



30 April 2008

Head of Business Management
 Directorate of Airspace Policy
 Civil Aviation Authority
 CAA House
 45-59 Kingsway
 London
 WC2B 6TE

Dear Sir,

NATS consultation on airspace change proposals – Terminal Control North

I write to complain that National Air Traffic Services, in its conduct of this consultation, has failed to comply with the guidance set out in CAP 725 in several respects:

- a) It has provided no address or contact for queries from consultees (CAP 725, Stage 3, Page 9, para 22) in the consultation documents or on the supporting web site. The only mention of questions I have encountered is on the online response form and in the message which the respondent receives after successfully completing this form. These direct the respondent to the FAQ page where there is no contact provided. I have twice sent messages pointing out this omission to NATS through their main web site but have received no response after four weeks.

The many Councils, organisations and individuals who have sent questions to the address for responses to the consultation have, after a period of many weeks, yet to receive any response from NATS.

- b) NATS appears to expect local authorities to conduct its consultation with the public by proxy. Among the main stakeholders in this proposal are residents, homeowners and landowners. Local Councils are ill-equipped to publicise and interpret the consultation especially as the timing of the consultation coincides with the local election period when Councils and Councillors have difficulty dealing with such controversial matters and local media are hampered by the requirements of political balance.
- c) It has failed to exhibit both realism and flexibility in engaging with the public. It has refused to distribute the material to interested parties, relying instead on their having the broadband Internet access necessary for the voluminous documents. The only alternative provision, through public libraries, has failed: the first three local libraries on NATS' list (only found on the web site) which I approached had not heard of the consultation. In the fourth, there were very few copies of the paper response form.
- d) NATS has failed to publicise the consultation adequately to encourage people to participate. The initial media release was accompanied by a claim that the number

of people overflowed was to be reduced by 20 per cent, not a message designed to engage the public. This was especially unhelpful at Luton where, on one set of estimates from NATS, the real story is that over three quarters of the population currently overflowed will cease to be overflowed while an almost equivalent number will be newly overflowed. It is especially important that this latter group be informed.

The distribution of leaflets through Councils has been patchy especially as we understand that leaflets for the wrong area were often supplied. I witnessed this for myself at the main offices of North Hertfordshire District Council where I found leaflets for the Cambridge and Suffolk area on display to the public.

- e) NATS has refused to engage with the public directly to explain the proposals even where Councils have offered to provide a forum for this.
- f) NATS failed to include long-established local aviation residents groups such as Stop Stansted Expansion, HACAN Clearskies and LADACAN in the formal stakeholder list. These organisations have much more experience than most District and Borough Councils in local aviation matters and are now busy trying to advise these and the third-tier Councils on the implications of the proposals, an unreasonable burden for voluntary groups, especially for SSE which, as you know, is currently having to deal with the second runway planning application for Stansted.

NATS would have been well advised to involve these organisations in the focus groups which, we assume, were run during the development of the proposals.

- g) The online response form, which is the method preferred by NATS, has an in-built bias: the respondent is not permitted to remain neutral on the specific question about whether arrivals should be routed by "direct flight path" or "specified routes".

LADACAN believes that the consultation process has been totally inadequate to deal with a proposal which has such important implications for the quality of life of hundreds of thousands of people.

Yours faithfully,

Dr Roger Wood
for LADACAN

cc Barbara Follett, MP
Rt Hon Peter Lilley MP
Margaret Moran MP
NATS