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The Mayor's Office
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Dear

National Air Traffic Services: Change to London Luton Airport Arrivals

The CPCA welcome the opportunity to respond to this consultation and would appreciate the opportunity for on-going dialogue with London Luton Airport (LLA) and the National Air Traffic Services (NATS) to help resolve the issues outlined in this response. We note the current growth and health and safety concerns with the current flight paths and welcome proposals to combat rising delays and improve resilience to benefit passengers, businesses, and the local economy. These proposals are likely to support growth across the Cambridge-London corridor and are therefore in line with our growth ambitions set out in the CPIER; however, there are several concerns that need to be addressed in a timely and effective manner.

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 Airspace Consultation Document notes that the typical noise in decibels (LAmax dB) that an observer on the ground might expect to experience from an arriving aircraft between 7,000 – 8,000ft would be 59-57 for a Turboprop aircraft.

However, the consultation documents did not provide sufficient clear information to allow individuals and/or communities to understand the potential adverse impact the proposals may have on them with regards to noise. No noise maps for the proposed holding area were provided within the consultation material and limited data on the proposed number of expected flights using the holding area was made available. It is therefore difficult to conclude the potential impacts on communities and their quality of life. Further information on the impacts of the proposed options is therefore sought from NATS and LLA to allow for a true assessment to be undertaken in a timely manner.

The CPCA is concerned by the potential impact the proposals may have on a large area of Cambridgeshire which are not currently impacted by aircraft noise. Exposure to loud noises can have a detrimental and adverse impact on people's quality of life.

This area of Cambridgeshire is largely tranquil and quiet in nature. The proposed stack will potentially cause significant disturbance to local communities with negative affects on people's health and wellbeing. Noise pollution also impacts the health and well-being of wildlife. Many animals use sound for a variety of reasons, including to navigate, find food, attract mates, and avoid predators. A significant number of tranquil sites will be adversely affected, for example, the proposed options centre over the Grafham Water. Within the *Huntingdonshire Landscape and Townscape Assessment Supplementary Planning Document* this area is described as "a landscape with a strong 'sense of place'. It is a unique landscape within Huntingdonshire,

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dominated by open water. From any viewpoint on the reservoir or the shore, the dominant element in view is the open water. The water changes in appearance and character depending on the weather”.

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, compared with the previous target of at least 80% reduction from 1990 levels. However, it was noted in the Airspace Consultation document that the average LLA arrival in 2022 is expected to increase fuel use by c.89kg, emitting c.285kg more CO₂e.

Mitigation measures are required to minimise the adverse impacts (increased noise and air pollution) expected from the changes proposed. To deliver the correct mitigation measures, it is important that LLA and NATS actively engage with local communities and businesses, including the Jockey Club and the horse-racing industry to ensure that their needs and concerns will be addressed in an effective and timely manner.

To conclude, LLA and NATS need to consider the impacts that the revision to the holding patterns will have on the residents of Cambridgeshire and those on the flight path. If the proposed options are agreed and implemented, it is imperative that due mitigation is provided. The CPCA would therefore welcome an on-going dialogue with LLA and NATS in advance of the formal submission of an Airspace Change Proposal to the Civil Aviation Authority in June 2021.

Yours sincerely,

James Palmer
Mayor of Cambridgeshire and Peterborough

