chilterns and Luton area of Terminal Control North (TCN) being proposed by National Air Traffic Services (NATS) will have a severe environmental impact on the Chilterns Area of Outstanding Natural Beauty (Chilterns AONB) and the surrounding area.

The consultation document issued by NATS can be viewed in full on their website but the significant effects of the proposals are summarised and discussed on The Lee village website (www.thelee.org.uk).

This document has been written to help anyone wishing to challenge the NATS proposals write effective letters of opposition. To be effective key 'stakeholders' such as NATS, the Director of Airspace Policy at the CAA, Government Ministers, their "Shadows", local MPs and Councils must be convinced that the NATS proposals for the Chilterns AONB and surrounding area are flawed, inadequate, and should be reconsidered and referred to the Secretary of State for the Environment as they fail to meet the regulatory requirements.

Summary of Arguments against the Proposals

The main arguments against the proposals are:

1. The consultation process is seriously flawed
2. NATS fails to justify their proposals on the basis of "safety, efficiency, environmental benefit or mitigating the environmental impact to the greatest extent possible".
3. The proposed flightpaths will have a much greater noise impact on the Chilterns AONB than current routings
4. The Chilterns AONB must be protected.
5. There are alternatives to NATS current proposals. These would obviate many of these objections.

How this document can help you

The remainder of this document includes:

- A series of numbered facts that cross-reference the above summary and support the main arguments against the NATS proposals. These can be used selectively to formulate letters of opposition. All you have to do is add your emotions! There is one caveat though; we have it on very good authority that 'stereotyped' letters do not carry as much weight as individually crafted responses so, to achieve maximum impact, **it is very important** that your responses are not just simply copied or 'cut and pasted' from the text, and that you introduce some variation.
- A list of the key stakeholders (in order of decreasing priority) at the end of the document. Please find the time to write; it is absolutely essential to write to as many as you can.

Please do not underestimate the impact these proposals will have. They are only the 'thin end of the wedge'; departures from Luton are due to double in the next five years and the proposal for a third runway at Heathrow will increase the number of flights from that source by 50% by 2020! We can only blame ourselves if we do nothing to challenge these proposals. If we don't the quality of life we currently enjoy will deteriorate even further.

1. The Consultation process is seriously flawed

- 1.1. The consultation document is very large and complex. It is also confusing and complicated, and the impact of noise is very hard to interpret. How are those without a computer meant to access it? Without public briefings many elderly people for example will be unaware of its existence, its consequences, and the opportunity to respond.
- 1.2. NATS has briefed and sought to persuade the most influential key stakeholders (e.g. MPs) but refuses to directly brief the general public, or organise and attend public meetings to answer questions and help interpret the consultation document and its implications.
- 1.3. A consultation period of only 13 weeks is therefore totally inadequate as it does not allow the public or organisations sufficient time in which to assimilate and assess the impact of the proposals, especially as NATS has had four years to prepare the proposals.
- 1.4. Several important stakeholders were never briefed e.g. The National Trust, The Chilterns Conservation Board. Who else has NATS ignored?
- 1.5. NATS is responsible for collating, filtering, and forwarding responses, to the CAA with a report. How can the Public be guaranteed that this will be an unbiased, objective and independent process?
- 1.6. NATS has only allowed a period of one month in which to produce a post-consultation report and respond to the feedback it receives. The public cannot be confident that NATS will be able to properly assess suggestions and objections and revise their proposals in such a short timescale.

2. The proposals are not justified on the basis of “safety, efficiency, environmental benefit and mitigating environmental impact to the greatest extent possible”.

CAA Guidance on the Airspace Change Process (CAP 725) says NATS must *“convince the Directorate of Airspace Policy at the CAA of the need for, and merits of, the proposed airspace change in terms of safety, efficiency, providing environmental benefits or mitigating its environmental impact to the greatest extent possible.”*

The CAA must also satisfy Government policy *“on reducing, controlling and mitigating the impacts of civil aviation on the environment; and the need to reduce, control and mitigate as far as possible the environmental impacts of civil aircraft operations; in particular the annoyance and disturbance caused to the general public arising from aircraft noise and vibration, and emissions from aircraft engines.”*

2.1. Safety

- 2.1.1. There is no detailed safety case in the consultation document.
- 2.1.2. NATS has not demonstrated why the current route structure is unsafe? Where is the evidence that supports NATS’ assumption that the proposed changes will make air travel safer?
- 2.1.3. NATS claims that safety will be enhanced if airspace capacity is increased – where is the evidence? The London Terminal Control Area (TMA) is already probably the busiest ATC environment in the world and these changes will increase the number of movements. Increasing capacity further simply allows more aircraft into the London TMA which quickly negates any improved safety benefits.
- 2.1.4. In the document NATS states that spreading traffic throughout the TCN will improve safety, but then admits that Air Traffic Controllers will still have to take traffic off the new routes to de-conflict them in order to maintain safety, so where is the benefit?

2.2. Increased Efficiency

- 2.2.1. Fact; aircraft will be lower over the Chilterns AONB than they are today as a result of NATS' proposals, and they will spend longer at between 3000ft and 4000ft on the proposed departure routes from Luton and Northolt. This means that they will burn more fuel, increase noise pollution and carbon emissions, and increase the overall environmental impact because NATS has failed to propose readily identifiable changes that would allow aircraft to climb more quickly and reduce these effects.
- 2.2.2. NATS estimates 30,000 hours of delay will be saved annually if their proposals are introduced. This equates to a mere 17 seconds per aircraft!
- 2.2.3. Delays are a function of many contributing factors. These are not just confined to the arrival and departure process in the UK. An aircraft can fail to arrive on time because it was already late when arrived late in UK airspace, and therefore has to be fitted into the approach sequence as an unplanned extra. Most are delayed on departure because of restrictions imposed further down the route. A detailed analysis of the causal factors is therefore required before any changes can be guaranteed to reduce delays. This is not provided and NATS is simply assuming that increasing capacity in the London TMA will automatically reduce delays.
- 2.2.4. The closer to maximum capacity an airport operates the less its ability to absorb the normal operational and environmental variations that cause delays e.g. average delays at Heathrow are the worst in the UK, as it operates at the limit of its capacity most of the time (note, however, that none of NATS proposals are designed to address the problems at Heathrow).
- 2.2.5. Increasing air traffic capacity might mean fewer delays in the short term at less saturated airports like Luton, however, there are no plans to restrict the number of aircraft movements, and so any benefits that occur from increasing capacity will soon disappear as airports and airlines expand their networks. NATS states that it is not responsible for and has no control over this, yet NATS is owned by a consortium that includes seven airlines and the BAA. Where is the benefit if these proposals simply store up more problems for the future? This is not a "joined up" approach to mitigating delay and managing capacity efficiently.

2.3. A severe environmental Impact

- 2.3.1. NATS has acknowledged in the press that aircraft noise is far more intrusive and distressing in a rural environment than it is in a busy town environment where ambient noise levels are higher and buildings help absorb and deflect it.
- 2.3.2. NATS has chosen to ignore that fact and did not seek to mitigate its impact in any way in the proposals, claiming:

"In previous consultations the CAA has accepted that measurement of aircraft noise in relation to tranquillity is relatively undeveloped and that no universally accepted metrics or measuring methodology exists for the assessment of tranquillity. Therefore it has not been possible to undertake tranquillity measurements for this project."

Simply ignoring this because no metrics are available is unacceptable. NATS has been working on these changes for four years and has had plenty of time to sponsor their development.

- 2.3.3. Hundreds of aircraft already transit through the Chilterns AONB and surrounding area every week at less than 7000 ft, which is the height defined by the government below which aircraft are deemed to be intrusive and to constitute an environmental burden. These proposals will make that burden significantly worse.

3. A much greater noise impact on the Chilterns AONB

- 3.1. Many parts of the Chilterns AONB are over 700ft above sea level, and NATS' plans for the Luton and Northolt departures mean that aircraft will be lower over the Chilterns AONB than they are today, and will spend unnecessarily long periods at a between 3000ft and 4000ft above the ground. The equivalent noise levels produced by NATS for aircraft at these heights on the proposed routes indicate levels of noise will vary between a car at 40 mph 23 feet away and a heavy diesel lorry at 40 mph 23 feet away.
- 3.2. In addition, NATS own figures anticipate that Luton departures between 6 am and midnight will increase to 10 aircraft an hour (one every six minutes) on the new routes. More night movements are also anticipated. There are no restrictions on the number of these. All this will have a dramatic impact on tranquillity.

4. A duty to protect the Chilterns AONB and the surrounding area

- 4.1. The Chilterns is one of 40 Areas of Outstanding Natural Beauty (AONB) and is designated by Government as worthy of special protection, and of equal status to National Parks. The primary purpose of AONB designation is set out at www.aonb.org.uk and is *"To conserve and enhance the natural beauty of the landscape."* Two secondary aims complement that purpose: *"to meet the need for quiet enjoyment of the countryside and to have regard for the interests of those who live and work there"*
- 4.2. The Rural White Paper (2000) stated *"protecting the countryside from further intrusion of noise is not a luxury. It is about preserving and promoting a feature that is valued by residents and visitors alike"*. EU Directive 2002/30 also requires Authorities to protect low noise environments.
- 4.3. Government policy states: *"Government policy will continue to focus on minimising over-flight of more densely populated areas below 7000ft. However, where it is possible to avoid over-flight of National Parks and AONBs below this altitude without adding to environmental burdens on more densely populated areas, it clearly makes sense to do so."* Government statistics have shown that over 50million day visits to the Chilterns take place each year and these are predominantly by people from London and nearby towns seeking the peace and quiet of the countryside.
- 4.4. NATS recognises in the consultation document that: *'The potential effect on designated AONBs, in which tranquillity and visual intrusion are particularly recognised concerns'* and has given protection to the Dedham Vale and Suffolk Coasts AONBs in its proposals, so why have they given no protection to the Chilterns AONB? Is it because it already has to suffer the significant environmental impact of aircraft noise, so adding more won't make any difference? NATS own assumptions indicate that 10+ aircraft an hour on top of current aircraft movements can be anticipated as Luton airport expands. When is enough, enough?
- 4.5. The government and the Dept of the Environment have a duty of care to protect and preserve the nation's AONBs for the benefit of the millions of visitors that use them each year and for future generations. If they allow NATS proposed changes to be implemented as they are they are failing to do so.
- 4.6. The Directorate of Airspace Policy should refer the proposals to the secretary of State for the Environment as the proposals for the Chilterns and Luton sector of the TCN provide a negative overall environmental benefit. NATS has failed to satisfy the requirement to *"Reduce, control and mitigate as far as possible the environmental impacts of civil aircraft operations; in particular the annoyance and disturbance caused to the general public arising from noise and vibration, and emissions from aircraft engines"*

5. There are better alternatives to NATS current proposals. These would obviate many of these objections:

- 5.1. Much more could be done to enable transiting aircraft to achieve higher altitudes over the AONB and areas of population - failing to do so increases the noise burden and carbon emissions as aircraft are more fuel inefficient at lower altitudes.
- 5.2. Move the Bovingdon holding stack further west. This would allow Luton and Northolt departures from all runway directions to climb much more quickly, reducing noise, carbon emissions and increasing safety. There would be no need to de-conflict them with Heathrow northbound traffic which could also climb sooner. This may have to happen anyway if Heathrow's third runway is built.
- 5.3. Expand the existing controlled airspace to the northwest of Luton so that Luton departures can be routed further north into the lower vale of Aylesbury and be allowed to climb more quickly.
- 5.4. Work with airlines to introduce changes to procedures that would enable heavier aircraft departing northbound from Heathrow in particular, to climb more quickly to reduce the conflict with Luton and Northolt departures transiting the Chilterns AONB. Examples include using higher climb power settings for longer and to a higher initial altitude, and extending specific Heathrow departure routes sufficiently to allow heavier aircraft more time to climb before turning northwards towards the Chilterns AONB.
- 5.5. Capitalise upon the ability of modern aircraft to navigate independently of ground based navigation aids (PRNAV) and to be programmed to follow more circuitous routes. PRNAV means aircraft do not need to be routed in long straight lines and departure routes can be redrawn to circumnavigate more centres of population to reduce the noise burden.

Key Stakeholders to write to.

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NATS via the Consultation Process at
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Or TCN Consultation, NATS, Freepost NAT22750,
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The Right Honourable Ruth Kelly MP
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