

Public
Key Decision - No

HUNTINGDONSHIRE DISTRICT COUNCIL

Title/Subject Matter: Consultation by National Air Traffic Service-
Luton Airport flight path changes

Meeting/Date: Cabinet – 21st January 2021

Executive Portfolio: Executive Councillor for Leisure and Regulatory
Services – Councillor K Prentice

Report by: Operational Manager (People) – Finlay Flett

Ward(s) affected: All

Executive Summary:

This paper outlines the content of an ongoing consultation exercise being undertaken by the National Air Traffic Service (NATS) regarding changes to Luton Airport's approach flight paths and associated holding zone and offers the opportunity for Cabinet to consider and comment on it.

Recommendation(s):

Cabinet is recommended:-

1. To consider the report and determine whether a formal response from the Council to the NATS consultation exercise is appropriate; and
2. If considered appropriate, to delegate authority to the Chief Operating Officer, in consultation with the Executive Councillor for Leisure and Regulatory Services, to make a formal response to the consultation on behalf of the Council.

1. PURPOSE OF THE REPORT

- 1.1 This paper outlines the current consultation exercise which the National Air Traffic Service (NATS) are carrying out in respect of proposed changes to the incoming flightpaths to Luton Airport and the associated holding zone.

2. BACKGROUND

- 2.1 In October 2020, NATS launched a consultation exercise which is scheduled to run until early February 2021. This exercise consults on proposals to alter inbound flight paths and to create a new dedicated holding zone for Luton air traffic.
- 2.2 These changes are planned in order to provide clear separation of the air traffic for Luton and Stansted airports, which currently overlap. The changes also create a dedicated holding zone for Luton's air traffic, replacing the current holding zones, which Luton traffic shares with Stansted traffic.
- 2.3 NATS have published a detailed consultation paper on these proposals, which can be found at https://consultations.airspacechange.co.uk/london-luton-airport/ad6_luton_arrivals/user_uploads/lla-arrivals-consultation-document-screenview-1-3.0.pdf. In addition, an abridged version of the consultation document has been prepared which includes all the key elements but abridges the technical detail, which can be found at https://consultations.airspacechange.co.uk/london-luton-airport/ad6_luton_arrivals/supporting_documents/LLA%20Arrivals%20ABRIDGED%20Consultaton%20Document%20Issue%201.0.pdf. NATS have also created an exhibition-style web site which gives detail on the proposals and also offers the opportunity to register for webinars where the public can hear more about the proposals and ask questions of NATS staff. The exhibition website is located at https://consultations.airspacechange.co.uk/london-luton-airport/ad6_luton_arrivals/.
- 2.4 The main proposals relate to a re-routing of inbound flights as a result of the separation of the Luton and Stansted traffic and the associated creation of new dedicated airspace. The new airspace is to the south of Huntingdonshire, with aircraft starting their final descent to the south of St Neots. As such, this element of the proposals does not have a significant local impact. However, the proposals envisage the creation of a new holding pattern, to be used in the event of unscheduled congestion resulting in a "back-up" of approaching air traffic. This proposed holding zone would be in a loop pattern around the line of the A1 road, broadly from St Neots to Alconbury. A map showing a summary of these proposals, extracted from the NATS documents, is attached as Appendix 1 to this report.
- 2.5 Details of the proposals and the associated consultation have been provided to all the Town and Parish Councils in the District, so individual representations can be made. A number have indicated that they plan to

do so and some have provided comments or copied their consultation responses to HDC. The comments fall into three main areas, namely whether the proposed changes are justified by predicted air traffic levels, the potential for noise nuisance from the proposed holding zone and the potential for increased pollution from aircraft using the new holding zone.

- 2.6 NATS have stated that the primary objective of the proposals is to separate the traffic for Luton and Stansted. This has necessitated the creation of new holding zones, as the current holding zones overlap traffic from the two airports and are also overflowed by the inbound flight paths. The consultation document states that, although the current arrangement is safe, it provides no scope for any additional flight capacity and the combination of this factor plus the desire to increase safety by separating air traffic and preventing flight overlapping means that change is necessary and the “do nothing” option is not considered sustainable.
- 2.7 The rationale for selecting the proposed location of the holding zone is not included in the current information, being a consistent feature of all inbound traffic options. However, this issue was covered by the NATS team at a consultation webinar attended by HDC Officers and Members. It was stated that this location was the only available air space which did not conflict with air space allocated to existing north-south flight paths, east-west flight paths, the descent routes to the airport and the airspace to the north which is used by the RAF bases in the region.
- 2.8 The noise issue is determined by a combination of the number of flights and the noise generated by individual aircraft. Data on these issues is included in the NATS consultation document. This indicated that peak hourly traffic averages at 12-13 arrivals per hour, with peak hours being 0700-0800, 12.00-14.00 and 17.00-19.00. The busiest single hour of 2019 saw 24 arrivals. This would appear to support the assertion that, with traffic flowing normally, use of the holding zone would not be expected to be high. The minimum flying height in the holding zone will be 8,000 feet and aircraft would be held at different heights at 1,000 foot increments above this, to a maximum of 14,000 feet, if additional holding were to be required. Data from the Civil Aviation Authority indicates that the most commonly used aircraft at Luton would generate approx. 55dB noise at 7,000-8,000 feet and noise from aircraft at altitudes any higher than this would not be discernible from background noise. To contextualise this, 50dB is noted as the equivalent of a “quiet office” and 60dB a “busy general office”.
- 2.9 The NATS consultation document quotes guidance which states “Where practicable, it is desirable that airspace routes below 7,000ft should seek to avoid flying over Areas of Outstanding Natural Beauty (AONB); All changes below 7,000ft should take into account local circumstances in the development of the airspace design; Consultation with environmental stakeholders will usually only be necessary where the proposed changes concern controlled airspace below an altitude of 7,000 feet Changes at or above 7,000 feet will usually not have a noticeable impact”.

- 2.10 NATS accept that the actual impact of the proposed holding zone will only be measurable once it is in operation. However, they have also stated that, in simulations, the improved traffic flow generated by the new flight paths and the separation of the traffic from Stansted led to minimal use of the holding area.
- 2.11 Potential pollution is discussed in the consultation but the combination of altitude, more modern aircraft and the fact that no additional capacity is discussed at this point leads to an indication that this is not considered to be a significant concern with these plans.
- 2.12 Comments have been forwarded to the Council by several Town and Parish Councils, as well as by several private individuals. It is understood that most of these comments have been made directly to NATS. The majority have raised objections.
- 2.13 The NATS consultation exercise for views via a survey with 10 specific questions. Questions 1-7 are specifically about the decent/approach flightpaths. Questions 8 and 9 are technical questions regarding airspace classification. Question 10 allows comments on any other issues to be put forward.
- 2.14 As most of the questions relate to the descending flightpaths to the Luton runway, issues which potentially impact on Huntingdonshire residents are not directly covered. However, there is the opportunity to provide “free text” input in Question 10, should it be considered appropriate for the Council to comment. As noted, the main potential areas for comment would be the overall need for change, the positioning of the holding zone and the potential impact of aircraft noise and pollution from the use of the holding zone.

3. COMMENTS FROM OVERVIEW AND SCRUTINY PANEL

- 3.1 The Overview and Scrutiny Panel (Customers and Partnerships) considered this issue, aided by a presentation from the NATS consultation team, at its meeting on 7th January 2021. The Panel made the following comments for consideration by Cabinet:-
- 1) The Panel wants to place on record its dissatisfaction that data has not been provided to demonstrate the impact of the holding area in alternative location options against the published criteria. It is assumed that for the methodology to be sound, alternatives will have been appraised, including the “do nothing” option. The data for these should be published and consulted on. For these reasons, the Panel recommend that the proposals be not implemented.
 - 2) The Panel expressed disappointment that there had not been more transparency around the need for the proposals, with little consideration of alternative options, for positioning of the proposed holding zone and asked that NATS supply more information on this.

- 3) The Panel expressed disappointment on the presented data on noise levels associated with aircraft flying at different altitudes, particularly in relation to rural areas with relatively low background noise levels.
- 4) The Panel raised the issue of potential additional pollution and were informed that the impact on local air quality would not be impacted by aircraft at the proposed altitudes.
- 5) The Panel asked whether, if the holding zone remains positioned as proposed, that the Cabinet can state in the consultation response whether it would be possible to raise the minimum flying height within the holding zone to 9000ft to reduce the potential for noise from planes within the holding zone to cause nuisance at ground level. The reasoning for this is the documentation states that noise from a plane at 8000ft would be approximately 55db and the ambient background noise within parts of the countryside would be 29db, therefore meaning the noise from the plane could be intrusive upon residents living in rural areas of the District.
- 6) The Panel understands that the Civil Aviation Authority has stated a consultation of this nature should last a minimum of 12 weeks and that this particular consultation is 15 weeks long. However due to the importance of the change, the complexity of the documentation and the fact that the people being consulted with will probably not have the expertise to comprehend the documentation quickly, 15 weeks for a consultation of this nature seems quite rushed. Members asked Cabinet to emphasise in their response that more time is required to understand the implications of what is proposed.
- 7) Members would like Cabinet to ask NATS for greater transparency on how often the holding zone would be used, particularly at night, as different statements were given by NATS representatives at the meeting on the frequency of use. In addition, NATS stated that they are expecting flight numbers to increase following the pandemic, but did not give a forecast to how this would affect the number of planes using the holding zone.
- 8) Members questioned how independent the conclusions and findings are, particularly the more technical points and whether they could be trusted. The Panel would like Cabinet to ask whether independent findings and conclusions could be provided, particularly on why the holding zone is required to be located where proposed.
- 9) It was clear to the Panel that the military was not fully consulted on the proposals and Members would like Cabinet to ask NATS if they could consult with the military on whether they require all of the air space allocated to them and if the holding zone could not be located over a more rural area of the county but within current military airspace.

4. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND/OR CORPORATE OBJECTIVES

- 4.1 The Council has a corporate objective to “make Huntingdonshire a better place to live, to improve health and well-being and support people to be the best they can be”. The issues raised in this consultation have the potential to impact on this.

5. LEGAL IMPLICATIONS

- 5.1 This report is for information and comment, so has no immediate legal implications.

6. RESOURCE IMPLICATIONS

- 6.1 This report has no immediate resource implications .

7. LIST OF APPENDICES INCLUDED

1. Map of affected areas.
2. Consultation questions.

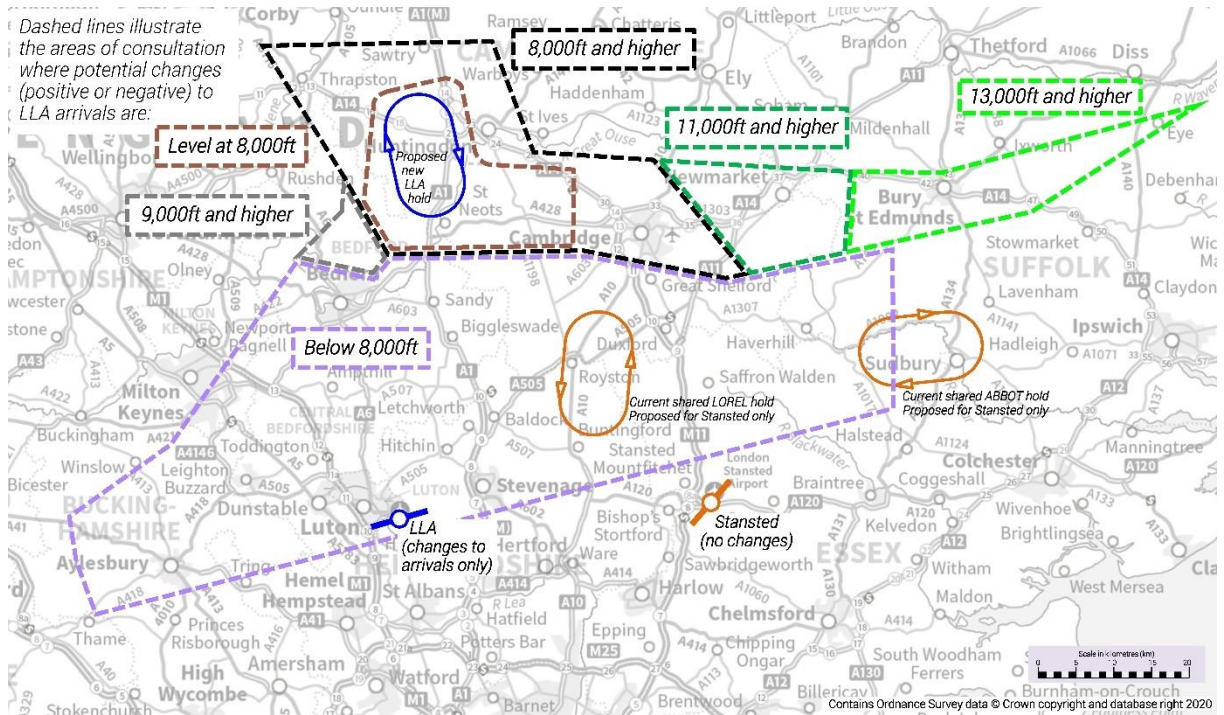
8. BACKGROUND PAPERS

Consultation responses copied to the Council by interested parties, including the Town and Parish Councils.

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Luton Airport Consultation- map of affected areas



Map extracted from NATS consultation documentation

Luton Airport Consultation- specific consultation questions

1. To what extent do you agree that Option 1 is an acceptable solution for Runway 07 (easterly)?
2. To what extent to you agree that Option 1 is an acceptable solution for Runway 25 (westerly)?
3. To what extent do you agree that Option 2 is an acceptable solution for Runway 07 (easterly)?
4. To what extent do you agree that Option 2 is an acceptable solution for Runway 25 (westerly)?
5. Do you prefer Option 1 or Option 2?
6. If Option 2 is progressed, how frequently would you like to alternate between the routes, from the hold to the runway in use, to provide a degree of respite?
7. If Option 2 is progressed, at what time of day would you like to change between the two routes from the hold to the runway in use?
8. Technical Question (no requirement to respond). What classification of airspace would you like the high level additional controlled airspace to the north of Luton to be?
9. Technical Question (no requirement to respond). To what extent would your flight operations be impacted by the proposed Class D airspace, which is required to contain the RNAV1 Transition to Runway 07 north of Leighton Buzzard (PBN Route 2)?
10. If you have any other comments you would like to make, please provide them here:

The NATS detailed consultation paper can be found at https://consultations.airspacechange.co.uk/london-luton-airport/ad6_luton_arrivals/user_uploads/lla-arrivals-consultation-document-screenview-1-3.0.pdf.

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