

Luton Airspace and Stack Changes

Luton Airport implemented a new flightpath and holding stack area across the northern part of South Cambridgeshire and into Huntingdonshire starting in February 2022. This was to ease the work of traffic controllers.

Traffic that previously flew over South Cambridgeshire to access the Stansted-Luton LOREL hold over Royston will now be re-routed towards Huntingdon.

It has resulted in an increase in air traffic over other parts of the area like southern parts of East Cambridgeshire, northern parts of the Greater Cambridge region and south east Huntingdonshire.

The proposal stated that overflying aircraft will be operating at a height of 11000-8000ft in these areas, and downplayed potential the impact on communities.

The Consultation Process was flawed

- SCDC (and County) officers were not invited by NATS to early stakeholder engagement sessions to the Option Appraisal process that took place in 2019, despite other authorities in the area being asked to attend.
- Though stack is in Huntingdonshire, it would also affect South Cambridgeshire. Our officers should have been involved to get better understanding of what alternative options were and how they might have delivered similar outcomes without creating local concerns for villages in our district.
- The two options developed by NATS and LLA result in holding stacks of air traffic sitting **at or above 8,000ft** over parts of Huntingdonshire and South Cambridgeshire
- The second option included a number of predetermined arrival flightpaths which aircraft could fly automatically and without intervention by controllers. This was their preferred option because it would reduce air traffic complexity more than the first option
- Options were not real options
- Public consultation was virtually only from 19 October 2020 to 5 February 2021, much of that time was during pandemic lockdown when people were concentrating on more important stuff.
- The Councils asked for more data, but NATS and LLA did not provide it.
- Luton Airport is undergoing a DCO from the Planning Inspectorate to expand the Airport. The airspace changes is not included in that DCO process. Which means the airspace change is only considering current or pre-covid traffic levels, and not the increased air traffic flights that will occur if the airport gets the permission.
- So there is a misrepresentation going on even in their expansion plans to the Planning Inspectorate. This by extension also means the residents living under the new airspace routes are being misled as to the traffic levels to expect.

- **The Councils therefore felt that the consultation should be redone in order to rectify this inadequacy**

Consultation data was woefully inadequate

- Consultation documents were **impenetrable, difficult to read**.
- No “pre-determined” arrival paths were identified either for the second option, so no idea where aircraft could fly automatically with say so from the Controllers.
- It downplayed the potential impact on local communities
- Communities could not understand the potential adverse impact the proposals could have on them with regards to noise
- No noise maps for the proposed holding area were provided
- limited data on the proposed number of expected flights using the holding area
- No data on what the air traffic flight levels were pre-pandemic over this area. So it is impossible to evaluate or quantify the impacts of the proposed new flight corridors created as a result of the proposals
- It was difficult to robustly assess the potential impacts on communities and their quality of life.
- One major point to note is that according to the consultation material, the village of Gamlingay was going to be the most affected in South Cambs. But that is not what is happening now. Flights are being re-routed across villages in my Ward-Caldecote, Bourn, Kingston, Longstowe and Little Gransden, the last two being closer to Gamlingay than the others.

Impact of Airspace Changes now

- Placing significant noise nuisance over peaceful rural area has a much more serious impact than over noise more populous or infrastructure areas
- It is especially important as most of this area is rural and ambient noise levels are low.
- Exposure to loud noises can have a detrimental and adverse impact on people’s quality of life. It is causing significant disturbance to local communities with negative effects on people’s health, sleep, mental health and general wellbeing
- It is impacting the right to enjoyment of homes and gardens
- Noise pollution also impacts the health and well-being of wildlife.
- Resident groups are trying to get the data that should have been provided during the consultation and Luton is refusing
- LAA is not subject to FOI and will not share data
- Their noise monitoring kit does not work in rural areas
- Aircraft was not supposed to fly lower than 8000 ft across these areas, but they are. We know that because we can see the painted logos on them if we are outside in our gardens.
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Impact on Climate Change/Net Zero

In 2019, the UK became the first major economy in the world to pass laws to end its contribution to global warming by 2050. The target requires the UK to bring all greenhouse gas emissions to net zero by 2050.

The Airspace Consultation document stated that the average LLA arrival in 2022 is expected to increase fuel use by c.89kg, as well as emitting c.285kg more CO₂e

- Some of the noise being heard now especially on the new routes is of the air planes breaking as they come in to land, emitting more CO₂e. The sound of the airbrakes is a whining sound as the aircraft descend.
- Airport expansion and increase in flights will only increase fuel and emissions

Conclusion

- We want the post-implementation period to increase to 31 May 2024
- LAA and CAA to provide pre-implementation data to the residents and councils to enable them carry out proper assessment
- Provide better equipment to monitor the noise levels at more areas across the county
- The CEO of LAA to ensure full access to residents teams
- Compile the complaints being sent in by residents and not send “standard template form responses”

Response from Richard Taylor, Communications Department, Civil Aviation Authority on to Bridget Smith's Letter of 8 July 2022

Thank you for your emailed letter of 8 July 2022 in which you **raise concerns about impacts of the revised flight path** sponsored jointly by London Luton Airport and NATS (ACP-2018-65). You **ask for advice on whether the new flights are complying with the original proposal** and also for **clarification on the Post-Implementation Review process**.

- sponsors undertook a comprehensive consultation exercise between 19 October 2020 and 5 February 2021
- publicised social media, trad methods, TV & newspaper
- received 2,453 responses
- The change co-sponsors (London Luton Airport and NATS) commenced their 12-month data collection on 1st June 2022, and due to end 31st May 2023
- The PIR requires one year's worth of operational data to be analysed and supplied to the CAA

The objective of a PIR is to establish whether the impacts and benefits of the change are as anticipated

While community feedback will be taken into consideration in our analysis, the PIR (Post Implementation Review) does not constitute a re-consultation of the original proposal; our focus throughout the Review will be to determine whether the ***change has delivered the benefits and impacts as was originally intended.***

Outcome of PIR

- Confirm
- Require modification
- Not confirmed- LAA request another change request

As it stands, aircraft noise is not a statutory nuisance in the UK, and it is specifically excluded from the Environment Act.

We are working hard to encourage the aviation industry to reduce its environmental impact