

Dear Ms Morris

London Luton Airport – Proposed Changes to Airspace
Response by South Cambridgeshire District Council

In response to your online consultation materials, I set out in this letter comments to your proposal from South Cambridgeshire District Council.

Huntingdon Stack Option

The Council is disappointed in the way in which the consultation has been handled. Officers from the Greater Cambridge Shared Planning Service (GCSP) along with Cambridgeshire County Council expressed concern at the manner in which these proposals have been consulted upon at a meeting with NATS officers on the 8th January 2021. At this meeting NATS representatives confirmed that neither authorities were 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. We would request that the Council is invited to attend any future relevant meetings.

In terms of the two options that have been presented around the new holding stack over the Huntingdon area, the introduction of which will have an impact upon the South Cambridgeshire area, the Council would have liked to have been involved much earlier in the process. This would have allowed us to better understand the alternatives for the location of this stack and how they might have delivered similar outcomes without creating potential local concerns within our area.

Development Consent Order Process

The 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 material is predicated on existing air traffic trends and forecasts. However, increased patronage resulting from the expansion may present a very different reality. The evidence underpinning the consultation material is therefore only fit for purpose in a scenario where the predicted forecasts as a result of further Luton Airport expansion remain static.

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 Council. As such, the views expressed in this consultation response in relation to the current and forecast 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 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 Greater Cambridge. 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.

Consultation Material

Notwithstanding the above, the Council acknowledges the impact on airspace that the proposals will have in the southern parts of Cambridgeshire. In relocating arrivals to Luton Airport to the proposed new holding stack over the Huntingdon area, some 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 is likely to reduce air traffic over much of the airspace in the south of Cambridgeshire. This is welcomed.

Unfortunately, the tenor of the Council's consultation response is guided by the limited availability of quantitative data provided in the consultation material. This lack of information has made it difficult for us to evaluate the exact impact on communities living beneath the proposed Huntingdon to Gamlingay flight corridor.

Whilst indicative figures are provided in the consultation document for estimated arrivals in 2022 and 2032, there is unfortunately no apparent means of comparing these figures to levels before pandemic restrictions reduced the number of flight movements. As a result, we are unable to quantify the level of percentage increase in the number of flights through the Huntingdonshire to Gamlingay corridor and by extension the scope and quantity of impacts this may have. This is of particular concern when assessing the impacts of this rerouting on the village of Gamlingay which lies beneath the proposed funnel.

Noise

Focusing on areas within South Cambridgeshire, it is noted that aircraft affected by the proposal will fly at an altitude of 8,000ft to 7,000ft and 7,000ft to 6,000ft over the Gamlingay area. It is also noted that the LLA Consultation Document states that aircraft noise can be less distinguishable at altitudes higher than 7,000ft depending on local circumstances thereby implying that under 7,000ft aircraft noise can be discerned particularly in more rural communities.

On this matter it is recognised that Government guidance stipulates that if an aircraft is between 4,000ft-7,000ft in height, minimising the impact of aviation noise should be prioritised unless this disproportionately increases CO2 emissions.

As a result, we are concerned that there appears to be no data in the consultation material quantifying the increased percentage of flights over Gamlingay and the corridor as a whole. As a result, the cumulative impact that an increase in flights may have on the amenity of these residential areas is hard to ascertain.

We would like to point out that significant local concern over the above proposal has been voiced by the local communities in this area and that in a wider context our Huntingdon district colleagues have requested additional information on noise pollution as they believe the true impact of the proposal is not clear from the

consultation material. This is despite the proposal that flights will fly no lower than 8000ft in the Huntingdon Stack.

Air Quality

It appears unlikely that there will be any impact on Air Quality Management Areas in South Cambridgeshire as a result of these changes. Growth of over flying aircraft, however, may be seen as contrary to National Indicator 194 (reduction in NOx through local authority operations).

Climate Change, Landscape and Biodiversity

While direct impacts may be unlikely, there is a potential indirect adverse impact on climate change, landscape and biodiversity through emissions from planes circling over Greater Cambridge and consequent increases in CO2 levels. Climate change effects would, of course, be felt wherever the stacks are located and it is accepted that placing them in the most efficient configuration for the anticipated air traffic will reduce these effects. Notwithstanding, it is acknowledged that CO2 emission levels will be exacerbated in the Greater Cambridge area by the additional aircraft flying over its area as a result of the extra airspace location and the trajectory these flights will take in order to arrive at Luton Airport. Indeed, by introducing another stack in this location a more significant impact may be realised as a result of the potential expansion of Luton Airport, for which GCSP would expect additional detail on these issues if those proposals are progressed.

Conclusion

As a result of the above considerations, the Council is not sufficiently reassured at this point that the proposal will not be harmful to the amenity of residents of the district and urges NATS to do more to engage with the Council and concerned local communities.

Yours sincerely,

Stephen Kelly
Joint Director of Planning and Economic Development
Greater Cambridge Shared Planning Service