



The countryside charity
Bedfordshire

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Airspace Change
Flight Operations
London Luton Airport
Percival House, Percival Way
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2nd February 2021

Dear Sirs,

Proposed Changes to London Luton Airport Arrivals – Response to Consultation

CPRE Bedfordshire (CPRE) strongly object to the proposed London Luton Airport (LLA) Arrivals changes.

Our main concerns are over: -

- Loss of Tranquillity through Noise Pollution
- Noise and impact on Health
- Prematurity
- Trust
- Climate Change and Air Pollution

We have expanded on these and why we consider the proposals should be rejected below.

1. Loss of Tranquillity through Noise Pollution

The proposed new London Luton Airport (LLA) arrivals hold and approach route would be positioned over an area that is largely tranquil with minimal background noise as confirmed in relevant Local Plan documents. There is currently little aviation activity here and it is at high altitude. Many people have chosen to live in this area based on its tranquillity and the impacts would be great and annoyance significant.

The consultation does not provide enough information to allow communities to understand the noise impact this proposal would bring – there are no noise maps for the hold or information on the frequency and volume of overflights. NATS admits that holding stacks are noisy and yet this is not made clear in the consultation documents.

As aircraft leave the stack or bypass the stack into the proposed ‘funnel’, those living under the flightpath would be severely effected with frequent, concentrated overflying. This includes the communities of Potton, Abbotsley and Gamlingay and an area East of Sandy.

This area form part of the Greensand Ridge one of the Region’s most important Nature Improvement Area, which includes in this location several nationally important (SSSI and NNR) designated areas.

2. Noise and impact on Health

CPRE believes invasive noise will be felt from any aircraft flying below 10,000 ft. The proposed new routes mean that aircraft would be flying over communities that have previously enjoyed relative tranquillity, where overflying will cause a greater effect because of the absence of other background noise.

In addition, the Option 2 proposals to create PBN routes across Bedfordshire will create corridors of intense noise and activity, blighting both rural areas, communities and areas currently allocated for housing such as around Biggleswade. Table 6 of the consultation document implies that there will be around at least 1 flight every 5 minutes during peak times, and this assumes no expansion of the airport. This will include areas such as Potton and Gamlingay which previously had no air traffic at this level.

The impact on communities when the easterly runway is used will be equally severe with impacts on many settlements including Shefford, Meppershall Langford and Harlington.

The CPRE report “Flight Blight - The Social and Environmental Cost of Aviation Expansion” highlights the negative impact of aviation noise.

(<https://www.cpresussex.org.uk/wpcontent/uploads/sites/16/2020/02/FlightZBlightZCPREZNAvGZFINAL.pdf>).

In the Executive Summary CPRE highlights the issue of aircraft noise.

*“For many people, aircraft noise is a real problem. Research shows that aircraft noise is more annoying than road or rail noise and that we are becoming **increasingly sensitive to it**. Tolerance to aircraft noise is about more than the noise level, non-acoustic, socio-psychological factors play a key role, including expectations. If you are expecting peace and quiet, for example in the countryside, then noise is much more annoying. People who trust an airport find aircraft noise less annoying. **Other European countries monitor and report at lower noise threshold levels than the UK as this better reflects people’s experience of aircraft noise.**”*

CPRE is concerned that the consultation documents do not provide enough clear information to allow individuals or communities to adequately and easily understand the impact the proposals will have on them with regards to noise. The noise maps in Appendix D and E are illegible. There are no noise maps for the proposed holding area, the area south of the hold and approaching Potton and the area East of Sandy, and no data to show the expected number of flights using the holding area. Therefore, it is not possible to be able to adequately interpret how communities’ experience of noise will change.

CPRE are therefore extremely concerned about the impact on the health of a large part of the population of Bedfordshire and Cambridgeshire. The World Health Organisation has said that aircraft noise above 45dB in the day and 40dB at night are associated with adverse effects on sleep and health. The economic costs of noise are known to be significant and to include major cost to the health services as well as significant loss of life-years.

3. Prematurity

In 2010 NATS withdrew proposals for an air holding stack over Cambridgeshire due to the downturn in air traffic as a result of the financial crisis and while a review of the airspace in Southern England was being undertaken.

The Future Airspace Strategy South (FASI-S) has now been paused as a result of the COVID-19 pandemic which has seen a massive drop in air traffic of over 67% Levels are not predicted to return to 2019 levels until at least 2024/5.

With the current downturn in the aviation industry due to the pandemic, as stated above, LLA’s Chief Executive has predicted a 70% reduction in passenger numbers compared to 2019.

Confirmed reductions to date include August 2020 56%, September 2020 66%, October 2020 82% and November 2020 90%. (<https://mediahub.london-luton.co.uk>).

The current global situation is far worse than in 2010. CPRE believes that similar but increased economic pressures now apply and consequently there is no justification to continue with the proposed Hold and flight path changes now.

The consultation we strongly believe is incorrect in its assumption traffic will return by 2022. The CAA has said if an Airspace Change Proposal is based on pre-COVID-19 levels/forecasts it will need to decide if it is still justified.

The proposal of a new holding stack is an out of date concept which conflicts with wider government aviation policy. The consultation says the technology is not available at Luton yet – but CPRE argues there is a great potential for it to be available by the time aviation grows again. If aviation does return to pre-2019 levels there is time to implement these technologies, incorporating FASI-S and the Single European Airspace. LLA in its DCO submission states airspace redesign will be subject to consultation with local communities prior to a final design in 2024. CPRE therefore argues these proposals at this time are premature and should be withdrawn. CPRE strongly believes that proceeding with the proposed Luton Airport Arrivals changes is not justified in these circumstances.

Therefore, these proposals too should be withdrawn now in order;

- To allow the outcome of the Future Airspace Strategy to be delivered.
- To understand the impact of the pandemic on aviation.
- To ensure compliance with UK climate policy and legal obligations.
- To fully embrace new technology.

4. Trust

The pandemic has meant there has been limited facility to ensure wide consultation engagement. This consultation is purely digital in nature, with no face to face exhibitions, and has not been widely advertised. Some of the documents are very large, including the map, and those on slow broadband would have difficulty in accessing them. Those without access to broadband would not be able to access the consultation material at all. This digital divide is of concern.

Also due to the pandemic many parish council meetings have had to be cancelled, and face to face meetings are restricted, even between neighbours during a lockdown. The ability for local communities to share information on this consultation and discuss its impacts on their communities is severely impacted. There will be many people who will not be aware of the consultation.

The survey itself does not ask a question on the proposed hold and Question 5 gives no choice to select 'Object' or 'Neither' and is subjective in asking responders to select a preference from only Option 1 or 2. It is therefore a biased and weighted question which, when the data is collated, may not show the actual true reflection of the responders.

The noise data and impacts for those within the proposed hold area are inadequate and at best misleading. It does not come across as being open and honest.

The noise data that is provided is difficult to navigate and not easy to understand. It obscures the impact of frequency, cumulative, seasonal, day/night etc. The noise maps provided in the consultation document are not legible with no geographic locations discernible.

The main consultation document contains confusing and contradictory information. For example, Para 5.48 states

To the east of Sandy, aircraft would be descended to 5,000ft and turned right (in the vicinity of Biggleswade or Henlow), mostly north of the A1-A505 junction near Letchworth similar to today. The LLA arrival flow continues west, level at 5,000ft for about 40km, over the northern part of the Chilterns AONB, with the controller vectoring most aircraft south of Leighton Buzzard (but some may be vectored to the north).

However, the associated maps show the area East of Sandy as being within the 6-7,000 ft altitude band.

When making airspace changes that will cause significant impact on communities, currently not impacted by aviation noise, people should be clearly able to understand what the impact would be to them and CPRE does not believe the current consultation adequately allows this.

5. Climate Change and Air Pollution

The UK's Net Zero Carbon target has been incorporated into law. (June 2019) The Government has recently announced that we shall increase the speed of progress towards that target (by achieving 68% of the reductions in emissions by 2030). Moreover, the Committee on Climate Change (CoCC), Parliament's statutory adviser on the implementation of carbon commitments, has stated **there is no room in the next "carbon budget" for any expansion in the UK's net aviation capacity.**

CoCC has made clear recommendations to Parliament in order to reduce the polluting emissions arising from aviation, which until the pandemic, continued to increase. These included demand-side measures, i.e. measures to reduce flying and a review of the UK's airport capacity strategy considering COVID-19 and Net Zero, including a household & business survey of long-term travel expectations.

None of the CoCC recommendations has been considered by LLA or NATS.

6. Conclusions

For all the above reasons, CPRE believes that the Proposed Changes to London Luton Airport Arrivals must be withdrawn immediately.

Yours faithfully,

S Lynch

Susan Lynch
Trustee CPRE Bedfordshire

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Rachel Hopkins MP
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