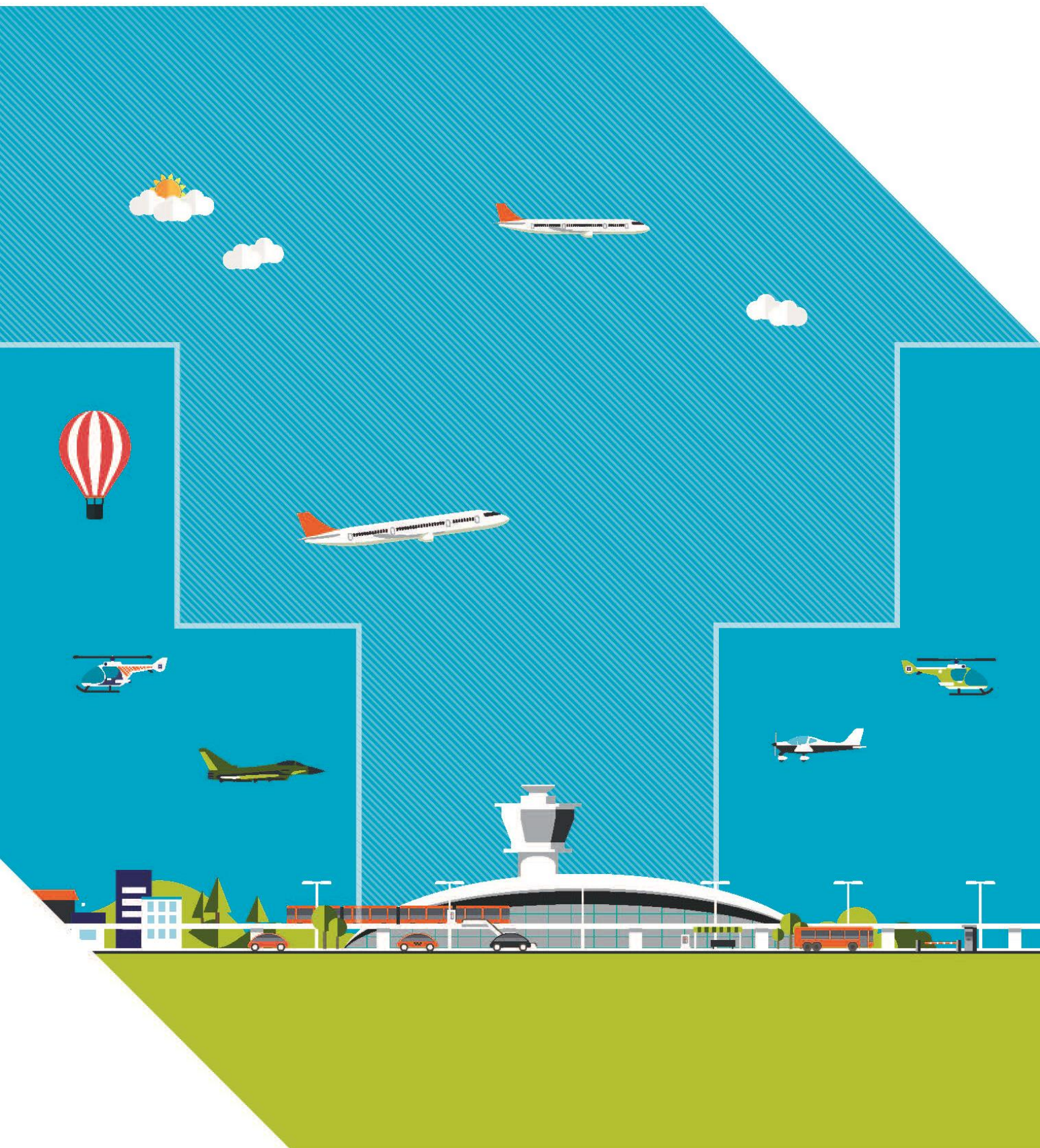


Swanwick Airspace Improvement Programme - Airspace Deployment 6 (ACP2018-65)

Public Evidence Session Transcript - CAP 2263



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Introduction

As part of its CAP1616 airspace change process, the UK Civil Aviation Authority held a public evidence session on the on the Airspace Change Proposal affecting London Luton Airport's arrival routes, *Swanwick Airspace Improvement Programme - Airspace Deployment 6 (ACP-2018-65)*. The details of the session were as follows:

Date: 22 September 2021

Time: 14:00 – 16:00

Location: Online

This document is a full transcript of the statements made by all parties at the public evidence session and has been published on the Civil Aviation Authority's online airspace change online portal. This evidence will be reviewed and demonstrably taken into account by the CAA in its decision document.

Transcript

THE CHAIR

Afternoon, everyone. Thank you all for waiting patiently in the lobby for us. We are now at 2 o'clock, we will begin. As I say, good afternoon and welcome to the UK Civil Aviation Authority's public evidence session on the Swanwick Airspace Improvement Programme, Aerospace Deployment 6, reference number ACP-2018-65, and this forms part of the CAA's CAP1616 airspace change process.

My name is Alex Coleman and, as the Airspace Engagement Manager here at the CAA, I will chairing today's session. We are also joined by a number of people from the CAA, including Jon Round, Head of Airspace, Air Traffic Management and Aerodromes, Seonaid Reed, the Manager of Airspace Regulation as well as other CAA specialists covering a wide range of technical areas. We also have a number of representatives from the change sponsor here as well.

Before we begin, these public evidence sessions are designed to be an opportunity for stakeholders other than the change sponsor to provide us at the CAA as the decision maker with their views on the ACP, Airspace Change Process, directly. We have nine registered speakers for today's session, five of which will be groups or organisations and they get 10 minutes to speak. We also have four individuals, they are given five minutes to speak. In the interests of fairness we will be sticking rigidly to times. So please don't be offended if I have to cut you off early.

Now it is important to stress the purpose of these evidence sessions is for the CAA to listen. This means we will not be responding to any comments by the stakeholders, nor are we here to defend the proposal. We may, however, ask questions, but only if we do not understand what a stakeholder or representative is saying and need to seek further clarification. We may ask clarification have questions too.

It is also important to stress there is no opportunity for opposing parties to challenge the submissions made by any other speakers.

Now this is not a legal proceeding. We have no formal rules of evidence. It is designed to be facilitated evidence giving session at which stakeholders are expected to speak for themselves without any formality or legal representation. I am sure that will be adhered to.

Finally before we begin it is important to know that we are both recording and transcribing this session, both of which will be published on the airspace change portal.

Before I begin I just want to double check that everyone from the CAA is here and ready. It looks like they are. So in that case I will bring forward our first speaker if that's okay, please? Alison Mitchell. I believe I did see your name earlier. If I could just ask you to unmute yourself, Alison. Hello, Alison. I can see you now. If I could ask all other

stakeholders just to turn their videos off just whilst we are dealing with other stakeholders. That would be helpful. Thank you very much. Really appreciate it. Hello, Alison, can you hear me?

MS MITCHELL

Yes, I can.

THE CHAIR

If I could ask you to introduce yourself for our transcriber please and then I will set the clock up ready for you going for five minutes.

MS MITCHELL

My name is Alison Mitchell.

THE CHAIR

Thank you very much, Alison. Your five minutes will start whenever you are ready. I will stop you at the end of it. Again please don't be offended if I do when you make it that far. Good luck.

MS MITCHELL

Thank you. I am here to represent the unheard voices under the airspace designated as CLN CTA10C. We will be adversely affected and have not been given considerations. Our village and those around us comprising a population of well over 10,000 will be constantly encircled by a halo of noise. Aircraft will circle around us to enter the hold or go directly to their descent. The circular routing in this airspace is unique and thus requires particular attention. It will increase the density of aircraft and the intensity of noise within this relatively small area.

An average rate of 9 aircraft per hour is set out in the documents around this will create a constant level of noise peaking at times over 55 decibels. This combination is acknowledged by the government to affect public health and wellbeing. This proposal should be withdrawn and resubmitted only when it can be properly justified, its impact in specific areas honestly described and a public consultation has taken place.

I wrote to my MP, Anthony Brown, with my concerns there was no recognition of noise impact or noise mitigation for our area. We are a rapidly growing population in south Cambridge development plan, yet we simply did not exist. My MP agreed and passed my letter for a response. NATS and Luton Airport jointly responded but failed to address my specific questions. For example, in the response to the potential level of dBA equivalent to 16 hours they replied that there was no existing data for our area. Of course, there was no data for our area. The aircraft had not yet arrived. Surely, they could have extrapolated from existing data. I could, they suggested, look at an annex in Google Earth if I was, and I quote, "curious". I was very curious. It is their responsibility to provide the information, not mine under CAP1616 guidance. I was appalled. "Go find for yourself" was the message. I

realised then that there is a significant failure in the consultation process as befits a judicial review. I am not alone.

Luton District Association for control of airspace noise had highlighted previously that the consultation documents were very complicated for non-aviation specialists and contrary to CAP1616 guidance. This advice was ignored. The public documents failed to address a simple question for people what will be the impact of the change to aircraft noise to people where I live.

Originally failed by the CAA, the consultation was a flawed attempt to contrive to minimise public input. I speak from professional knowledge. I am a researcher experienced in survey design and analysis. Ironically all the publicity claimed by NATS and Luton to lead the public to the survey led them to a survey that was designed to prevent them properly giving their views.

In any consultation validity of conclusions relies on the quality of the survey and inclusive sample design. This consultation failed on both measures. The survey was not designed to elicit real public views but tokenism, presenting narrow focused choices at a very technical level. The tone of the survey was "We are going to do this. We really do not want your views. You have a choice between two bad options". For our area we were not involved in the options. We were deprived of a voice in that survey.

The virtual town hall consultations creatively took place yet failed to put the information clearly and accessibly as required by CAP1616. NATS presented a single group for aircraft in our area, for example. I now know from NATS and Luton airport this is misleading. Right? I attended a webinar to seek some clarity. It was controlled to minimise discussion. The consultation failed to reach people who do not have computers. I take this very seriously. They have the right to comment. The consultation has discriminated against them. The consultation should have been delayed to ensure equality of opportunity and I believe that this consultation could be challenged on those grounds. The consultation process failed to present clear and accurate information on aircraft noise, contrary to CAP1616. The priority is clearly on the objectives of the industry rather than the right of people to be consulted. This needs to be redressed. Thank you.

THE CHAIR

Thank you very much, Alison. I appreciate that and you still had seconds left. So well done. Thank you very much. I was rapidly scribbling some notes myself on there. Obviously, I am not the decision maker and I know my colleagues will be as well, but I just wanted to flag up a couple of issues that I picked up. A number of themes I suppose that I picked up.

MS MITCHELL

Yes.

THE CHAIR

The first one obviously you and your community don't feel that you have had adequate representation up until this point.

MS MITCHELL

Correct.

THE CHAIR

You have serious concerns about the quality of the consultation.

MS MITCHELL

Yes.

THE CHAIR

(a) it wasn't providing adequate information for people to make informed decisions. You also felt that it was designed to minimise public input rather than to encourage it.

MS MITCHELL

Yes

THE CHAIR

And effectively you had a choice between two bad options.

You also were concerned about people who didn't have computers at home, were not able to participate. Those are sort of the key things I picked up on there in my rapid thing. I am just going to open it up to my CAA colleagues to make sure there are no clarification questions. As I said, we can ask clarification questions.

MS MITCHELL

Sure.

THE CHAIR

But it looks like that was all received and very well understood. So, thank you very much, Alison. Thank you very much for being our first speaker today and in fact our first speaker in any public evidence session. There is a bit of a record with that.

MS MITCHELL

Oh, I see. Thank you for listening.

THE CHAIR

You are of course welcome to stay on the line and listen to the rest of the contributors. I am going to mute you now as well. If I can ask you to turn your video off as well. Thank you very much.

MS MITCHELL

Thank you. Goodbye.

THE CHAIR

We are running a little bit ahead of schedule because Alison was so succinct and we didn't have any questions. Can I check if our next speaker is on line just to keep us going? Mark Williams?

MR WILLIAMS

Yes, I am here.

THE CHAIR

Thank you for unmuting and turning your camera on. That's very helpful. The same will apply for you except as you are representing a community, you get ten minutes to speak. What I am going to do is just open -- just ask you to introduce yourself properly for me and who you represent for our stenographer, please.

MR WILLIAMS

My name is Mark Williams. I am the Chair of a group with about 400 members called Community Alternatives to Luton Flight Path. I am also a Potton town councillor and speak with the authority of my fellow councillors.

THE CHAIR

Thank you very, very much, Mark. I am just going to double check. It looks like my CAA colleagues are ready as well. In that case, and my clock is ready. As I say, you get ten minutes today, Mark. Whenever you are ready, I will start my clock when you begin.

MR WILLIAMS

Thank you.

I and my group are not opposed flying. We are opposed to bad planning and this is bad planning. We are concerned this consultation is not being conducted in good faith with a pre-determined conclusion being pushed through in disregard of planning procedure including the Gunning Principles.

The application says the change to airspace is used for safety reasons. It is clear to all of us the subtext is to provide more Capacity at Luton airport, which like most of the UK's regional airports wants to expand in order grow revenues and profits for its shareholder. This is not about safety. It is about business. Let's be clear.

The consultation documents say the new stack is needed for safety reasons because of increase numbers of flights. In fact, this is reverse causation. Increased numbers of flights will happen above a certain level when or if capacity at Luton airport is expanded due to a

breach of previous agreements and/or the construction of a second terminal. If capacity is allowed to expand, the safest thing to do is to stagger arrivals using the latest air traffic control technology so that stacking of flights is unnecessary. New techniques for ATC include linear hold point merge and linear hold trombone, both promoted by NATS since at least 2016. They would largely eliminate the need for this stack and the proposed descent paths. The preferred solution in the consultation, namely the stack and narrow final approach path is based on obsolete thinking and practice. The planners should be encouraged to think again based on the technology and best practice available to them.

It is bad economics. The airport wants to expand as it is forecasting increased demand which, of course, won't come unless the airport expands, but in any event will increased demand come? Aviation demand has been slower to recover from the pandemic than anyone expected in the industry. Can the airports' demand forecast be relied upon? We think not.

UK passenger forecasts have long been found to be based on simple trend projections which stretch the imagination.

There are several good economic reasons to believe the numbers will not grow as fast in the future, eliminating or postponing the economic and therefore the technical and safety reasons given for justifying the expansion.

For instance, until COVID-19 vaccinations and immunity are achieved globally, regular lockdowns and transport disruptions are a near certainty, affecting not just Luton and its catchment area but all of its destination airports.

After Brexit it is estimated that up to 200,000 EU workers have permanently left the UK just in the last year, reducing demand for the kind of short haul flights operated from Luton.

Consumers are becoming more environmentally conscious, they are increasingly aware of the contribution aviation makes to GHG, greenhouse gas emissions. The future of low cost aviation could be affected by this.

Governments are increasingly reacting to aviation's emissions. For instance, aircraft being included in the EU's emissions trading scheme, or France's regulation of putting internal flight passengers onto trains. Expansion of carbon taxation schemes and airport aviation fuel still isn't taxed, could affect the low price airline business model and tourism costs could increase to levels at which passenger figures decline.

We are at the inflection point of this policy change, making forecasts of passenger numbers based on historical numbers less reliable.

A recent Bloomberg survey of 45 large businesses in the US, Europe and Asia shows that 84% plan to spend less on post pandemic travel. The majority of respondents say they are cutting travel budgets of up to 40% with about in slashing both external and internal in-person meetings.

This will severely affect the operation of business models of most international carriers, who rely on business travellers' high ticket prices to subsidise low cost tourism.

So the economics don't stack up and should be reassessed before any changes are allowed.

It is bad policy.

The all Parliamentary Transport Select Committee has been meeting over the last year discussing transport demand in the UK. The Chairman, Huw Merriman, Conservative, Bexhill and Battle, has been on record saying, "Changes to the way we appraise capital spending projects means the Government no longer has to use value for money as the sole indicator. With so much uncertainty pressing the accelerator too early could lead to vast transport infrastructure projects which are either not needed or sited in the wrong parts of the country to level up".

The government's Climate Change Committee has said "Any expansion of airport Capacity in the south-east must be met by a reduction elsewhere in the country", sparking a rush as 31 regional airports have now applied for expansions.

The Luton airport expansion plan represents an uncoordinated approach in clear breach of the government's aviation 2050 strategy which enshrines "A partnership for sustainable growth which meets rising passenger demand balanced with action to reduce environmental and community impacts, not increase them".

Luton has already breached its Capacity, expanding far faster than it properly ought to have done, reaching 19 million passengers, at least eight years ahead of when they said they would.

WHO guidelines on aircraft noise suggest that guidelines in day time should be below 45 decibels Lden and below 40 decibels at night as aircraft above those levels is associated with adverse health effects.

Luton Airport is already in breach of its noise limits, the night noise contour planning condition has been repeatedly breached since 2017. Luton Council has failed to take any enforcement action, being conflicted in its role as a shareholder in the airport.

Hertfordshire County Council said in July 2019: "The airport has betrayed other partners, particularly those communities currently suffering from adverse consequences of the breaches of planning control. The County Council is of the view that the actions of the airport have fallen considerably short of government expectations."

Residents in the area have been told only to expect "a significant impact from noise". The CAA's own guideline videos on YouTube show that aircraft similar to the A220 and B737 airliners commonly used by the likes of easyJet, Ryanair or Whizz at Luton would be noisier than WHO Europe's guidelines when over flying communities on the descent path. The CAA has published requirements and guidance on assessing noise impact for the

purpose of proposing a change to the design of air space. We think the Luton Airport proposal does not clearly follow these.

Staging this consultation during a pandemic has meant it has gone largely unnoticed by exactly the communities it affects. Nearly half a million people now and many more who will be under its flight-path within five years as the OxCam Arc increases population density under flight path from around 350 to over 1,000 people per square kilometre. This breaches the third Gunning Principle that adequate time is given for consideration and response.

The consultation as composed during the on-line period was not clear to the vast majority of those who viewed it, particularly in regard to noise, as the previous speaker has mentioned.

Individuals were afraid of contracting COVID-19 from their parcels so we couldn't even go out leaflet-ing people in the area to let them know this was happening. Nobody was written to. Even Potton Town Council was only written to once it approached the airport to find out what was going on.

Central Beds voted against this on 12th November, representing all 380,000, people in the County Council. "This council strongly opposes the current flight-path proposals put forward by Luton Airport and NATS which affect most residents within Central Beds. It is completely inappropriate that those in the most affected areas are presented only with options resulting in large numbers of flights directly overhead. Furthermore, in light of this lack of options and the significant changes wrought on international travel by Covid, this council believes the only appropriate cause of action would be for Luton Airport to recommence the whole process considering all options and this time include affected residents and local authorities right from the start."

This consultation is not offered a real choice to those it would affect the most. The preferred options are for only limited respite, in the airport's own terms, to those being overflown. Disregard for residents was proven on ITN News on 24th June this year when a spokesperson for the airport said "The consultation was not a referendum and that airspace design proposals cannot be based purely on popularity." This shows it is not listening to the real concerns of the community and is pressing on regardless of the fourth Gunning principle, namely that the product of consultation is conscientiously taken into account when finalising the decision.

We think the change is not required. The consultation was badly run and it was badly timed. We would like to see it run again with full recognition of technical, economic and policy alternatives.

Thank you.

THE CHAIR

Thank you very much, Mark. Well within time. Thank you very much. Again I was rapidly scribbling down some notes throughout that. You were quite firm that you have are not against flying in general but you felt this is bad planning and the consultation did not adhere to the Gunning Principles. You are of the view that the preferred solution uses obsolete thinking and they should instead be using new technology to stagger arrivals and not use the stacks. You also felt the proposal was bad economics with aviation not recovering as fast as expected following the pandemic, the impact of Brexit as well as the unknown impact on any future green measures and the effect on growth that would have as well as less business flying. You also felt it was bad policy and again moving forward to the consultation you felt there was not enough time for people to consider it and respond due to the pandemic and also that the consultation did not listen to the feedback within it. Was that generally the theme? Have I caught generally the themes in there for you, Mark?

MR WILLIAMS

That's it. Thank you.

THE CHAIR

Thank you very, very much. Again here I will just have a quick look at my colleagues to see if they have any clarification questions. I am getting a lot of shaken heads. So that's perfect. In that case, Mark, thank you very much for your time this afternoon. I really appreciate it. I hope you found the opportunity to address us helpful and I will ask to mute and de-camera yourself, please. Thank you.

MR WILLIAMS

Grateful. Thank you.

THE CHAIR

Thank you very much, Mark. Take care. Again we are running slightly ahead of schedule now. Do we have Peter Balicki on the line? We do. Perfect.

MR BALICKI

Hello, yes. I will take my glasses off.

THE CHAIR

As I say, we are running ahead of schedule. I hope you don't mind us bringing you in earlier rather than us sit here for nine minutes in silence. We may as well keep on rolling while we have people here.

MR BALICKI

Yes.

THE CHAIR

Again you are representing an organisation. If I could just ask to you introduce yourselves for our stenographer, please, again with the organisation you are representing please.

MR BALICKI

Fine. I am Peter Balicki. I am Chairman of Hilton Parish Council.

THE CHAIR

Thank you very much, Peter. In that case you get ten minutes as well, as you are speaking as an organisation. I will start the clock when you begin. Thank you.

MR BALICKI

Okay. I probably won't take ten minutes.

So the village of Hilton and the parish of Hilton object to this proposal to put a stack over basically Huntingdon. The actual draft of the consultation we objected to because it gave no option to say you didn't approve of it. It just gave options to say which one you prefer, A or B. No option for having a voice against. The area affected by this flight path has just seen the opening of the new southern bypass A14, six lanes of dual-carriageway adding to the -- not dual-carriageway -- obviously it is six lanes -- adding to the dual-carriageway of lanes over the old A14. So noise levels have gone up as a result of that. One of the flight paths into the new stack flies along the A14, an area where there is no flight traffic at the moment, or rarely is there flight traffic. This will just add to the levels of noise pollution that affect this area now and our MP pointed that out, Mr Djanogly, when he wrote to the scheme previously. We believe that there is not enough consideration for environmental impact of this on our community and there appears to be no effort to have recorded what noise levels are at the moment so that they could be recorded again if this should go ahead, so that, you know, comparisons can be made. We thought that the other thing that we didn't like was that all the pain was going to those communities that would be affected by this new stacking plan with the flight routes going over Cambridgeshire, Bedfordshire with no benefit to them, the only benefit going to Luton, which obviously rents the airport out and will see costs of potentially increased traffic. That was pointed out by one of the MPs for Bedfordshire. Our MP, Jonathan Djanogly, also mentioned that the consultation appeared to be outside the Airspace Modernisation Strategy and we heard Alison mention earlier about the consideration for linear holds rather than stacking should be prioritised. He concludes by suggesting that this issue be scrapped or deferred for five years, which I assume would mean a re-consultation at that time. Previous speakers spoke about the possibility of a re-consultation in line with the Gunning Principles and that's what we would support as well. That's it.

THE CHAIR

Thank you very, very much.

MR BALICKI

That's okay.

THE CHAIR

Perfect. Okey-dokey. Let me just make sure I have at least the key themes myself. Obviously your parish objects to the stacks over the Huntingdon area. You disapproved of the consultation as it didn't give you an option to say you didn't approve at all, just the choice of choosing one of the options.

MR BALICKI

Uh-huh.

THE CHAIR

Currently there is no air traffic in the area so you feel this would be a disproportionate impact on those, and not enough consideration of the environment impact on the communities below. You also felt that all of the negatives were going to communities that wouldn't see any of the benefit. All the benefits would be going to the people of Luton. You also felt that, as this ACP appears to be outside of the Airspace Modernisation Strategy, you felt that it would be probably better to wait several years and re-consult and start the process again.

MR BALICKI

Yes. Absolutely.

THE CHAIR

Does that sum up?

MR BALICKI

Absolutely.

THE CHAIR

Lovely stuff. Thank you.

MR BALICKI

Thank you.

THE CHAIR

I am just going to check with my colleagues just to make sure there are no clarification questions. We'd hate to let you go. Jon looks happy. Everyone is happy. Lovely stuff.

MR BALICKI

Thank you very much.

THE CHAIR

Thank you very much. Just bear with me. Sorry about that. Again we are well ahead of schedule. That's not a bad thing. I am just going to check if we have Robin on the line at all here. Robin Barratt. Sorry for sounding a bit silly. I can't see all the names on my screen at the moment. We have Robin. How are you?

MR BARRATT

I am fine thanks.

THE CHAIR

Again you are representing an organisation. So if I could ask you to introduce yourself and your organisation for our stenographer, please.

MR BARRATT

Certainly. I am Robin Barratt. I am Chairman of Wrestlingworth and Cockayne Hatley Parish Council and I represent the 800-odd residents of the parish.

THE CHAIR

Thank you very much for that, Robin.

As you are representing an organisation, you get ten minutes. My clock is now ready. Whenever you are ready, I will start the clock. Thank you.

MR BARRATT

Thank you. I don't need ten minutes.

My residents have voiced a number of concerns over the results of the LLA flight-path review and the subsequent consultation process. However, the Parish Council wish to highlight two key points to the CAA.

Point one is with regards to the proposed routes, which predominantly overfly rural communities. This means that the noise pollution will have a far greater impact on the population than it would if the routes followed major ground transport routes and overflow urban areas where there is more ambient background noise. The open countryside and green spaces are acknowledged as being vital to people's physical and mental well being and destroying the tranquillity of the rural environment is in our view very irresponsible.

For my second point I would like to highlight a major deficiency in the consultation process itself. The consultation took place during a pandemic, when the vast majority of people were focused on staying safe and managing the very real risk presented by COVID-19 and therefore had very little appetite to focus on this matter.

The consultation presented two routes for residents to comment on. However, for this community and a number of the neighbouring communities both options resulted in all flights overflying our villages. Therefore, we had no options to choose from. This is grossly

unfair. We should have been consulted on the planned routes at a far earlier stage in the process when options other than the flights over our parish could be considered. In view of this we consider the consultation is flawed and should be discounted.

It is worth noting that Central Beds Council, regional MPs, most town, parish and our councils in the region have all objected to the plans and the form of the consultation.

In view of the above points I implore the CAA to reconsider these plans. Thank you.

THE CHAIR

Thank you very much, Robin. Appreciate that. Again you rather helpfully did the task for me of sticking to themes. The first one was -- I will go the second one that's on the first page. You were concerned about the consultation, the fact that it took place in the pandemic and people were focused on the very real risks of COVID- rather than an airspace change proposal. You also felt that those people in your community should have been consulted at an earlier stage because the two options presented to you both resulted in your community being overflowed.

MR BARRATT

Yes.

THE CHAIR

Just generally you feel the consultation was flawed and should be re-run. You also made the point around you object to the proposals because they fly over a rural community and that would feel the impact of the aviation noise far more than if flew over existing transport routes as well as urban areas, and you feel that the destruction of tranquillity is irresponsible. Was there anything else I missed in that one?

MR BARRATT

No. That's fine. Thank you.

THE CHAIR

Thank you very much. Again, I am just going to just check with my colleagues to see if they have any questions. It doesn't look like they do. Perfect. Thank you very, very much in that case, Robin.

MR BARRATT

Thank you.

THE CHAIR I will just tick you off my list as well. Hello. Our next speaker has just arrived. I was just about to call but he has just arrived. Hello, Mr Ridewood. You are very, very early but we are ahead of schedule. You are actually our next speaker. I was wondering if you would be okay to continue your slot now?

MR RIDWOOD

Right. Can you hear me now?

THE CHAIR

I can, yes.

MR RIDWOOD

I am just connecting my headphones. I am a little bit early.

THE CHAIR

Hello. We are actually running far ahead of schedule. Our speakers have been very succinct so far and very accurate. We have not needed full-time for them. You arrived bang on time and I was just about to see if you were there. As long as you are comfortable to go now. Are you ready?

MR RIDWOOD

I can go now. Absolutely.

THE CHAIR

Perfect. In that case if I could just ask you in a second to introduce yourself for me and you are speaking as an individual. So you get five minutes to speak today. Just for our stenographer if you could just introduce yourself so they have your name.

MR RIDWOOD

I have timed myself. Sometimes it is five minutes and seconds. Because I am a little bit earlier do I get an extra seconds? I am going to talk fast.

THE CHAIR

Let's see how it goes. I am meant to be super strict. Let's see how we get on. If you are seconds away from finishing at five minutes I may let you slip on.

MR RIDWOOD

Thank you very much indeed.

THE CHAIR

As I say, if you could just introduce yourself, please?

MR RIDWOOD

Now?

THE CHAIR

Yes, please.

MR RIDEWOOD

I am Gareth Ridewood and I am a resident of Cambridgeshire living within the proposed hold area.

THE CHAIR

Thank you very much, Gareth. Whenever you are ready I will start our clock. Thank you.

MR RIDEWOOD

Okay.

I strongly argue that the re-orientation of the hold as proposed has not achieved the desired outcomes the applicant has suggested but feel its impacts are now greater. The tranquil area of the Northern Wolds, the highest area of Huntingdonshire, including conservation areas, are now subject to greater noise impact, which -- once more densely populated areas continue to be impacted. The applicant admits St. Neots will be impacted in addition to aircraft arrivals from the west bypass orientated hold. The Huntingdonshire Landscape and Townscape Assessment Supplementary Planning Document described the proposed hold area as one tranquil, quiet and peaceful with strong historical character.

It is my belief the re-orientated hold will have a greater noise impact and residents newly directly impacted have not been subject to consultation about this change, in particular Pertenhall, Tilbrook, Catworth, Leighton Bromswold, Buckworth, the Offards and Little Paxton.

The consultation material appeared to be a fait accompli and there was no ability to comment on the upper hold design. It lacked a clear indication on what difference the proposal would make to aircraft noise where I live. This is a fundamental omission when judged by the CAA's Airspace Change Manual, CAP1616. When I questioned this on the LLA webinar, the cumulative impact of noise in the proposed hold area if various layers are utilised, the NATS specialist said, "The lowest plane is the one that is going to be heard, always the one that would have the noise". I was told, "You can't measure cumulative noise impact in a hold and there is no way of combining the noise impacts".

The consultation documents provided no noise maps or information on noise, including number or frequency within the proposed hold. The ICCAN toolkit was not followed.

I am concerned about the impact on health. The WHO has said that aircraft noise above 45 decibels in the day and 40 decibels at night are associated with the adverse effects on sleep and health.

Although I strongly oppose the need for a hold, if the CAA accepts a hold is needed, I feel further revision must be undertaken on the hold location to move it further north-west-west and slightly alter the orientation to avoid the number of villages and towns being overflowed, reduce the impact on fuel boom from prevailing winds and move it into more open countryside. The consultation documents mapping show this is possible.

I believe the application is premature and potentially conflicts with UK Airspace Modernisation Strategy, which includes the objective to progressively reduce the noise of individual flights through quieter operating procedures. Noise impact should be considered through airport design processes and clearly communicated. As I have shown, the noise impacts of the proposed hold have not been clearly communicated.

I do not believe the applicants have adequately assessed the impact of the proposals on the Natura 2000 site at Portholme meadow, which is under the Habitats Regulations.

In 2010 NATS withdrew the 2008 proposed changes to terminal control of air stack proposal where the stack was moved further south, stating one of the reasons was the downturn in air traffic levels, and there was no urgency to bring in the new proposals while a wider review was taking place of airspace over southern England. The COVID-19 pandemic and uncertainty in the airline industry has caused an estimated reduction in global air travel of 67% and the International Air Transport Association has said that global passenger traffic will not return to pre-COVID levels until at least 2024/25/26.

The FASI-S Airspace Strategy plus Single European Airspace will look at alternatives to stacking, such as linear holds. The UK's net zero carbon target is incorporated into law and the Climate Change Committee has said there is no room in the carbon budget for any expansion in UK aviation Capacity. I believe the proposal should be withdrawn, a pause for the Airspace Change Master Plan Assessment Framework Recommendations of August 2021, and the CAA's acceptance of the master plan into the Airspace Modernisation Strategy makes the master plan together with CAP1616 the legal basis upon which airspace design decisions are made by the CAA. Therefore, the CAA's decision on airspace change proposals will need to ensure there is no misalignment with the master plan.

The LLA NATS proposals should meet the criteria set out in CAP2156A. ACOG's strategic aim is to reduce controlled airspace, reduce noise and CO emissions. NATS Southern UK Airspace Master Plan outlines potential for reduced terminal holding areas. The LLA NATS proposals are, therefore, I believe contrary to NATS own strategy and UK airspace modernisation. Under CAP2156A(b)(3) it says "The master plan may require sponsors to work together to improve current airspace structure, for example, by removing holds." The UK airspace objective is for fuel efficiency, air quality and noise reduction. These proposals are contrary to those objectives, and in conclusion I oppose these proposals and reaffirm the Air Navigation Directions, with state that the CAA must make airspace change decisions in accordance with its statutory strategy in place, Plan for Airspace Modernisation. The CAA's decision whether to allow the airspace change proposals to pass through the CAP1616 gateway is contingent on the proposal not conflicting with the Airspace Modernisation Strategy. These proposals introduce a new outdated holding stack, which I strongly believe is contrary to the airspace modernisation principles, and even Luton Airport in its DCO application agrees likewise.

Thank you.

THE CHAIR

Thank you very, very much, Gareth. You got plenty in there and well within time. So thank you very, very much.

MR RIDWOOD

Thank you. So is this being recorded? Is it?

THE CHAIR

It is -- sorry -- yes. You missed it. So we are both recording it and transcribing it. So it is all being --

MR RIDWOOD

Okay. I talked quite fast.

THE CHAIR

That's all right. You are also joined here by the key decision makers here at the CAA. You have got Jon Round.

MR RIDWOOD

Thank you very much for your time.

THE CHAIR

No, you're very welcome. It's all part of our process. We have got the Head of Airspace, Air Traffic Management and Aerodromes, Jon Round. You are also joined by the Manager of Airspace Regulations, Seonaid Reed, as well, as well as lots of other technical experts from across the CAA to listen to you. Just so you know who I am, I am the Airspace Stakeholder Engagement Manager here at the CAA as well and I am chairing today's session for you.

MR RIDWOOD

Thank you very much.

THE CHAIR

I took a number of notes in there. I am concerned that I may have missed some points in middle there, but I am sure others will have caught them.

MR RIDWOOD

Okay.

THE CHAIR

But I am keen just to reiterate what I heard, if that's okay.

MR RIDEWOOD

Absolutely.

THE CHAIR

Then my colleagues do have the opportunity to ask you a couple of clarification questions, if they have any.

MR RIDEWOOD

Absolutely.

THE CHAIR

Perfect. So basically the key point is you don't feel the ACP achieved its own goals.

MR RIDEWOOD

No.

THE CHAIR

You disagree with the fact that it is going to be placing a hold over in a tranquil area, which will have a greater impact than if it was over more urban areas. You felt that the consultation was --

MR RIDEWOOD Well, it was -- let me just -- am I allowed to interject? It was the -- you know, there was a proposed hold. Now they have come -- there has been a consultation. It has come back to say that it is going to be re-orientated, and within that they are using arguments to say that, "We're moving it away from populated areas". What I am arguing is that it is actually now impacting on areas that weren't involved in the consultation because of that re-orientation. In fact, you could move it slightly north-north-west and it would actually then form completely over open countryside and would not actually overfly any villages or towns.

THE CHAIR

Okey-dokey.

MR RIDEWOOD

I don't know if that clears it up.

THE CHAIR

It does, and please do not worry too much if my notes aren't bang on --

MR RIDEWOOD

Okay.

THE CHAIR -- because, as I say, we have it all written down and recorded. So it will be properly recorded and just not my rough notes in my little notebook. You felt that consultation was inadequate. It was a fait accompli. Not enough information was shared; no noise map, for example. You also felt that the proposal in itself conflicts with the Airspace Modernisation Strategy --

MR RIDWOOD

Yes, definitely.

THE CHAIR

-- and should be -- and any decision made by the CAA needs to go hand-in-hand in consideration with the master plan that was discussed last month.

MR RIDWOOD

Yes.

THE CHAIR

You also -- sorry. The last thing I got was you felt that the holding stack technology is outdated and a more modern thing should be considered.

MR RIDWOOD

That's right.

THE CHAIR

As I say, Mr Ridwood, we have got all the points written down by our stenographer and recorded in case we have missed anything. So do not worry about that.

MR RIDWOOD

Okay.

THE CHAIR

What I am going to do, I am just going to go over to my colleagues. Jon, was there anything from you, any other questions or clarification? It doesn't look like it. Perfect. In that case, Mr Ridwood, thank you for giving up your time.

MR RIDWOOD

That's okay. I mean, the background noise area within the area where I live under the hold is absolutely quiet apart from the tractors that pass by. So that is why it is so difficult for the people living under it and especially during the pandemic to make sure that everybody was consulted, which I don't think they were, but, you know, the fact that --

THE CHAIR

Thank you, Mr Ridewood. I am going to have to be really rude.

MR RIDEWOOD

Sorry. I talk too much. Yes, that's fine.

THE CHAIR

I'm sorry.

MR RIDEWOOD

No, not at all.

THE CHAIR

Thank you so much for coming.

MR RIDEWOOD

Thank you for inviting me.

THE CHAIR

Feel free to stay on and listen to other speakers if you'd like. If I could just ask you to mute yourself and turn off your camera, please, just for ease --

MR RIDEWOOD

I appreciate the chance to have had an opportunity to speak. So thank you very much, everyone.

THE CHAIR

Lovely stuff. Thank you. Enjoy the rest of your day. Thank you very much.

MR RIDEWOOD

Thank you.

THE CHAIR

We are racing through our speakers, which is good. We are now on to Alan James. Mr James, are you there? I can see your name on the list. Mr James, if I could just ask you to --

DR JAMES

Yes, I am here.

THE CHAIR

Hello, Mr James. How are you?

DR JAMES

I am fine. Thank you.

THE CHAIR

Lovely stuff. Thank you very much. Are you okay to go half an hour early? Is that okay?

DR JAMES

Well, yes. That's fine by me. I have lots of work to do, so I can get back to work.

THE CHAIR

Perfect. Lovely stuff. Okay. Mr James --

DR JAMES

One thing I can say, I did take your advice and write a script. So if you want me to e-mail the script to save your stenographer, I can do that.

THE CHAIR

It is very handy to have. So please. I think you have my e-mail, don't you, Mr James?

DR JAMES

I think so. I certainly have an e-mail.

THE CHAIR

If you send it through to that e-mail you have, I think it is mine, we will make sure it is included.

DR JAMES

Okay.

THE CHAIR

You are an organis... -- you are representing an organisation.

DR JAMES

Yes.

THE CHAIR

If I can ask you to introduce yourself and the organisation you are representing.

DR JAMES

Sure.

THE CHAIR

Then -- I will let you do that first, please. Thank you.

DR JAMES

Okay. My name is Dr Alan James. I am the Chairman of CPRE Cambridgeshire and Peterborough, and today I am also representing CPRE Bedfordshire.

THE CHAIR

Thank you very, very much. As representing organisations, you have ten minutes to speak today. So on that note I will start the clock whenever you are ready, Dr James.

DR JAMES

Okay. I am ready.

Members of Parliament across Cambridgeshire and Bedfordshire, Local Authorities and local people have all voiced strong opposition to the proposed changes to London Luton Airport arrivals. CPRE supports this opposition.

Firstly, we believe the consultation that took place during a pandemic did not meet the standards required for the CAP1616 process and the applicants have admitted they did not follow the ICCAN recommendations. We are concerned that large numbers of people are not even aware of the proposals or their impact. There was no consultation about or the ability to respond to the upper airspace change proposals including the holding stack. Question 5 of the questionnaire gave no choice to select 'Object' or 'Neither. It just asked respondents to select a preference from Option 1 or 2. In other words, the changes were presented as a "done deal" with only the choice of location made available for consultation. CPRE is very concerned this could be a breach of the Gunning Principles.

CPRE has received no direct response from the applicant to its detailed submissions and there is no mention of CPRE's response in Annex A of the Step 4A (i) Consultation Response Documentation. We do not believe the applicants have adequately analysed submissions or responded to consultees with due care and responsibility.

Secondly these proposals would have a major impact on large areas of Cambridgeshire and Bedfordshire currently unaffected by significant aviation noise. The proposed changes are in direct conflict with the government's plans for the Ox-Cam Arc, which include large new towns located under the proposed flight paths. Local authority SPDs clearly demonstrate the proposed hold area is one of tranquility, as confirmed by CPRE's national Tranquility Maps. The proposal also falls within the proposed Area of Outstanding Natural Beauty (AONB) in the Great Ouse Valley, the application for which is currently lodged with Natural England.

The consultation documents did not provide clear information to allow communities to adequately understand the effects of the proposals. There are no noise maps for the proposed hold area, the area south of the hold or approaching Gamlingay; no data to show the expected number of flights which will use the hold; and no data to show what the average number of hold passes will be per aircraft. Therefore it is not possible to adequately interpret how communities' experience of noise will change.

The Airspace Change Process should ensure that areas identified as 'Quiet Areas' are preserved as far as possible, and that special places such as AONBs are not affected.

The flight path funnel over Abbotsley and Gamlingay and the countryside communities between will lead to concentrated noise pollution because most flights will enter the flight path to Luton Airport via this point. There will also be a significant noise and overflight impact on Sandy, Potton and Biggleswade.

The EU, the WHO and the UK Government have expended a lot of effort on developing methods for evaluating the economic costs of noise. They concluded that noise is a pervasive issue impacting on health, wellbeing, productivity and the natural environment. Government strategy is to reduce aviation industry impacts; this proposal will increase them.

Thirdly, these proposals are premature. In 2010 National Air Traffic Control (NATS) withdrew the 2008 proposed changes to terminal control North air stack which included a stack further south in Cambridgeshire. One of the reasons for withdrawal was the downturn in air traffic following the financial crash.

The COVID19 pandemic has seen an estimated reduction in global air traffic of 67%. The CEO of Gatwick Airport speaking to the House of Commons Transport Committee yesterday said that he did not envisage an aviation industry recovery until 2025/6. Airlines had reduced fleet sizes and were seeing low load factors. Business flying has also decreased, replaced by internet meetings and video-conferencing.

CPRE believes these proposals should be paused to ensure they are compliant with the Airspace Change Masterplan as recommended in August 2021. CAP2156A outlines how the Masterplan may require sponsors to work together to improve the current airspace structure, for example by removing holds.

The Luton Airport proposals should align with the ongoing Future Airspace Strategy South (FASI-S) review, the government's Airspace Modernisation Strategy and the Single European Airspace plan. It is clear that the CAA's decision whether or not to allow any airspace change proposal to pass through a CAP 1616 gateway is contingent on being compatible with the Airspace Modernisation Strategy.

NATS, in their Southern UK Airspace Masterplan, have outlined the ability to reduce terminal holding areas which will bring environmental and fuel saving benefits. Their concept of operations does not rely on low level vertical holding close to airports but is achieved through continuous descent. The document Aviation 2050 The future of UK

Aviation published by the Department for Transport anticipates reducing flight noise and carbon emissions by limiting use of holding stacks over Southern England. NATS agree that holding stacks are noisy, inflexible and mean aircraft burn more fuel at lower levels and thus emit more CO2 and instead advocate Linear Holding.

Luton Airport is currently in the process of making a DCO application to government for expansion. An environmental report dated 8th Oct 2019 entitled "Future Luton: Making the Best Use of our runway" Section 4, Airspace Modernisation, directly contradicts the current proposals. It indicates that Performance Based Navigation is expected to allow historic airspace protocols such as stacking to be abandoned, in favour of more direct routings on arrival to airports. It mentions that modernisation strategy intends to reduce the need for stacking, thus helping to reduce carbon emissions and noise impact.

The current proposals for a new holding stack therefore directly contradict the applicants' DCO documentation!

In October 2020 the CAA released a policy statement - Guidance for Sponsors currently progressing through CAP 1616 processes: Restarting a 'paused' ACP setting out circumstances where certain CAP1616 stages should be revisited. CPRE strongly believes that proceeding with the current changes is not justified in these circumstances. They are demonstrably more premature than in 2010 when previous proposals were withdrawn.

Fourthly, consideration must be given to the global Climate Change crisis. The UK's Net Zero Carbon target has been incorporated into law. Moreover, the Committee on Climate Change, Parliament's statutory adviser on the implementation of carbon commitments, has stated that there is no room in the next "carbon budget" for any expansion in the UK's net aviation capacity. The committee has said The UK's airport capacity strategy should be reviewed in light of the net-zero target.

The applicant has admitted that these proposals will increase carbon dioxide emissions and an airline consultee has said this proposal will cause negative fuel impacts and carbon dis-benefits. This proposal is also contrary to the Airspace Change Organising Group's (ACOG) strategic aims to reduce controlled airspace, reduce noise and carbon dioxide emissions. It also fails DP11 because it will not reduce fuel burn.

In conclusion, CPRE believes that these proposals should be firmly rejected by the CAA in order to:

Allow the outcome of the Future Airspace Strategy to be delivered.

Understand and model the long term impact of the pandemic, the Internet and other communication technologies on aviation.

Ensure compliance with UK climate policy and law.

Comply with UK Airspace Modernisation Strategy. Thank you, and I do apologies for my somewhat rusty throat.

THE CHAIR

Thank you very much, Dr James, and well within time. So thank you very, very much. I will just give a quickly recap of the themes I drew out of that whilst I let my colleagues put to you any questions they may have.

Again you felt the consultation did not meet the required standards. There is no option to object, really just decide on which hold you prefer. So you felt the changes were a bit of a done deal. You also felt that the change would impact areas of tranquillity and areas of outstanding natural beauty. You felt the consultation did not include enough information, particularly clear information for people to make informed decisions. You felt the COVID pandemic, the consultation should not have happened in the COVID pandemic, and also the impact of the COVID pandemic on the aviation industry should be considered, and you don't believe the new numbers warrant any change. You also feel consideration must be given to the impact on the environment as well. Hopefully I have covered the key themes you raise there.

DR JAMES

Yes. I think there is also the impact of new technology, the use of the internet. I run companies and we operate globally and we do not visit any more. I used to take three or four flights a day. We now do none.

THE CHAIR

Thank you. Thank you, Dr James. I will just check with my CAA colleagues to see if there are any clarification questions required. Looks like we are all good. So thank you very, very much, Dr James. Really appreciate your time today.

DR JAMES

Thank you for the opportunity.

THE CHAIR

You are welcome. As I say, please do stay on the line if you would like to stay and listen to the rest of the speakers. In the meantime if I could ask you to turn off your camera. Thank you. We only have three more registered speakers but all ahead of schedule. Mr Robinson, so, Neil Robinson, are you on the line?

MR ROBINSON

Good afternoon. I am indeed.

THE CHAIR

Thank you very much for joining us. I am assuming you are quite happy to go a little bit early for us?

MR ROBINSON

Yes, very much so.

THE CHAIR

Perfect. If I could ask you to introduce yourself, please. As you are speaking as an organisation, you also get the ten minute slot as well. If I could ask you to introduce yourself first, please.

MR ROBINSON

My name is Neil Robinson. I work for Manchester Airports Group, who are the owner and operator of Stansted Airport.

THE CHAIR

Thank you very much, Mr Robinson. In that case I will start the clock whenever you are ready.

MR ROBINSON

I am ready to go whenever you are. Good afternoon. My name is Neil Robinson. I work for Manchester Airports Group, which is the owner and operator of London Standard Airport. I am the Director for Corporate Social Responsibility and I am also the Programme Director for the group's future airspace programme, which is our principal contribution to delivering the National Airspace Modernisation Strategy. At Stansted we are reviewing and updating the procedures that apply to both arriving and departing aircraft. We are closely following the CAA's CAP1616 process and taking decisions after engaging with our stakeholders, including our airports. By taking account of feedback from each other, airports are working collectively to develop the airspace system in a coordinated, what best enables us to realise the potential benefits, including efficient operations, that can minimise delays, improve resilience and reduce flight emissions. So currently arriving aircraft that approach Stansted follow standard routes towards the Lorel or Abbot hold. They are then given instructions from Air Traffic Control to enable them to land safely. The standard routes and the Lorel and Abbot hold are shared with aircraft arriving to Luton Airport. The current procedures were designed many years ago when air traffic levels at both airports were much lower than they are. In recent years Stansted Airport has grown strongly. The five years prior to the pandemic had seen an increase in aircraft movements across the whole of the London terminal moving area but especially so in the area around Luton and Stansted Airports. Over this period growth at Stansted has been 19% and at Luton 24%. This compares to only 1% increase at Heathrow and 6% at Gatwick. Whilst we are still emerging from the impact of the global pandemic and restrictions and international travel have in the short-term caused a dramatic fall in passenger numbers, we remain confident in the long-term future of Stansted Airport. We have recently been granted planning permission to raise the limit on the maximum number of passengers allowed to use Stansted Airport from 35 to 43 million passengers per annum and we expect to reach this

level of throughput in the early 2030s. The increased use of the shared arrivals procedures by Luton and Stansted airports have significantly increased the complexity of the airspace and has led to significant operational disruption and delays for our passengers. By way of example, in 2018 the average arrivals delay at Stansted was 22 minutes, one of the highest in Europe. This has both an operational and an environmental impact. I wish to be clear that in my representations today I make no comment on the merit of the AD proposals themselves. The joint sponsors have followed the CAP1616 process and they have been responsible for ensuring that the solution they propose strikes the right balance in response to the issues set out in the statement of needs and the feedback they have received from stakeholders during the design process. My comments relate solely to operations at Stansted. As air traffic at both Luton and Stansted Airports recovers, we expect the demands on the shared procedures to again increase, making the airspace complex and difficult to manage, and we believe it is likely that we will again experience operational impacts and delays to our passengers. Without an intervention such as that proposed by AD 6 it is highly likely that this situation will get progressively worse. The separation in traffic flows that would result from AD 6 with Luton and Stansted Airports no longer sharing arrival routes would, in our view, would greatly relieve the situation. We believe that AD 6 changes offer important benefits for both airports and that AD 6 can make a significant contribution to the overall process of airspace modernisation.

THE CHAIR

Are you all done, Neil?

MR ROBINSON

I am indeed.

THE CHAIR

Lovely stuff. Well within time. Thank you, very, very much. As I say, you have been recorded and transcribed. So do not take my themes as the only themes we are doing today. It is worth just playing some of them back to you as well. Obviously you were keen to stress you are not making a comment on the merits of AD itself, but more commenting on how it relates solely to Stansted only. Essentially you share routes and hold areas at the moment with Luton and, despite the pandemic, you remain confident that in the future of Stansted there will be increased traffic over the coming years, and without this change the airspace will remain complex and difficult to manage and, in fact, it is highly likely that the situation will get worse. I think that covers the key themes that I have covered. Let me just check in with my colleagues from the Airspace Regulation team to see if there is any clarification questions required. No. Some shaking of heads. Perfect. Thank you very, very much. In that case, Neil, thank you very much for your time this afternoon. We do appreciate that. Please do feel free to stay on and listen to the rest of the speakers. We really appreciate you giving up part of your afternoon for us.

MR ROBINSON

Lovely. Thank you very much indeed.

THE CHAIR

Thank you. Take care. The next speaker is not actually on line yet but the final speaker is. Alice Seaman, would you mind going early if that's okay, please, if you are still on the line? Hello, Alice.

MS SEAMAN

That's fine.

THE CHAIR

Sorry to put the pressure on you. As you are here, we will rejig you and hopefully our final speaker will be on by the time you are done, just to try to avoid everyone sat here waiting. Good afternoon anyway. Thank you very much. Can you hear me okay?

MS SEAMAN

I can hear you well, yes.

THE CHAIR

I can see and hear you. Perfect. You are representing an individual today.

MS SEAMAN

Yes.

THE CHAIR

So you will have five minutes to speak. If I could begin by asking you to introduce yourself for our stenographer, please.

MS SEAMAN

Okay. I am a resident of Huntingdonshire, a rural resident and the hold would be over me basically.

THE CHAIR

Your full name, your first and surname, please?

MS SEAMAN

Alice.

THE CHAIR

Whenever you are ready I have my clock ready for you. Over to you.

MS SEAMAN

Okay. I don't think the first three stages of the design proposals have been followed fairly or transparently and it sounds like inaccurate information has been given by the sponsor about the potential noise levels. Basically the design proposal has not followed CAP1616 guidelines number 70 "The prime objective of the Airspace Change Process is that it is as transparent as possible throughout. Those potentially affected by a change in airspace design should feel confident that their voices form a placement in the procedure." In the published list of the stakeholders in step 1B and step 2A stakeholders are represented by communities and councils from three counties, but the county where the stack hold is chosen to be in, Huntingdonshire, part of Cambridgeshire was not one of them. In fact, none of the chosen stakeholders in stage 1 and 2 will be affected by the stack hold location, only the people in Huntingdonshire, who are by definition stakeholders because of the airspace change, ie the hold above them. The effect of the hold only affects them, yet they have not been included in the design process under stage 3, when the public gets the voice. This does not conform to CAA guideline. The stakeholder selection process has to meet the CAA guidelines of being fair, transparent and proportionate. In stage 3 the sponsors consultation document asks "We are seeking your feedback on two options. The video below shows two options, both easterly and westerly operations. Public community feedback is not requested on the hold." Well, that basically confirms that the whole design document to that point has not been transparent or fair to those affected by the airspace changes, and is still not at this stage. Stakeholders living under the hold have been ignored and have not been allowed a formal place in the process. Also by the definition of noise and overflight to be considered only at 7000 feet is being used by the sponsor to silence the voices of those affected by changes in the airspace in a formal place in the process, and is a charge for of the sponsors to locate stack holds in new areas where newly affected stakeholders are not present in the decision-making until the public consultation stage at number 3, where all location decisions have been made. This goes against the government policy to focus on limiting and, where possible, reduce the number of people in the UK adversely affected by aircraft noise and the impact on health and quality of life associated with it. It also goes against NATS' feasibility report into airspace modernisation in the south of the UK and CAA's assurance into the NATS' feasibility report 211, ie "It is a design requirement that the total volume of controlled airspace does not increase." Noise. What is the potential noise impact of the proposal in the holding area? During the LLA and NATS public webinar number at about an hour into the process, a member of the public asked what the cumulative sound of seven aeroplanes in a holding formation would be. The sponsor explains that for a variety of reasons an answer could not be given. When further asked would not the sound level be the same as, say, the sound level of the holding over Royston, which would be known to the sponsor, it was again stated that it could not be compared. The sponsor also explained that at one point 25 minutes into webinar 8 that the 55 decibels level figure was provided by the CAA. 55 decibel is based on one aeroplane at, 7000 feet, not the cumulative total of up to seven planes at the same time. It would be good if the CAA could give a more accurate assessment of the sound level of eight planes rather than one in a holding area so that

people can judge more accurately the expected sound level and health implications. Also can I just say that I was disappointed that the timing of this meeting was stated as pm. I only found the exact time when I put myself forward as a speaker at the week-end, the actual timing of the event today. My husband as a member of the public has not even been informed of the time of the meeting yet.

THE CHAIR

Alice, are you still there? We seem to have lost you or is it just me. No. Oh, Alice, I am sorry. An inopportune time as well. I will just pause the clock just in case we get her back. Let's give her a moment. Let's leave Alice on hold for now. I will just check if our final speaker is on line yet. Unfortunately our final speaker is not on line yet. They are not due to speak for another half an hour, though. So we may have to have a little break at this point and we shall all reconvene, shall we say, at half past. Perfect. Okey-dokey. In that case we will come back at half past. Hopefully we shall have our final speaker by then. In the meantime thank you everyone who has spoken up until this point and I shall see you in minutes. Thank you.

(Short break)

THE CHAIR

Good afternoon again, everyone. I make that half past according to my little computer clock. Alison, I am just going to mute you, if that's okay. Perfect. Thank you very much. Welcome back, Jon. Welcome back, Seonaid. Thank you very much. Melanie, are you back all okay? Can you just give me the nod that you are back just for our ...

COURT REPORTER

Yes.

THE CHAIR

Perfect. Thank you very, very much. Perfect. Okay. Before we go any further, yes, Alice, apologies once again for losing you at the end of the last session. Yesterday you were -- hello again, Alice. Thank you very, very much.

MS SEAMAN

Hi!

THE CHAIR

You still have just over a minute left -- on your time left. So I -- I think, as I discussed earlier, really you had just finished your point about noise and you were moving on to your concerns about the advertising for our public evidence session when you cut out. So perhaps you want to start at the beginning of that again for us, please.

MS SEAMAN

Okay.

THE CHAIR

Whenever you are ready I will start my clock.

MS SEAMAN

Okay. Thank you. Also can I say that I was disappointed that the time of this meeting was just stated as "pm" in the first e-mail, and that's the only e-mail that I received, and I only found out the exact time of this meeting when I put myself forward as a speaker at the week-end. My husband is a member of the public and he was expecting an e-mail saying, you know, the revised time of this meeting. He didn't get anything informing him of the time of meeting, and it is not in his junk mail. So it is a bit disappointing that the time of this public meeting wasn't really made clear. That's my experience and his, yes.

THE CHAIR

Thank you very much, Alice. Did you have anything else you would like to add?

MS SEAMAN

Well, just that it would affect where I live in the open countryside a lot if this holding goes ahead and I don't feel like it has been done correctly, and that's it basically.

THE CHAIR

Okay. Thank you very, very much.

MS SEAMAN

Okay. Thank you.

THE CHAIR

Apologies again for the technical difficulties we have had. Perfect. I will just give just a quick rundown of the key themes. You were concerned about the fact that the stakeholders that were spoken to at the earlier stages, particularly at a representative level, were from the counties unaffected by the change and none from Huntingdon.

MS SEAMAN

Yes.

THE CHAIR

There was concerns about the fact there was no figures around the cumulative noise given when asked by the stakeholder at a specific workshop that you attended. Just generally inadequate information. You felt that the level of , feet consideration for noise was not high enough. Sorry. I'm just going through my notes. And the fact that the programme goes

against government plans to limit the impact of aviation noise where possible. You also commented on your concerns about the advertising of the public evidence session, and that generally you felt that the proposal would have a detrimental effect on yourself and the people in your area.

MS SEAMAN

In the rural area, in the open countryside, yes.

THE CHAIR

Thank you very much, Alice. I am just going to look at Jon and Seonaid just to make sure that they have no clarification questions. No. It looks like we are all good. I have got nothing from the rest of my colleagues either. In that case, Alice, thank you again for your time this afternoon. We really appreciate it.

MS SEAMAN

Thank you.

THE CHAIR

Perfect. Thank you. If I could just ask you just to mute and turn off your camera for us, please.

MS SEAMAN

Okay. Thank you.

THE CHAIR

Thank you. Take care. Perfect. Now our final speaker has contacted us during the little break and unfortunately they are now no longer able to attend the session. So we are now out of speakers. So in that case I will hand across to Jon Round, the Head of Airspace, Air Traffic Management and Aerodromes at the CAA, who just wanted to say a few words off the back of what he has heard today. Thank you. Thank you, Jon.

MR ROUND

Thanks, Alex. Thanks for organising today. Thank you to everyone who has spoken. I just thought, having sat here silent for an hour and a half, you should at least realise we do speak and we have heard everything you have said. We take this session extremely seriously to the point where literally we have both recorded and had a transcriber capture everything you have said verbatim, and we will be taking that all into consideration.

So thank you again for your participation, all of you, taking the time mid-week to prepare and then deliver some very well and articulate arguments. I think that's probably all I am allowed to say under the process, but I wanted you to realise that you had been heard and that we will acknowledge of all those issues as we work through our deliberations.

THE CHAIR

Thank you very much, Jon. On that note I believe I have nothing further to do but to thank again finally everyone who has participated in today's session. I will let you all go now, but thank you all very, very much. Enjoy the rest of your afternoon. Take care.

DR JAMES

Thank you, Alex.

THE CHAIR

You are very, very welcome, Dr James. Take care, everyone.

MR ROUND

Well done, Alex. Thanks a lot. Bye.