

## **London Luton Airport – Proposed Changes to Airspace Response by Cambridgeshire County Council**

### 1. Consultation with affected elected representatives

Notwithstanding the consultation arrangements that have been made, the County Council is disappointed that NATS and their consultants have been unwilling to go beyond the minimum arrangements and pro-actively engage with local representatives to explain their proposals and listen to local concerns. The County Council notes they received no formal invitation to participate in the consultation and it was only through local councillors drawing officers' attention to it that a formal response has been drafted.

As mentioned in our letter, there is significant regret that the County Council was not invited to the stakeholder engagement sessions in 2019 as part of the 2A Options Appraisal process. When asked about this at a meeting, officers were advised that the impact on Cambridgeshire is not as significant as authorities closer to Luton Airport. While this is not disputed, the proposals have attracted considerable media attention in and interest from local councils at all tiers. Given that the heart of the proposal involves a stack above one of the fastest-growing towns in Cambridgeshire, it is disappointing that more proactive messages to engage with communities were not made at a time where those communities were keenest to engage.

While the challenge of conducting a large consultation during a pandemic is noted, there is a feeling that the consultation materials were inaccessible for certain key stakeholders. It is also disappointing that the consultation was held over the Christmas break, which has reduced the window in which a formal response can be prepared. While the online Virtual Consultation was very impressive, it would have suited many local groups to engage with a written report, either due to technology issues, or out of simple preference. Officers have felt that the consultation report itself was considerably technical. The quantified impact of the proposals over Cambridgeshire was not clearly presented in the reports and needed additional commentary.

### 2. Aviation Efficiency.

The County Council accepts that there are limitations on the overall locations of the holds and supports the broad aims of NATS to minimise fuel use, emissions and environmental impact. It is noted, however, that there is a balance to be struck between, on the one hand, use of the holds, which involves more fuel consumption but may impact on fewer people and, on the other, more direct approaches, which uses less fuel but may affect more people. The County Council also understands that the new holding patterns will increase the capacity at both Luton Airport and Stansted Airport and so questions the efficacy of the absolute reductions in CO2 emissions implied.

### 3. Forecast Growth Rates of Air Traffic.

As mentioned above, the County Council is concerned that the consultation documents do not factor in the expansion of Luton Airport if the DCO is approved. There is therefore a strong belief that should the DCO be approved that the consultation needs to be redone to factor in updated forecast growth rates.

### 4. Noise Predictions

Although it is suggested that these proposals will not lead to significantly higher levels of noise in Cambridgeshire, it is worth mentioning that we believe the noise measurements do not take account of existing noise impact from light aviation already experienced by residents, particularly beneath the proposed Huntingdon stack. There may, therefore, be an impact on the tranquillity of rural areas within Cambridgeshire beneath which the holds are to be situated. As with the comments below on the individual holds, the County Council urges NATS to do all it can to minimise their use and disturbance to these areas.

### 5. Air Quality

It appears very unlikely that there will be any impact on Air Quality Management Areas in 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).

### 6. Climate Change, Landscape and Biodiversity

Whilst direct impact is unlikely, there is a potential indirect adverse impact on climate change, landscape and biodiversity through emissions from planes circling over Cambridgeshire 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. But, it is illogical for Government to instruct Local Authorities to focus on reducing per capita CO2 emissions in their local authority area (National Indicator 186) when these are dwarfed by additional aircraft emissions brought about by the extra airspace capacity considered in this consultation. A more significant impact may be realised as a result of the expansion of Luton Airport, for which the County Council would expect additional detail on the impact on Cambridgeshire if those proposals are progressed.

### 7. Preferred Options

While noting that the options presented should reduce levels of overflying in Cambridgeshire, particularly at levels below 7,000 feet. for the reasons addressed in Section 1 the Council does not take a view on a preferred option of those presented in the consultation documents, as it fundamentally believes there is space to explore alternative options to the Huntingdon stack and was not invited to engage with or comment on those proposals when they were appraised in 2019.