



Planning & Building Control

Please ask for: J Woof

Telephone:

E-mail:

Date: 10/09/18

Dear Sir/Madam,

RE: Draft Airspace Modernisation Strategy July 2018

Thank you for providing St Albans City and District Council (SACDC) with the opportunity to provide comments on the Draft Airspace Modernisation Strategy consultation.

Aircraft noise has become a very major issue for St Albans District residents in recent years. They have been particularly affected by an increase in air traffic departing over the District and the introduction of RNAV at London Luton Airport (LLA). Noise problems caused by LLA air traffic are exacerbated by the low height restrictions imposed by other airspace users and the incorrect assumption that narrowing of the flightpath using RNAV will reduce noise impact, which has not been the case. Also, departures from Heathrow airport regularly fly over St Albans District at a relatively low height causing noise disturbance.

Although the airport is located out of SACDC's administrative area and this Council does not have a role in controlling airport operations or flight paths, our residents are very interested in these issues. Evidence for this includes a public meeting of the SACDC Planning, Resources and Housing Scrutiny Committee held 17 May 2017 which had approximately 90 public attendees with more watching the webcast (minutes can be found at:

<http://stalbans.moderngov.co.uk/ieListDocuments.aspx?CId=518&MId=8367&Ver=4>)

This resulted in an item to Cabinet, held 25 July 2017 (minutes can be found at:

<http://stalbans.moderngov.co.uk/ieListDocuments.aspx?CId=117&MId=8310&Ver=4>)

A number of residents groups have been established opposed to the increase in noise. A Working Group has also been set up, consisting of SACDC Councillors and Officers, representatives from Harpenden Sky, Luton and District Association for the Control of Aircraft Noise (LADACAN) and St Albans Quieter Skies (STAQS) and representatives from LLA. Its key aims include raising awareness of aviation issues in the District, campaigning to reduce the LLA air traffic impact, and consolidating the views of residents plus the campaign groups to support the SACDC representative on LLACC.

Both the Council and its Members still receive regular complaints relating to noise impacts from London Luton Airport (LLA). As a result the Working Group is still very much active.

The CAA should put environmental impacts, and primarily noise impacts, higher up their agenda. The CAA should not just prioritise air traffic growth. Although the Strategy states in paragraph 3.21 that overall, airspace modernisation is expected to result in a reduction in the average noise levels per flight, the Strategy appears to focus on managing noise levels rather than reducing them. The objectives set out in

paragraph 1.11 do not seek any reduction in noise levels. The only noise related objective seeks to “*enable policies that determine how noise should be distributed to manage the impact of growth on communities*”. As raised above, noise is a major issue for residents of St Albans District, and for other local communities, which in relation to LLA can be seen from the dramatic increase in noise complaints over the last few years. Merely managing noise impacts is insufficient.

The Council’s overall view is that the CAA’s airspace modernisation procedures should incorporate a process that enables quicker changes or adjustments to be made. We understand that LLA may be willing to provide improvements for affected residents, including looking at increasing the climb rate of aircraft after departure, developing an additional route and providing respite routes. However, we are informed that the CAA process to bring these mitigation measures into effect takes years and provides no opportunity for short-term, experimental or interim, solutions.

My Council strongly supports wider changes to the UK’s airspace which would allow departures from LLA to climb higher earlier so as to reduce noise impacts on communities under, or near to, the flightpath. For example, currently flights departing LLA are regularly held at low altitude by Heathrow flights flying their Brookmans Park and Buzad departure routes.

SACDC also believe that the Independent Commission on Civil Aviation Noise (ICCAN) must have a stronger role in future. SACDC raise concerns that paragraph 32 .1 of the Strategy states that the ICCAN “may also have a role in the future”. Given that the ICCAN is being established to help build trust with communities and improve how noise is taken into account, it is key that the ICCAN must have a central role in decisions on future airspace change.

According to the CAA 5 Year Strategic Plan “*The public and local communities want transparency and fairness as to how their concerns are dealt with, for example around the noise impact of aviation. We intervene to balance the interests of multiple stakeholders, accepting that what is in the interests of one stakeholder may not be in the interests of another*”. SACDC want to see this commitment carried out in the CAA Airspace Modernisation Strategy and not just “noise management”.

SACDC trust that the above comments will be taken into consideration.

Yours faithfully,



Cllr S Gaygusuz
Business and Community Portfolio Holder