



Flight Path Changes



National Air Traffic Services (NATS) Airspace Change Proposals: Terminal Control North – Luton Airport

In 2008 NATS published proposals to change aircraft routes over a large part of South East England known as Terminal Control North. This principally affects take-offs and landings at Heathrow, Stansted, Luton and London City airports.

The proposed changes at Luton would have a significant impact on the village of Wheathampstead and the surrounding area. They include changes to the flight routes for aircraft leaving Luton Airport in an easterly direction. Those heading for destinations to the south west currently turn sharply right shortly after take-off and fly to the north of Wheathampstead. Under NATS' proposals, these flights would turn less sharply and pass over south east Wheathampstead and Nomansland Common.

Following a public meeting in the Memorial Hall organised by WDPS and District Councillor Judy Shardlow, we submitted objections to the proposed changes, calling for Luton easterly departures to the south west to be allowed to follow a much wider, dispersed route over Wheathampstead, so that aircraft noise would be spread over a wider area, rather than being concentrated over a narrow path. We also suggested that departures from Luton could reach higher altitudes more quickly, with obvious benefits for those living under the flight paths, if the Bovingdon 'hold' for aircraft queuing to land at Heathrow were to be moved a few miles to the west. This would also enable long-haul northbound departures from Heathrow, which currently pass over south west Hertfordshire, to track further west at higher altitudes.

NATS had so many objections to their proposals - about 15,000 from representative bodies, environmental groups and individuals all over the



South East - that they have announced that revised proposals are being considered for some of the routes and holding areas. These revised plans will be issued for public consultation some time after July this year. We do not know at this stage whether any of the revisions will affect Wheathampstead.

As soon as NATS' further changes are published, we will be examining them critically to see whether there are any advantages or disadvantages for Wheathampstead. No doubt the revised proposals will be reported in the national and local Press

Grounds for objection

The reasons for objecting to the NATS proposals can be summarised as follows:

- The basic reason why the CAA should accept a change has to be that continuing to use the current airspace structure would pose a threat to safety, but nothing quantifiable is said about improved safety.
- The consultation period (13 weeks) is too short to allow meaningful public consultation on such complex proposals.
- NATS have refused to attend any public meetings to explain the proposals, and are not answering questions put to them during the consultation period.
- Why are there no alternative proposals offered? A true consultation would include alternatives.
- The real purpose of the proposals is to enable further growth in air traffic to be accommodated (but NATS are not admitting this).
- There is no current objective data on aircraft noise to enable a proper assessment of the impact of the proposed changes on rural areas to be assessed. The proposals should be shelved until the Noise Advisory Council work has been updated.
- Aircraft noise over countryside such as that around Wheathampstead is more noticeable and more annoying because of the low background noise levels.
- These tranquil areas are precisely the places people want to visit for peace and quiet – not to experience frequent, intermittent, noisy events overhead.
- Rather than concentrating the flight paths in a narrow band around Wheathampstead and other areas on the proposed new Easterly departures to the South West route, it would be better to allow them to disperse over a wider area, so that the noise nuisance is shared.
- Luton Airport has become a 'city' airport – on the edge of a conurbation surrounded by other urban areas – so it should be treated the same as other such airports, with a night-time and weekend curfew.
- The consultation document significantly under-estimates the number of people who will be overflown, by not including the thousands of new homes proposed around Stevenage, Luton, Hemel Hempstead, etc.
- P-RNAV is not being introduced on the Luton Easterly route to the North (for unexplained reasons), so why is it necessary to do so for the Easterly route to the South West?



- Why have NATS not considered moving the Bovingdon stack (for Heathrow) further west, in order to provide more airspace for Luton Airport?
- In summary ... The case is not made according to the CAA rules and so must be refused.

WDPSS's response

Wheathampstead and District Preservation Society June 2008

**WHEATHAMPSTEAD AND DISTRICT PRESERVATION SOCIETY (WDPSS)
RESPONSE TO NATIONAL AIR TRAFFIC SERVICES (NATS)
CONSULTATION DOCUMENT ON PROPOSED CHANGES TO AIRSPACE
TERMINAL CONTROL NORTH**

1. Inadequacy of the consultation process and the evidence base

We do not believe that this consultation complies with the CAA's Guidance on the Application of the Airspace Change Process (CAP 725). This requires consultations on proposed airspace changes to justify options and proposals in detail. This document does not provide options (defined in most recognised dictionaries as choices open to selection, alternative possibilities). Instead, it presents us with a *fait accompli*: NATS have been working on these proposals since 2004 and these are their conclusions – take it or leave it.

NATS claim that it would have been too complex to present all possible options for public consultation, and that these proposals have been tested during the preparation process by consulting aviation stakeholders and local authorities. This is all very well, but this is the first time the general public have had an opportunity to comment on proposals that are intended to be implemented in about 9 months' time. By their very nature, these proposals are socially divisive and will have a severe impact on a large number of people who have not experienced these impacts before and have not been pre-conditioned to expect that they would have to suffer them in the relatively near future.

Not only are there no real options (ie, alternative choices) presented, but insufficient evidence is provided to justify the proposals that have been put forward. The environmental analysis and impacts section is particularly deficient in this respect. Aircraft noise and noise measurement, and people's perception of aircraft noise, are not particularly well developed branches of science. The presentation in this document of Leq noise exposure contours only down to 57 dB_(A) suggests that the area around airports seriously affected by aircraft noise will be fairly limited. Yet the proposed introduction of P-RNAV



(Precision Area Navigation) on some routes will have the effect of concentrating noise along relatively narrow corridors extending much further out from the airport, thus exposing the people in those corridors to noisy and more frequent events. NATS do not appear to have made any effort to measure the consequences of this for the people concerned.

Nor is there any evidence of objective research having been carried out into the relationship between aircraft noise and local ambient noise levels. It is obvious that rural areas and villages experience much lower ambient noise levels than cities, towns and motorway corridors. The objective of avoiding, as far as possible, areas of high population and flying over areas that are less well populated, therefore, has the effect of increasing the annoyance and disturbance caused to those people who do experience it. Simple counts of population overflow do not give a true picture of the environmental impact of the proposed new routes. More research on this is needed following the 2007 ANASE (Attitudes to Noise from Aviation Sources in England) report for the Department for Transport.

2. Limited scope of this consultation with particular regard to the Bovingdon hold

This TCN consultation deals mainly with Luton Airport arrivals and departures, Stansted arrivals and some departures, some London City arrivals and departures, all Northolt departures, and Heathrow departures heading north or north east. It does not deal with arrivals at Heathrow or Northolt. We consider that this is a serious deficiency of this study. The Bovingdon hold for arrivals to Heathrow Airport is located too close to Luton Airport and has a significant 'knock on' effect on arrivals and departures at Luton. In our view, this should have been taken into account at an early stage of the study and consideration given to moving the Bovingdon stack significantly further westwards in order to create more room for Luton. Indeed, there is an argument that the question of the Bovingdon hold should have been resolved before these TCN proposals were formulated.

The existence of the Bovingdon stack means that Heathrow easterly departures to the north fly further east than they would otherwise do – over south west Hertfordshire and closer to Luton Airport at about 6,000 feet. This forces departure traffic from Luton to be kept lower for longer, with obviously detrimental consequences for those areas beneath the Luton departure flight paths.

3. Effect of the proposals on Wheathampstead

Wheathampstead is a large village of about 6,500 people to the north of St Albans, midway between Harpenden and Welwyn Garden City. Luton easterly departures to the south west currently fly mainly over the northern side of Wheathampstead. Under the new proposals, these flights will pass



over the southern side of the village, over Nomansland Common, through the narrow gap between Wheathampstead and Sandridge. This route will be much narrower and more concentrated than the current route due to the introduction of P-RNAV. This means that a relatively tranquil area, highly valued for the opportunities of relaxation and recreation that it offers to the surrounding urban areas, will suffer a disproportionate amount of aircraft noise.

We are concerned that, in practice, many more flights than at present will pass directly over Wheathampstead because of the temptation for pilots to take a direct line from Ayot St Peter to the area to the north of Hemel Hempstead. This is likely to happen because once aircraft attain 3000 feet, just before reaching Wheathampstead, it will be possible for Air Traffic Control to give them a more direct heading.

It has been suggested that this situation could be ameliorated by aircraft being required to make a slightly wider turn to pass further south of Wheathampstead, but we do not believe that this is a practical solution, due to the proximity of Sandridge and the northern edge of St Albans. We would prefer the Compton 08 route to be more dispersed, within the parameters of the northern edge of the existing route and the southern edge of the proposed route. This could be achieved by not introducing P-RNAV on this route. We note that the CAA requires all new or changing routes to use P-RNAV, but this is not being proposed for Luton easterly departures to the north, for reasons that are not explained in the consultation document, so we see no imperative to introduce it on the Compton 08 route.

A more dispersed Compton 08 route would mean more people experiencing some aircraft noise rather than fewer people suffering a much higher level of noise. We think this is a fairer solution. It would mean that Harpenden would not benefit as much as it would under the new proposals for easterly departures to the south west. However, Harpenden stands to benefit greatly from the proposed changes to Luton westerly departures to the east and south east. Harpenden would therefore still enjoy a significant net beneficial effect.

Wheathampstead, like other areas across a broad swathe of south west Hertfordshire, also suffers from a significant number of northbound flights out of Heathrow. These aircraft tend to be heavier and older than those using Luton and Stansted airports, and drone across the sky at heights apparently both considerably higher and lower than the 6000 feet they are supposed to be flying at. This brings us back to the question of the effect of the Bovingdon hold on departures from Heathrow to the north.

Return to the website:

<http://www.wheathampsteadpreservation.org.uk/id6.html>