

CAGNE
Communities Against Gatwick
Noise Emissions
The umbrella aviation community and
environment group for Sussex, Surrey and Kent

20th June 2020

CAA CAP 1887 consultation

CAGNE provides the following in response to the Airspace Change Masterplan Criteria CAP 1887 consultation paper (to close on June 26th). CAGNE is the umbrella aviation community and environmental group for Sussex, Surrey and Kent.

This current consultation on the Airspace Change Masterplan Criteria CAP 1887 is based upon the 2017 Air Navigation Guidance, which is based on the dubious CAP 1506a SoNA 2014 work.

It would seem that this consultation on Master Plans purely seeks to facilitate growth in the aviation sector without a balance on the environmental damage caused by aviation (Environmental Charges CAP 1576 does not reflect true cost to communities and planet) in the air and on the ground. CAGNE therefore strongly objects to this paper being taken forward and calls again for an ombudsman/ watchdog be appointed to oversee decisions and papers produced by the CAA, as it is too close to the industry to be objective.

The CAGNE comments are as follows:

- The CAA should not have conducted this consultation through the Coronavirus lockdown.
- This consultation should not take place during a time when aviation is grounded and citizens are enjoying a respite from aircraft noise; as such, they may be switched off to CAA actions that may, long term, affect them with an increase in noise or new aircraft noise.
- The CAA has a duty of care to all UK citizens; by not promoting the consultation to a wider audience the CAA is discriminating against many that could be unknowingly impacted by what is proposed.

This makes this consultation not fit for purpose as the CAA has not looked to engage with all citizens that could be impacted by what is proposed in CAP 1887.

From the CAA's own survey on noise impact in 2017, CAP 1767 respondents detail 'frustration' and expect the CAA, as an organisation, to reduce noise. Aircraft

numbers increasing, flying low, early morning movements and night flights are high in the results of complaints against aviation, with the majority stating that aircraft noise has increased over 5 years. The CAA CAP 1498 also found that the definition of overflight is far greater than accepted by the CAA and the industry, so is impacting more communities that are not accounted for in SoNA or in CAA and government figures; hence, the data that changes are based on is flawed by the CAA own results.

- The NPS and this CAP 1887 is flawed as it is based on dubious research – SoNA – which focused findings on Heathrow, and as such does not provide balance and conclusive findings of all aircraft noise issues such as social expectations as researched in the CPRE Flight Blight document of 2019.
- ACOG is fed into by ANEG which does not facilitate all communities being consulted, only select noise groups; as such any decisions are unsafe and biased by CAA and DfT design.
- We request again that ICCAN have statutory powers over the whole industry, with a brief to balance the need of ALL communities, and not just aircraft noise groups as is the case on ANEG headed up by the CAA, Mark Swan.
- In the CAA's own CAP 1616, airport/ airspace changes must illustrate that a consultation has taken place; we find the CAP 1887 has failed this.

The CAP 1616 process has already been illustrated as flawed at Gatwick Airport FASIS consultation to date. With Stage 1 progressing to Stage 2, Gatwick have cherry-picked an imbalance of aircraft noise groups (NMB) to 'engage with', which has resulted in NPRs being removed before Stage 3 of the public consultation. With NPRs removed, no clear details are now given in Gatwick's Stage 2 papers of their historic importance; as such the public are being led 'blind' into Stage 3 of FASIS CAP. This obviously allows Gatwick to fly over new areas to increase capacity, as happened in the trial of February 2014 ADNID which was subsequently strongly objected to by those not consulted through GATCOM (the government consultative committee).

- Page 6 of CAP 1887 executive summary is to be strongly opposed - *'where airspace changes can deliver air quality or fuel efficiency benefits; where airspace changes are needed to allow improved access to airspace for all users, for example where the existence of controlled airspace is no longer justified'*;

Page 28, points 8 and 9 – once again, too much reliance is placed upon a non-elected body to facilitate aviation growth, with little consideration of environmental impact. We also find the reliance upon ANOG dangerous as it is fed into by ANEG. The pretence of reducing noise and saving fuel/ CO₂ is being used as promotional tools to allow growth, as any saving of CO₂ is wiped

out by growth of aircraft numbers, and potentially impacts new communities who have no voice on ANEG.

- “Reasoning” - other potential solutions identified by ACOG and sponsors again raise concerns, as the Department for Transport has appointed three or four individuals from aircraft noise groups in London.

We quote the following statement (Page 4, point 7):

*“The CAA and the Department for Transport (DfT), have commissioned NERL to lead the FASI-South programme to create a coordinated plan for airspace changes in the South of the UK (or Masterplan for short). NERL has been asked to establish **an impartial team** known as the Airspace Change Organising Group (ACOG) to carry out this task. In due course the Masterplan will identify the individual airspace design changes that will need to be developed to achieve the necessary modernisation.”*

The individuals appointed by the DfT do not consult other communities on papers or actions submitted to ANEG. ACOG, as such, does not have any independent environmental or independent community input; this illustrates that they do not represent ALL communities, especially those that could be newly impacted by the modernisation of airspace, as noise is moved from one community to over another, to save CO₂ or to give respite to others while clearly allowing aviation to grow as a result of PRNAV and removal of NPRs (e.g. Gatwick Airport).

- We do not agree that these changes will ‘reduce noise’, ‘to move the route to stop conflict’, but will increase noise for a greater number of UK citizens, clearly going against government policy.
- A weak global economy threatens investment in renewable energy sources, particularly given the availability of cheap oil. Airbus and Rolls Royce have already stopped their work into electric planes. With the demise of airline profits, alternative fuels for aviation would seem not to be a reality for many years to come. Fossil fuels will therefore continue to be a major contributor to air pollution and global warming. Even the investment by government (announced 12.6.20) is only explorative, and cannot be relied upon to reduce the future of aviation’s environmental damage to the planet.

The owner of British Airways has said that it does not expect its aviation markets to recover until 2023, and that when it gets going again in the summer (2020), it will operate only at half capacity. ⁱ

The aircraft manufacturer Airbus plans to produce on average 40 aircraft of the A320neo family per month, down from a previous near-term target of 63. They will also reduce A330/A330neo output to two aircraft per month from the

pre-crisis production level of 40 per year (40% reduction). A350 deliveries are reduced from between nine and ten aircraft per month, to just six.

Airbus supplied 122 aircraft in the first quarter of 2020, 36 of which were in March. According to the company's latest orders and delivery figures, they included two A220s, 19 A320neos, one A321ceo, ten A321neos, one A330-200 and three A350s. Airbus produced 60 more aircraft that were not delivered in the quarter because of the COVID-19 impact.

In an unprecedented move, the three leading British aviation industry groupings ADS (the former SBAC with 1,100 UK member businesses in the aerospace, defence and security industries), Airlines UK, and the Airport Operators Association (AOA) have jointly called for Government to extend support schemes before companies face difficult decisions affecting their workforces. Prior to this, government has operated rescue packages due to the demise of airlines costing the taxpayer for repatriation. This clearly illustrates that current aviation pricing is not sustainable; as such, the industry as a whole must charge the consumer to pay for the environmental damage caused, reflecting the true cost of flying.

- This decline also risks government relaxing environmental policies for aviation during this time of crisis, as is already starting to happen in the US and Europe.

The international aviation body, Corsia is small in comparison to the industry, and hence its lobbying power is small in comparison to the environmental impact aviation is having. Offsets are worthless, and so any incremental increase in the number of offsets to be purchased is irrelevant, both financially and from a climate point-of-view.

- Page 7 'Information on trade-offs' is worrying, as the CAA seeks to allow aviation to play 'god' with peoples lives in '*choice or decision to resolve a conflict known as 'trade off'. It can arise between two sponsors of airspace changes wanting to use the same airspace or between two objectives of an airspace change proposal such as achieving a noise reduction and achieving **growth in capacity. Where there could be potential trade offs on government policy objectives that could be delivered by different solutions, the CAA would want to understand the potential consequences as soon as possible***'.

We strongly object to the above and call again for the CAA to be controlled by an ombudsman; they are clearly seeking to play 'judge and jury' in airspace changes without a balance of what impact these 'trade offs' would have on those on the ground.

- CPA1887 - Appendix A04 – noise - NERL has been commissioned to set up ACOG to prepare a Masterplan that meets the following criteria:

'B. Identifies other changes that may be required to deliver one or more of the following benefits:

..... • where airspace changes can reduce noise (more specifically, reduce the total adverse effects of noise, as set out in the Secretary of State's guidance to the CAA on its environmental duties known as the Air Navigation Guidance 2017);'

SOAEL and LOAEL would seem to be inadequate, as through a FOI relating to Heathrow the "DfT didn't want to confirm how NPS SOAEL set; DEFRA confirmed they weren't involved." ^{ii iii}

New metrics that take on board other factors, in addition to noise metrics, over the disturbance made by aircraft flying, must be put in place before any modernisation of airspace can go forward. Noise contours must truly reflect the noise impact, by expanding to encapsulate the totality of aircraft noise over communities.

The newly-formed ICCAN (in May 2019) does not seem to yet be in a position to comment; communities will have to wait until ICCAN produces a noise survey that is fit-for-purpose, that embraces all community noise concerns relating to aviation, not basing its findings predominantly around Heathrow (as was the case with the SoNA report).

- CAGNE is highly sceptical that in the current consultation on the Airspace Change Masterplan Criteria CAP 1887, CAA is enshrining the 2017 Air Navigation Guidance, which is based on the doubted SoNA 2014 work.

We see no mention of the importance of 'quiet' areas in the paper. Cities and rural areas should be safeguarded.

Cities (built-up dwellings), should take a fair share of the burden of aircraft noise, and rural 'quiet' areas should not be targeted as this paper and policy suggests. This is one of the main conclusions of the EEA 2016 report 'Quiet Areas in Europe' which explored the extent to which Europe's rural environment is undisturbed by noise pollution.

The above report notes that outside of cities, approx. 18% of Europe can be considered quiet, but 33% remains adversely affected by noise pollution. Noise pollution of quiet areas is strongly related to population density and local transport infrastructure, for example, airports. Rural areas must not be targeted by policy, as is currently the case.

This is very relevant to CAGNE, as Gatwick Airport is surrounded by Areas of Outstanding Natural Beauty and rural communities that Gatwick Airport management, DfT and CAA continue to ignore.

- As a result of CAP 1908, journalists from The Times, and it would seem, the Sunday Telegraph (15.6.20), are writing media stories that are factually incorrect about Gatwick obtaining permission for a second runway. The CAA has not looked to correct these misleading stories, and subsequently causing residents not to trust the CAA's motives again. ^{iv}

CAGNE Committee

i <https://www.thetimes.co.uk/article/demand-for-flights-will-not-recover-until-2023-says-british-airways-owner-iag-bkd53rlb9>

ii https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020003/TR020003-Advice-00040-1-200214_HAL%20Meeting%20Note_FINAL.pdf

iii <https://twitter.com/bakerainlondon/status/1223571893451722752>

iv <http://publicapps.caa.co.uk/docs/33/CAP1908%20Gatwick%20Northern%20Runway%20ACP%20Level%20Decision%20Letter.pdf>

Est Feb 2014

#PledgeToFlyLess

www.cagne.org

cagnegatwick@gmail.com

www.cagnepcforum.org.uk

Twitter @cagne_gatwick

Facebook CAGNE

Instagram @CAGNE