

Email: James Greene at:
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Environment, Transport &
Infrastructure Directorate
Spatial Planning & Policy
Team
Surrey County Council
County Hall
Kingston upon Thames
KT1 2DN

26 June 2020

Dear Sir or Madam,

Record of Surrey County Council's Online Response to CAA Proposed Criteria for Assessing and Accepting the Airspace Change Masterplan CAP 1887

Thank you for consulting Surrey County Council on the proposed Assessment and Acceptance Criteria for the Airspace Change Masterplan CAP 1887. This is an officer response which has been shared with our Cabinet Member for Transport. It has also been submitted via the online questionnaire, and our answers to the questions are included as an Annex to this letter. This emailed letter to you provides us with a record of our response.

Our response reflects Surrey County Council's primary interest to protect the wellbeing of local communities and to ensure that the local impacts of airport operations are minimised, particularly with regard to noise and air pollution. The need for respite from noise for those living under flight paths is an issue that this council consistently promotes in our responses to consultations on aviation related matters. We also seek to oppose frequent aircraft overflights and operations that generate high noise levels in areas previously not overflown. Our position on this is supported by the Government's policy on managing UK airspace and, in our view, should be reflected in the proposed criteria for assessing the forthcoming Masterplan.

Public engagement is of critical importance when airspace change is proposed and local knowledge is a valuable resource that can feed into the process. It is important that the appropriate stakeholder groups are identified and given ample opportunity to meaningfully engage with their communities to ensure that local views are represented in the masterplan process. SASIG is cited in CAP1711b as the representative of local authorities, however it should be noted that this organisation is not representative of all local authorities. Surrey County Council, and other authorities, are not members of SASIG. We anticipate that the county council will be consulted as a separate stakeholder along with other county councils and borough and district councils, as we engage with the communities that we represent on a range of aviation issues that relate to our different functions.

We welcome the requirement for greater alignment between sponsors and the need for the cumulative and overlapping impacts of the various airports' airspace change proposals to be considered. It will be important for communities to fully understand the cumulative impacts on their

local areas. The masterplan will therefore need to present the changes in a non-technical format that is clear and does not require specialist knowledge.

We also welcome the iterative process and the requirement for communities to be involved at iterations two and three. However, it is noted that, following the resolution of any conflicts at iteration three, there is to be no further engagement. Communities adversely impacted by a trade-off, which seeks to resolve an operational issue, incorporated at iteration four will effectively be presented with no opportunity for further discussion. It is therefore considered that an additional iteration, following stage 4, is required to allow for consultation on any modifications to proposed airspace change that are intended to resolve any conflicts.

In the light of the Court of Appeal's recent advice to the Government regarding the Airport National Policy Statement, we trust that due consideration will be given to the wider environmental objectives related to climate change. Similarly, it may potentially be necessary to revisit the modelling data submitted at iteration one, should the coronavirus pandemic have long term impacts on the future demand for air travel. This might potentially impact on the context of criteria relating to the creation of airspace to support aviation growth, although at this stage it is far from clear.

Please contact James Greene with any queries relating to this response by email at planning.consultations@surreycc.gov.uk

Yours sincerely

A handwritten signature in black ink, appearing to read 'James Greene', with a horizontal line underneath.

James Greene
Spatial Planning Officer

Surrey County Council's Online Response to the Proposed Criteria for assessing and accepting the airspace change masterplan

Questions

1. Are you responding in an official capacity on behalf of an organisation?

- Yes – Surrey County Council

2. What is your name?

- Spatial Planning team

3. What is your email address?

- Planning.consultations@surreycc.gov.uk

4. Are you answering as:

- Central or local government body including military

5. Where do you live or where is your organisation based?

- South East

6. Is there anything else that you would like us to know in connection with your response? Record of Surrey County Council's Online Response to CAA Proposed Criteria for Assessing and Accepting the Airspace Change Masterplan CAP 1887

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objectives related to climate change. Similarly, it may potentially be necessary to revisit the modelling data submitted at iteration one, should the coronavirus pandemic have long term impacts on the future demand for air travel. This might potentially impact on the context of criteria relating to the creation of airspace to support aviation growth, although at this stage it is far from clear.

7. Do you consent to your response being published?

Yes (with identifying information)

8. CAP 1887 details the proposed criteria to be used to inform whether to accept the Airspace Change Masterplan, which is being created by the Airspace Change Organising Group (ACOG), an impartial team in NERL. Do you have any general comments you would like to share on the proposed criteria for assessing and accepting the Airspace Change Masterplan?

The Court of Appeal has indicated that the government should reconsider the Airports National Policy Statement (APNS) in the light of the Paris Agreement on climate change. Contextual references to the ANPS relating to the need for increased capacity may therefore have to be revised. Similarly, should the current COVID-19 global pandemic have long term impacts on the demand for air travel, the data that has been used to forecast future trends may also need to be revised.

It would be useful for the masterplan to indicate how the objectives for airspace change in the south of the UK relate to the specific design principles that have been put forward for initial airspace change designs in recent public consultations.

9. Are the proposed criteria detailed in CAP 1887 the right criteria to enable acceptance?

Minor modifications needed.

The definition of environmental “benefits” is limited to noise reduction, improvements in air quality and fuel consumption. Given the need, identified by the Court of Appeal, to revise the ANPS to take account of climate change objectives and internationally legally binding targets for CO2 reduction, it is considered that the scope of the criteria should be broadened.

The Government’s Air Navigation Guidance states that, below 7000ft, noise is a priority for consideration. It is considered that this should be made clear as a criteria, and also a requirement for sponsors to give a good reason if this is not met.

We consider that opportunities for respite should also be included as a criteria, as this is included as an important feature of the government’s proposals within its policy on managing UK airspace. We would also welcome criteria be included which ensure that there are no frequent flights over areas that have not been previously overflown and that guarantee a dedicated flight-free period for those communities that surround airports and those living within recognised noise contours.

The geographical topology of land under flight paths is an issue for residents living in some areas of Surrey that needs to be considered in the Masterplan, particularly along the Greensand Ridge, which extends through Reigate and Redhill exposing some communities to high levels of aircraft noise from flights in and out of Gatwick. Similar issues have occurred in areas in the vicinities of Heathrow and Biggin Hill airports.

10. Chapter 3 of CAP 1887 details the policy considerations that are relevant to the Airspace Change Masterplan. Are there examples of where further policy may be required to guide trade-off decisions?

Yes

Since the Secretary of State for Transport set out the strategic aims for ACOG in his letter dated 4 November 2019, wider environmental issues have become priorities for Government, including internationally legally binding targets for CO2 reduction. It is therefore considered appropriate for the CAA to expand the environmental criteria beyond noise reduction and air quality.

Where there are conflicts between two sponsors requiring trade-offs, it will be important for communities who might be affected to be kept informed and to understand the rationale supporting the outcome of the decision making process. Communities must be engaged meaningfully, through

their representative stakeholder groups, and given the opportunity to respond to decisions included in iteration four of the Masterplan. Transparency and objectivity will be important at this stage of the assessment and decision making process.

11. Chapter 4 of CAP 1887 details the engagement expectations for the Airspace Change Organising Group (ACOG) to undertake. Do you have any comments on the engagement we are asking ACOG to undertake?

It will be important to meaningfully engage the community, through appropriate stakeholder groups, at every stage of this process so that they can properly feed their valuable local knowledge into the decision making process and to ensure that they are fully aware of all the issues involved. It should be made clear to ACOG that consultations need to comprise clear, non-technical explanation of the evidence supporting the decision making process.

It will be important to identify the appropriate stakeholder groups to be involved and to allow sufficient time for them to engage with the communities they represent in the iterations. Engagement should be ongoing – particularly when there are decisions to be made about trade-offs – so that residents' interests are properly safeguarded.

There needs to be further engagement following the resolution of conflicts at iteration three to allow communities to be engaged on trade-offs that might be introduced for operational reasons and yet adversely affect them. They need to have the opportunity to challenge any decision made at iteration four and therefore it is considered that an additional iteration, involving further engagement with stakeholders is required.

It is critical that appropriate representative stakeholder groups are identified and meaningfully engaged. It is noted that in CAP1711b that the list of stakeholder groups includes SASIG as the representative of local authorities, however, SASIG is not a representative group. Surrey County Council is no longer a member of this group. The county council considers itself to be a viable stakeholder that be directly engaged in taking forward the Masterplan for this area.