ACP2018-65 SAIP AD 6 – Public Evidence Session Summary and CAA Response

Written Feedback	Summary ¹ of Evidence –	CAA Response – will only take
	Technical, Consultation,	account and respond to
	Environmental, Economic, General.	comments/feed-back that relate to this proposal.
Warren Vaughan	Consultation – Response to	Technical – see Operational
	Noise priorities above/below	Assessment (hold position
	7000ft. Potton and	options were constrained).
	surrounding villages not	Consultation – see
	listened too, 'fait accompli'.	Consultation Assessment
	Technical - Hold position, pre-	
	determined.	
Anonymous	Support for Option 1.	
Bruce Robertson	Technical - Hold position over	Technical – see Operational
	St Neots, consider moving	Assessment (hold position
	'stack' 2-3 miles west, hold	options were constrained).
	position should be south of	Environment – Local Air
	A421 and west of A1 corridor,	Quality. See Environmental
	consider delaying aircraft until	Assessment Section 9
	they have a landing slot, so no	
	need to 'stack'.	
	Environmental - air pollution	
	effecting world's climate,	
	reduce flying.	
Anonymous	Consultation- flawed,	Technical – see Operational
	considerable number of	Assessment (hold position
	people unaware, they have	options were constrained a
	not objected as they feel it	hold is used to reduce risk).
	would make no difference to the outcome. Ballooning	Consultation – see Consultation Assessment
	the outcome. Ballooning acquaintance not aware of	Economic – see Final Options
	proposal.	Appraisal Assessment.
	Technical - Positioning of	Environmental – Noise under
	'stack' was fait-accompli.	hold. see Environmental
	Environmental - Revision of	Assessment Section 7
	position of stack displaces	Environmental – CO ₂
	flying activity to areas where	Emissions. see Environmental
	very little noise. Increase in	Assessment Section 8
	people affected by	Environmental – Noise
	environmental noise. Aircraft	impacts on health. See
	flying at and above 9000ft	Environmental Assessment
	make sufficient noise to drown	Section 7.
	out birdsong. Additional noise	Environmental – CO2
	will affect mental and physical	emissions. See Environmental
	health. Aviation planners	Assessment Section 8
	should give high priority to	
	reducing C02; consider COP26.	

¹ A succinct summary of key points taken from CAP2263 on the CAA Airspace Change Portal.

Economic - Newspaper article in 2018 showed 48% residents in England did not fly abroad. Holding stack is counter to reducing CO2 output. 285kg of CO2 per flight increase.		
reducing CO2 output. 285kg of	in 2018 showed 48% residents in England did not fly abroad.	
	Holding stack is counter to reducing CO2 output. 285kg of	

Verbal Feedback – CAP2263	Summary of Evidence	CAA Response
Ms Mitchell	Environmental – noise under CLN CTA10, increase density of aircraft and intensity of noise. 9 aircraft per hour noise over 55dB, withdraw proposal. No extrapolation of noise data. Told to find info.	Environmental – Noise under CLN CTA10. See Environmental Assessment Section 7 Consultation – see Consultation Assessment
	Consultation – letter written to MP. Failings in consultation process; complicated documents. Unable to understand noise impacts. Quality of survey and inclusive sample design were lacking; 'choice between two bad options'. Consultation did not take account of people without computers; should have been delayed.	
Mr Williams	Technical – Increase capacity at Luton Airport, this is all about business. Stagger arrivals to avoid stacking. Proposed stack and narrow approach path are obsolete. Economics – will demand increase. Covid 19 will continue to cause transport disruptions. EU workers no longer flying from Luton. Business flights will be reduced. Luton capacity breached (19million passengers 8 years early).	Technical – see Operational Assessment (capacity in specific ATC sectors impacted, a hold is used to reduce risk). Consultation – see Consultation Assessment Environmental - Noise limits enshrined in planning conditions are outside of the scope of CAA assessment.

	Environmental — Luton in breach of noise limits. Luton airport proposal has not followed CAA requirements on assessing noise impacts. Consultation — staged during pandemic. Potton Town Council written to once. Central Beds voted against change. Recommence process due to lack of options and Covid-19. No real choice offered. 4th Gunning Principle not applied.	
Mr Balicki	Technical – Stack will be over Huntingdon. Consultation – No option to not approve the change. Outside of the AMS, not aligned with Gunning Principles. Environmental – Flight path along A14 will increase noise, Current noise not recorded for future comparison. Economic- no benefits to counties that are overflown, only Luton benefits.	Technical – see Operational Assessment (hold position options were constrained). Consultation – see Consultation Assessment. Economic – see Final Options Appraisal Assessment. Environmental – n/a.
Mr Barratt	Environmental/Consultation — Routes fly overfly rural areas and not urban area, noise pollution will have a far greater impact. Should be over urban areas. Destroying tranquillity, impacting wellbeing. Consultation — only two routes presented for comment, both options result in overflying our villages. Parish council should have been consulted on planned routes earlier.	Environmental – See Environmental Assessment Section 10. See Consultation Assessment also. Consultation – see Consultation Assessment

	Consultation is flawed.	
	couriens an objected.	
Mr Ridewood	Regional MPS and local councils all objected. Technical — re-orientation of the hold has not achieved the desired outcomes, impacts are now greater. Consider moving the hold further north-west-west and alter orientation; move over open countryside. FASI-S, linear holds. Will this align with the Masterplan. CAP2156A, 'by removing holds'. Outdated holding stack. Environmental — North Wolds and conservation areas are now subject to greater noise. Consider St Neots, Pertenhall, Tilbrook, Catworth, Leighton Bromswold, Buckworth, the Offords and Little Paxton. Was told by Sponsor that lowest aircraft in hold creates noise and can't measure cumulative noise in the hold. No indication of frequency or number in hold. No indication of frequency or number in hold. Noise impacts do not align with the AMS. Health concerns; 45 dB during the day and 40dB at night. Natura 200 site Portholme Meadow. Consultation — a fait accompli no ability to comment on upper hold design. ICCAN toolkit not followed. Application is premature. Hold position is now not in area that was consulted. Economic — Covid-19 impacts	Technical – see Operational Assessment (hold position options were constrained). A Hold is a method to mitigate risk. Economic – see justification in Operational Assessment. Consultation – see Consultation Assessment. Environmental – North Wolds and conservation areas. See Environmental Assessment Section 14 Environmental – Noise under hold. See Environmental Assessment Section 7 Environmental – Noise impacts on health. See Environmental Assessment Section 7, 45dB and 40dB is not relevant to this assessment; LOAEL is used. Environmental – Natura 2000 Habitat. See Environmental Assessment Section 14.
	67% downturn in global air	
	travel. This ACP does not align	
	with fuel efficiency, air quality	
	and noise reduction.	
Driamas		Tooknigal and Facuration and
Dr James	Consultation - MPs across	Technical and Economic – see
	Cambridgeshire and	Operational Assessment for

Bedfordshire, local Authorities and CPRE oppose proposal. Consultation did not meet CAP1616 **ICACAN** or recommendations. Large number of people unaware. Could not object only select preference, breach of Gunning principles. CPRE received no response and are not mentioned in the response document, responses not analysed adequately.

Environmental – major impact Cambridgeshire and Bedfordshire, conflict with government plans, hold area is tranguillity area and candidate AONB Great Ouse Valley. Documents are not clear understand enough to proposals, no noise maps for hold. Concentrated noise over Abbotsley, Gamlingay, significant impact Sandy, Potton, Biggleswade. This proposal does not align with the UKS net zero carbon target.

Economic – Proposal is premature, global air traffic down by 67%, CEO Gatwick does not envisage aviation recovery until 2025/26. Reduced fleet sizes and less business flying.

Technical – Expected number of aircraft using the hold is not clear.

Proposal should be paused to align with Masterplan, such as removing holds. Proposal should only pass through a Gateway if it aligns with AMS. Proposal should align with FASI(S). NATS Southern Masterplan to reduce terminal holding areas. Aviation 2050 doc anticipates reducing noise

justification and hold usage is answered in clarification questions.

Consultation - see
Consultation Assessment
Environmental - Tranquillity
(AONB). See Environmental
Assessment Section 14. Noted
the proposal does not align
with the UKs net zero carbon
target.

	and carbon emissions by limiting use of holds. NATS agree holding stacks are inflexible and have environmental disbenefits. The Luton DCO is not in the scope of this ACP and will not be commented on. Proposal does not align with ACOGs strategic aims.	
Mr Robinson	Technical – Current STARs and holds shared with Stanstead. Significantly increases complexity of airspace and causes significant operational disruption, environmental impact. As traffic recovers, airspace difficult to manage, likely to experience operational impacts and delays to passengers. Significant contribution to process of airspace moderisation. Economic – 5 years prior to pandemic increase in traffic Stanstead 19% and Luton 24%. Stanstead can raise passenger limit from 35 to 43 million passengers per annum.	No response required.
Ms Seaman	Technical – First 3 stages not followed fairly and transparently. The total volume of airspace should not increase. Environmental – Inaccurate noise information. Government policy limiting or reducing number of people effected by aircraft noise. No information on potential noise from the hold. Could CAA provide information on 8 aircraft in the hold? The hold will affect the open countryside. Consultation – Stakeholders at Stage 1- 2 will not be affected	Technical – see decision CAP for details of process, see Operational Assessment for justification of CAS. Consultation – see Consultation Assessment Environmental – Noise under hold. See Environmental Assessment Section 7 Environmental – Tranquillity. See Environmental Assessment Section 10

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by the stack hold. People in	
Huntingdon are stakeholders	
because the hold is above	
them. They were not included	
at Stage 3. Public community	
feed-back is not requested on	
the hold. Design document has	
not been fair and transparent.	
Stakeholders where the	
change is below 7000ft are	
only considered. Timing of PES	
not well publicised.	