



FELSTED

PARISH COUNCIL

Rt Hon Patrick McCloughlin MP
Secretary of State for Transport
House of Commons
London
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Mrs D M B SMITH
Clerk to the Council

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Dear Mr McLoughlin

RE: Increased aircraft noise over the Parish of Felsted resulting from changes in Stansted Airport flightpath usage.

I am writing to you at the request of the residents of Felsted Parish, and on behalf of Felsted Parish Council, Essex.

In February 2016, under LAMP Phase 1A, changes were made to flightpath usage out of Stansted Airport, which resulted in a doubling of flights using the Clacton SID from runways 4 and 22, and a dramatic and unacceptable increase in noise nuisance to the people of Felsted Parish and its surrounding areas.

A consultation was undertaken by NATS prior to this change. Over 80% of responses (including all Parish and District Councils and Sir Alan Haselhurst MP) presented arguments for not making the changes at this time, changes which the original NATS documentation admitted would result in a 63% increase in those intensively overflowed.

We have a number of grievances regarding both the decision making process and the subsequent impact of the decision:

- Only one option was presented by NATS, so it was not possible to evaluate the relative merits of any alternatives. In the final CAA ruling there was reference made to a number of viable alternatives, none of which were offered for public consultation. This is wrong, especially since the 'do nothing' option appears to have been discounted solely for air traffic control employee workload reasons. There appears to have also been an option to move the Clacton NPR. Again this was not made public. The current NPR routings were set nearly 30 years ago, since when a number of large new residential communities have been built which are now impacted by these flightpath changes. It is wrong that this option was not offered for public consultation.
- Within days of the announcement of the CAA's decision to proceed with the Stansted changes, an independent report criticised the CAP725 change process as not fit for purpose. This has since resulted in a complete review of CAP725 being instigated by the CAA with proposals to adopt the proposed improvements. It must therefore call into question the legitimacy of the whole decision process to alter Stansted flightpath usage.
- NATS' summary of people's responses to the original consultation process dismissed them

as 'raising nothing new'. Concerns raised were devalued by NATS referring to them as having come from 'pressure groups', rather than the Local Councils. These were not NIMBY responses. They included calls from Councils to 'maintain fairness' in the reasonable distribution of noise disturbance, rather than concentrate it over a reduced number, and calls to consider impact of aircraft noise levels against low ambient noise in rural environments.

- The CAA refused requests from groups and individuals to make public the NATS change proposal, on the grounds that it was not in the public interest. This leaves communities clear in their minds that this is a closed shop approach to change, with no genuine interest in, or consideration towards, community interest or opinion.
- There was no attempt by NATS to consider measures to mitigate the impact from the proposed changes. Many options exist and were put forward in the consultation phase, but were simply dismissed.
- The NATS response to the consultation changed the calculation method for the number of people adversely affected. A weighting factor (not used in the original consultation document) was introduced to argue that those adversely impacted would only be affected for 30% of the time. This was not true since flights from both runways 22 and 4 impact the Parish of Felsted, with people on the eastern side affected by both where they intersect: **effectively going from being partly overflowed on a few days of the month, to being overflowed all day every day (and, increasingly at night too). This should be considered an unexpected outcome in any review.**
- The principle currently being employed with the new Performance Based Navigation (PBN) system is to focus departure noise onto fewer people, rather than to use it more intelligently. Whilst this is allowing Stansted to get narcissistic self-publicising awards for reducing the headline numbers of those affected by directly overhead noise, the reality is that the total noise is unchanged. **Rather than using PBN for a greater good, by fairly and more accurately distributing flights across the NPR, it is being used to focus noise down onto an ever more unfortunate group**, many of whom bought homes in areas with long established flightpaths that were not excessively overflowed.
- The Stansted noise complaint Freephone number has been switched off since the end of 2015. This makes it much more difficult for those without internet access (and Felsted has many elderly residents not online), to make complaints. It goes without saying that this will result in residents giving up on their complaint upon hearing the 'send an email' message. As a result it must be assumed that **the official complaint level is a hugely understated number.**

We understand that there will be a review of the changes to Stansted flightpath use in February 2017. We have therefore written to the CAA to ensure they have it on record for this review that the impact of the change on the Parish of Felsted has been significant and unacceptable.

Given the way in which all of the consultation submissions were dismissed, we fully expect a similar disinterest and dismissal of continued concerns, but feel that we must try to make our voices heard. **This is why we are writing to you.**

Whilst the 'headline' impact of the change might appear manageable, being a doubling of flights on the Clacton SID, **the reality is that the increased flight numbers are concentrated into the times of maximum impact**, specifically early morning and late evening.

Prior to the change in flightpath usage, just a few flights were heard over the Parish before 7am. Subsequent to the change, this has become a constant flow of flights, every 2-3 minutes, from shortly after 6am. This impact was not made clear in the NATS consultation, nor was it recognised in the CAA's decision making document. **We believe it to be a vital omission and should be considered as an 'unconsidered impact' within the February 2017 review.**

It has become clear that the stated gains for Stansted Airport are not the prime reasons for the changes, when compared to the underlying drivers from other airports, particularly Heathrow.

There are ways in which the increase in noise disruption can be mitigated, whether the change is reversed or not. Rather than using PBN to plague the few with intensive overflying, it can be used to introduce **respite use of the NPR**, as is being promoted at other airports. PBN could also be used to more **closely follow major roads within existing NPRs**. For example, the A120 on the Clacton runway 4 departure, where disturbance can be better masked by existing background noise, and harsh, noisy, fuel inefficient banking reduced, as planes can be better aligned to their destination routing once they reach 4000ft, rather than being restricted to the centre of the NPR.

However, we remain of the view that consideration of the nuisance created should see a **reversal of the change**, once again sharing daytime air traffic across the Clacton and Detling\Dover SIDs, and once more utilising the full 3km width of the NPR, so that noise nuisance is more reasonably and fairly distributed.

Felsted Parish Council is asking for your involvement and intervention, so that our voice, as the **elected representative of 3000 parishoners**, is more fairly heard, and the **February 2016 change is reversed as soon as possible**.

Yours sincerely

Diane Smith
Clerk to Felsted Parish Council

Copy to : Sir Alan Haselhurst MP
Andrew Cowan - Managing Director Stansted Airport Limited
Martin Rolfe - Chief Executive Officer NATS
Stewart Ashurst - Chairman STACC
Martin Peachey - SSE