

Hatley Parish Council

From
SIMON KEITH
Chairman of Hatley Parish Council
The Palace
East Hatley
Sandy
SG19 3JA

16 June 2008

To TCN Consultation,
NATS Freepost,
NAT22750,
READING
RG1 4BR

Dear Sirs,

NATIONAL AIR TRAFFIC SERVICES PUBLIC CONSULTATION PROPOSED REPOSITIONING OF THE LUTON AIRPORT HOLD AREA

As Chairman of the Hatley Parish Council, I write to express our concerns about the proposal to relocate the Luton hold area over Hatley St George and East Hatley and to object to this proposal.

We have had the benefit of seeing the letter to you expressing the South Cambridgeshire District Council's concerns and objections and also the letter of 12th June sent to you by our County Councillor, Sebastian Kindersley, which sets out his objections. We strongly agree with the points made in those letters, particularly those relating to noise, and support the views expressed. Many residents have also signed online and 'paper' petitions.

I will not re-state all the points in the two letters but highlight our special concerns. The brevity of this response should not disguise the seriousness with which we view the proposal

East Hatley and Hatley St George are small rural villages (together comprising about 80 houses and farms) situated on the western border of the county of Cambridgeshire (TL2851) in the South Cambridgeshire DC area at an elevation of about 70m above Ordnance datum. The new hold pattern shows the Hatleys to be directly under the southern end of the new proposed hold area. They would be directly and adversely affected by the proposal.

As we are in a rural area away from any main roads the ambient noise level in the villages is low. Any additional noise is therefore particularly noticeable. This would not be the case in an urban situation. In general, the residents of the Hatleys have chosen rural tranquillity over the greater level services provided in a noisier urban setting. The NATS proposal threatens to erode this rural tranquillity for no discernible advantage to the residents of the village.

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We already suffer from some aircraft noise. There are three light aircraft airfields within 4 km of the Hatleys and we know from experience over some years that the noise of light aircraft can often be obtrusive. The view of Hatley Parish Council is that the relocation of the Luton hold will be different in two important respects.

Firstly there is a continuing dialogue between village residents and those controlling the light aircraft airfields. Although the outcome of those discussions can never be to the satisfaction of all, at least there is the opportunity to get flight paths modified and limit usage of aircraft, and know to whom to complain when agreements are breached. Such personal and local dialogue will presumably not be available in relation to the usage for the proposed relocated Luton hold pattern. Certainly, the level of consultation thus far between your authority and those who could be affected by the proposed relocation has done nothing to dispel these misgivings. The NATS proposal should state how to express complaints if the new proposal is implemented unsatisfactorily and consultation on any future intensification of stack use would be conducted.

Secondly, large aircraft, turning and flying relatively slowly in a hold pattern, will cause noise in the Hatleys which will be at a very much greater level and will be much more obtrusive than that from light aircraft. Moreover, the light aircraft only fly during daylight hours, usually around the middle of the day and in summer, whereas airliners will fly more frequently at almost all hours and in all seasons of the year. We understand that noise levels can go up to 61 db and this is well above the accepted 'threshold of disturbance' of 57 db and above the EU and WHO guidelines of 55 db. This predictably greater level of noise is the main basis of our objection to the proposal.

I must add that, as we see it, this consultation has been improperly and possibly illegally conducted. Legal guidelines for consultations state that consultees should be presented with a range of different options from which to choose. In this case, we have been presented with one option and told to 'take it or leave it'. In our opinion, the sensible course of action in this case would have been to place the holding areas over districts that are largely urbanised and where the additional noise from aircraft would thus be significantly less noticeable, for example along the A1 corridor.

Lastly, in a situation where the UK is committed to cutting its greenhouse gas emissions and aviation emissions are already the fastest growing source, it seems perverse to plan for ever increasing flights and hence emissions. Moreover, placing aircraft in holding patterns, in itself, increases emissions and the aim should thus be to dispense with the concept of holding altogether, except in emergencies.

Yours faithfully

Simon KEITH
Chairman, Hatley Parish Council