

Response from the Dedham Vale Society to NATS Terminal Control North – Proposed Changes to Airspace

We are grateful for the extension of the period for consultation as it has enabled a much wider response from our members.

As a result of these consultations and discussions with our committee, on behalf of the **Dedham Vale Society (DVS)**, I can now respond as follows:

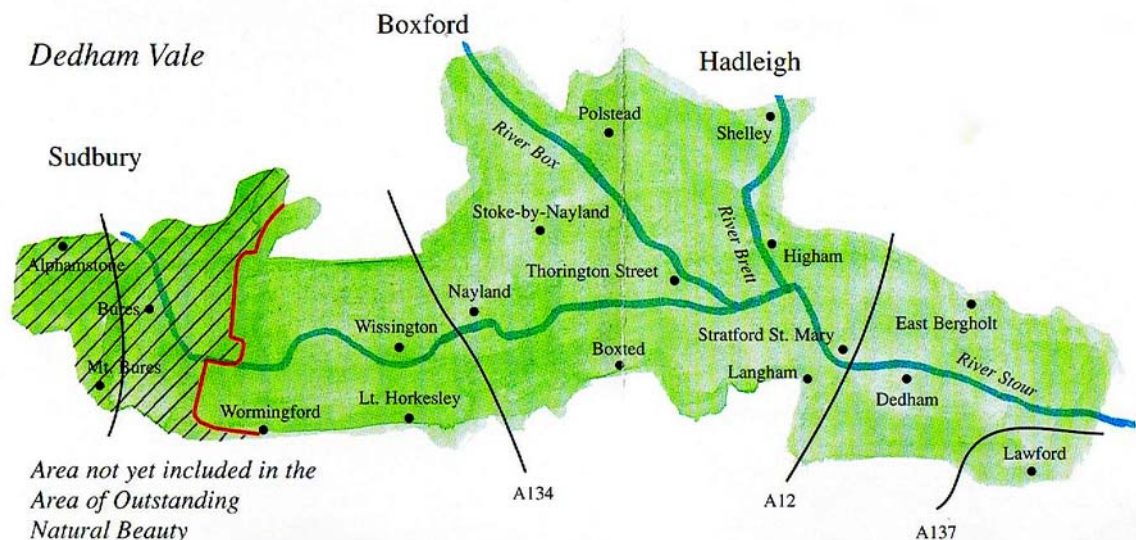
- On the whole **The Dedham Vale Society strongly supports NATS proposals and believes the policy of aligning flight-paths with main trunk roads such as the A14 where the ambient noise factor is already high, is sensible. Provided that the flight-paths indicated in the consultation as they affect the AONB are adhered to we believe, subject to the matters set out below, that the proposals have the potential to meet the concerns which led the Society to pursue its judicial review before Mr Justice Newman. In this regard, DVS wishes to associate itself with the observations of the Stour and Orwell Society and with those of Mr Thomas Hill.**
- We do however **strongly oppose one aspect of NATS proposals which will have a seriously adverse impact on the north-western edge of the AONB and the area of its proposed extension to the west.**
- We have a number of matters where we ask for clarification.
- We believe one of NATS key criteria for routing flight-paths is seriously flawed and may be illegal as it contravenes an EU Directive.

Departures from the proposed Eastern Stansted-bound hold

The proposal which we strongly oppose is in respect of ***departures from the Eastern Hold*** over the Stowmarket area.

DVS notes that it is proposed that both Easterly and Westerly arrivals into Stansted will follow a steep southerly dog-leg which will take them over the western edges of the Area of Outstanding Natural Beauty (AONB) and the area which The Dedham Vale Society has long campaigned to have included in the AONB.

This area adjoins the western edge of the AONB and comprises the parishes of Bures, Mount Bures, Lamarsh and Alhamstone. The DVS website gives the area involved. (www.dedhamvalesociety.org.uk) We also attach a map from our literature which shows the area in question. (as shown below)



Although the parishes we have listed above are not yet in the AONB, they are all part of an **Area of Special Landscape Value**.

Whilst we have noted in the NATS consultation document about the reasons for dog-legs in your “answers to commonly asked questions”, it would seem that **this particular dog-leg is unnecessarily deep**.

The obvious straightest, quickest and cheapest route from the Eastern hold would be to fly out of it just North of Sudbury straight into Stansted.

If a priority is to avoid Sudbury, then a **dogleg over Great Cornard, just to the South, would be more sensible than the one proposed. Much of this area is covered with industrial buildings, where aircraft noise is not an issue and the ambient noise level is much higher than in the quiet and pretty villages further South**. Again, **it would provide a cheaper, quicker solution**.

The four villages in question suffer from no fewer than 10 flight paths. The outbound flights are normally high enough not to cause problems, although these aircraft can be heard on still evenings, but the new flight path descending from the Eastern Hold into Stansted will destroy the area’s tranquillity if it is to be used frequently.

There is virtually no ambient noise in these parishes, especially in Lamarsh and Alphamstone and incoming jet aircraft noise, which has been such a soul-destroying feature for these parishes since 1999, is deeply offensive and will prejudice their eventual inclusion in the AONB.

The Dedham Vale Society strongly urges that NATS adjusts the centre line for this flight-path for a shallower dog-leg further North in this instance.

Matters for clarification

It is not clear from the documentation what the extent of “tactical vectoring” will be under the new proposals. We need to know the extent to which this practice, which we understand to mean **where aircraft actually fly** as opposed to the main flight-paths shown on NATS consultation plans, will be followed.

We believe we are entitled to a broad understanding of how this may continue to affect the Dedham Vale AONB as a result of the ruling by Mr Justice Newman that **specific account is taken of the impact on Dedham Vale and Stour & Orwell AONBs**.

- How many aircraft are expected to arrive at Stansted from the East **on average** each day?
- Please could NATS give a percentage range of aircraft which will continue to fly over the AONB. *For example: 1-3% of Easterly arrivals.*
- Under what circumstances are the Eastern and Western Stansted holds to be used? Is this a factor of weather or are a certain proportion of aircraft to be sent to each hold. If the latter, what percentage of air traffic to the Eastern hold and what to the West?
- We understand that the holds are used when traffic is heavy, normally in the early morning and evening with greater volumes in summer than in winter. However, for much of the time when traffic is lighter, holds will not be required.
- Please could NATS confirm that in this case **aircraft will be obliged** to follow the more northerly route, roughly over the coast from Felixstowe northwards and then along the A14 corridor and down direct to Stansted from a point north of Sudbury between the Eastern and Western holds.

These points are enormously important to our members.

We appreciate that NATS cannot give answers to these questions with pinpoint accuracy and that the issues of safety and weather conditions will cause substantial variations, but it would be enormously helpful in explaining the likely impact of the airspace changes to our members if NATS could give average ranges of figures and give us an understanding of when the various hold and direct flight options will be used.

In some instances it might well reduce the alarm felt in many quarters about the likely impact compared with the present situation.

NATS Flight-path Principles

We believe there is one major issue in which the principle that NATS has used appears to us to be seriously flawed. This is "*overflying areas of low population is to be preferred where possible*".

The European Directive on Environmental Noise 2002 states that ***member states should maintain environmental noise quality where it is currently good. Routing aircraft over rural areas which have the designation "Areas of Special Landscape Value" and which have almost no background noise, would seem to contravene this Directive.***

In addition, these areas, whilst having a lower population, are also treasured by nearby urban populations as tranquil places to visit and these visitors are a vital part of their economy.

Residents move there because they are sensitive to noise and require tranquillity as a priority in their lives.

Tranquillity is much less of a priority for most urban dwellers.

We have confined our remarks to the specific matters which affect the area covered by the Dedham Vale Society but for the record, we will strenuously oppose the expansion of Stansted airport and in particular the construction of a second runway.

***On behalf of the Dedham Vale Society
Robert Erith TD DL, President 10th June 2008.***