

My ref: GH/AIR/096

Your ref:

Date: 02 February 2021

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**Place & Economy**

Graham Hughes

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Ms Nicole Morris  
Via email

Dear Ms Morris

**London Luton Airport – Proposed Changes to Airspace - Response by Cambridgeshire County Council**

In response to your online consultation materials, I have set out in the attached schedule comments representing Cambridgeshire County Council.

There has been significant interest in the proposals from Cambridgeshire County Council. The consultation was raised at a meeting of Full Council on 15<sup>th</sup> December as a Written Question and this response has been approved by key Members representing the Council as a whole on this matter. Please accept this letter and supporting schedule as the formal consultation response of the authority.

In response to the aforementioned Written Question, Council resolved to ask Executive Director of Place & Economy, Steve Cox, to request more detailed information from NATS and Luton Airport on how the proposals affect particular areas within the county. The County Council was disappointed to see that the response, received on 26<sup>th</sup> January, provided no further information beyond that which officers already had access to in the consultation materials, and that the specific requests for information were side lined in favour of a high level response. It is worth stressing that the County Council requested this information so that it could come to an informed decision about the proposals and evaluate the impact the proposals would have on particular communities. Without this level of detail, the County Council feels that insufficient data has been provided to robustly evaluate the proposals and feels that the consultation should be redone in order to rectify this. However, should this decision not be taken, we request that the attached comments are taken into account based on the evidence we do have.

You will note that the County Council has expressed concern at the manner in which these proposals have been consulted upon. Officers from NATS confirmed in a meeting on 8<sup>th</sup> January that Cambridgeshire County Council was not invited to stakeholder engagement sessions which informed the Stage 2a Option Appraisal process in 2019, despite other authorities in the area being asked to attend. In terms of the two options that have been presented around the holding stack at Huntingdon, the County Council would have liked to have been involved much earlier in the process to understand the alternatives for the location of this stack and how they might have delivered similar outcomes without creating local concerns for Cambridgeshire.

The County Council has concerns that the consultation material for the Airspace changes is divorced from the parallel process for a Development Consent Order for the expansion of Luton Airport. In so doing, the consultation is predicated on existing air traffic trends and forecasts. The data underpinning the consultation material is only fit for purpose in the scenario where the predicted forecasts as a result of further Luton Airport expansion remain

static. However, increased patronage resulting from the expansion may present a very different reality.

You will understand that the increase in the number of overflying aircraft as a result of the expansion of Luton Airport is a material consideration for the County Council. As such, the views expressed in this consultation response in relation to the current and predicted number of flights should not be construed as acceptance of as yet unconfirmed numbers of additional flights associated with the expansion of Luton Airport. The County Council must therefore reserve its position on both the expansion proposal and any consequential implications it might have for the impacts of the proposed changes to airspace contained in the current consultation, as they affect airspace in much of Cambridgeshire. We would therefore welcome confirmation that the consideration of airspace and overflying will be a consideration in the DCO process, or that a further consultation on airspace will be undertaken on the increased number of flights associated with the Luton Airport expansion.

Notwithstanding the above, the County Council acknowledges the impact on airspace that the proposals will have in the south of Cambridgeshire. In relocating the hold to Huntingdon, traffic that previously flew over South Cambridgeshire to access the Stansted-Luton LOREL hold over Royston will now be re-routed towards Huntingdon. As such, the proposals for current flight numbers, would reduce air traffic over the majority of airspace in the south of Cambridgeshire, which is welcomed.

The County Council, however, is concerned that the rerouting of arrivals from the LOREL hold to the Huntingdon stack will result in an increase in air traffic over other parts of the county, namely southern parts of East Cambridgeshire, northern parts of the Greater Cambridge region and south east Huntingdonshire. Whilst it is acknowledged that overflying aircraft will be operating at a height of 11000-8000ft in these areas, this still has the potential to impact on these communities. The Council is therefore very concerned at the limited availability of data provided in the consultation proposals to evaluate the exact impact on communities living underneath this flight corridor. Indicative figures are provided in the consultation document for estimated arrivals in 2022 and 2032, but there is no apparent means of comparing these figures to present day pre-pandemic levels on specific corridors, particularly new flight corridors created as a result of the proposals. Furthermore, it remains to be seen what the impact of an expansion at Luton Airport will be on these routes. We would therefore expect further engagement and consultation in order to fully assess this impact and comment on whether this re-routing is still fit for purpose.

It is also acknowledged that flights will be directed over the village of Gamlingay which lies underneath the proposed 'funnel'. However, while Gamlingay will witness an increase in flight traffic, officers are unable to ascertain the specific level of the increase and consequently provide a robust evaluation of how the proposals will affect the village. As Gamlingay is the village most likely to be affected by the proposals, given the rerouting of air traffic, and the lower altitude at which they will be operating, this point is especially pertinent. It is however noted that aircraft will fly at a higher altitude of 7,000ft-6,000ft than the altitude present-day pre-pandemic flights currently fly at over the village, which is welcomed.

The council also recognises that while the proposed holding stack is situated over the key market town and district of Huntingdon, planes will fly no lower than 8000ft feet while in the stack and believe this to be compliant with government guidance on the matter. However further detail about the specific impact of noise pollution on the town would be strongly welcomed, as this is not clear from the consultation documents.

In summary, while the overarching aims of the proposals are understood and welcomed at an initial high level, the County Council feels that the manner in which the consultation has been undertaken, combined with a lack of relevant data around the impact on towns and villages which lie under the new flight paths, has prevented it from being able to robustly analyse the

proposals in an appropriate level of detail. Therefore we request that the consultation process is revisited, with a greater emphasis on engagement with stakeholders in the area and a greater willingness to provide an appropriate level of data that allows us to analyse the proposals satisfactorily.

Please contact me if you need any further information regarding our responses.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Graham Hughes', written in a cursive style.

Graham Hughes  
**Service Director, Highways and Transport**