

**CAA consultation on
Draft Airspace Design Guidance
(CAP 1520 – CAP 1524)**

Responses submitted by email
in addition to an online response

(where permission has been given for publication)

Some personal information has been redacted by the CAA

Campaign to Protect Rural England (CPRE) Hampshire

Communities Against Gatwick Noise and Emissions (CAGNE)
(original and updated responses)

Gatwick Airport Consultative Committee (GATCOM)

Manchester Airports Group

Newcastle International Airport

Teddington Action Group (TAG)

One supplementary response from a resident who preferred to
remain anonymous



President: Earl of Malmesbury
Chairman: Dee Haas
Deputy Director: Nicola Revolta
Aviation Representative: Hugh Sheppard
CPRE N.E. Hampshire District Group

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CAA Consultation: Draft Airspace Design Guidance

Response by CPRE Hampshire

2nd July 2017

Dear Sirs,

This is to be read in conjunction with the online return of which only initial pages have been completed, as also attached (ID: ANON-V5D1-A1KF-3). This is because CPRE Hampshire actively participates on aviation matters with the Aviation Environment Federation through membership and Council Membership of the AEF. Hence the branch has contributed to, and is familiar with, the AEF's responses to this and related consultations.

CPRE Hampshire hereby endorses the response to the **Draft Airspace Design Guidance Consultation from the AEF**; the UK's leading NGO in this field. (ID: ANON-V5D1-AQJ-D). I would also draw attention to a statement by some 40 aviation community groups including the AEF and CPRE Hampshire on 'UK Aviation Policy' of 22nd May 2017, as delivered to 10 Downing Street and to be found here:

www.aef.org.uk/uploads/2017/05/Community-Aircraft-Noise-Statement-May-2017.pdf

This was for the attention of the Prime Minister and the Secretary of State for Transport. While prompted by recent DfT consultations, the content cannot be disassociated from Airspace Design and this current CAA consultation.

Of particular concern has been the complexity of this exercise, so that the typical resources of a CPRE branch such as ours cannot do justice to originating a full response such as those of the AEF or the exceptionally dedicated Gatwick Area Conservation Campaign (GACC).

On 'How to improve the overall process' The AEF has said:

'We found this a daunting document to try to get to grips with not least in terms of its scale. It was unfortunate that the consultation period overlapped significantly with that of major consultations from the DfT, limiting our capacity to devote time and energy to it or to conduct a systematic internal consultation with AEF members (although we did give members the opportunity to share their views with us and directly with the CAA at an all-day workshop focused on airspace and noise issues).

While we appreciate the steps taken to make the guidance accessible in terms of language and a thorough glossary, it is unrealistic in our view to expect community groups to be able to engage thoroughly or effectively with such a long and complex document. Overall, the guidance felt more appropriate for an airspace sponsor's specialist staff members than for members of community groups. While individual sections are therefore comprehensible, the document overall does not, in our view, provide easily comprehensible guidance for community stakeholders on how the system will work and how they can participate in it.'

In responding to this consultation, the GACC noted:

'In our response to the DfT Airspace consultation we said: 'The CAA is described as independent but unfortunately that is not how it is perceived by the public. Despite efforts to give it an environmental role, it is still perceived by many of those aggrieved by new flight paths as mainly concerned to seek the advancement of airlines and airports. That remains so despite the appointment of a chair and a number of Board members from outside the aviation industry. The CAA's priorities are safety, consumers and the promotion of aviation. The CAA website says little about protecting the public from the adverse impacts of aviation. The CAA decision making process is not transparent. Although there is much talk about balancing various factors it is not clear who decides what balance is appropriate. Giving the CAA power to take decisions on all new flight paths not called-in [by the Secretary of State] would mean it being perceived as dictatorial.

When discussing Stage 6 of its 'Seven stages of public agony', the GACC says:

Distrust of the system is increased by the fact that responses are collated and reviewed by the flight path change sponsor ie the airport or NATS (consultation document paragraph 137) –equivalent to giving a criminal the chance to review the prosecution case!

Two paras of the response by a fellow AEF Council Member, Rachael Webb, say so much:

The consultation document is very long and complex, with lots of pre-existing knowledge and cross-referencing required, requiring many redrafts of various responses as I ploughed through the document. Many technical terms and concepts are inadequately explained. It is perhaps the most prohibitively onerous and intimidating consultation I have ever come across.

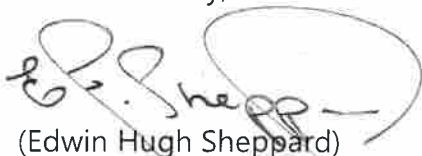
By not asking all questions, previous airspace changes have sneaked through, to the detriment of communities, which is one of many reasons that we now have a trust deficit with the aviation lobby.

Such perceptions of a flawed exercise due to CAA flawed processes have led to suggestions that, in different circumstances, the consultation would be called in. CPRE recognises this is unrealistic, but believes it is just as unrealistic to expect individuals, or those who volunteer to serve on parish council and residents' associations, or with other voluntary groups, to have the knowledge, experience and time to compile a robust, authoritative case to counter the claims of an industry supported by its legal advisers, let alone with Government's overlay that puts the economic case ahead of any other societal cause time after time.

Putting such constraints aside, I have no doubt the CAA would find more rapport with the AEF were it to set itself the task of responding in depth to the Federation's thoughtful, detailed response as outlined in the second para above. Would the CAA kindly consider this?

Please recognise this as a formal endorsement of the AEF consultation response by CPRE Hampshire, while keeping me informed as to the progress of this exercise as if CPRE had responded directly on its own account.

Yours faithfully,



(Edwin Hugh Sheppard)

cc. related and interested parties.

CAGNE Communities Against Gatwick Noise and Emissions

June 2017 Draft CAA Airspace Design Guidance

CAA Consultation – deadline 30th June - airspace.policy@caa.co.uk
<https://consultations.caa.co.uk/policy-development/draft-airspace-design-guidance/>

About you

A What is your name?

Name:

CAGNE - Communities Against Gatwick Noise and Emissions

B What is your email address?

Email:

cagnetatwick@gmail.com

C Where do you live?

South East

D Are you answering this consultation as:

Community Group to the east and west of Gatwick runway for West Sussex and Surrey

E Are you affiliated with any organisation? If so, please enter the name of the organisation here:

Please enter the name of the organisation in the text box:

CPRE Sussex

AEF

AirportWatch

GACC

GATCOM

NMB

ACF

F Is there anything else that you would like us to know about you regarding this consultation?

Yes

Please enter any further details:

We seek a fair and equitable distribution of arrivals and departures to the east and west of Gatwick for West Sussex and Surrey

The consultation and the proposals are to be welcomed but transparency should not be seen as an excuse to push through change that has detrimental impact on communities. Explanation and transparency are to be welcomed but not if they are purely to appease aviation desire for greater efficiency so that more aircraft can use the skies above peoples homes.

G Do you consent for your response to be published?

Yes, with identifying information

CHAPTER 4: How the CAA is considering revising the airspace change process

1 Will the new process gateways improve the airspace change process?

Yes

Please give reasons for your answer.:

CAGNE, formed in February 2014 out of the ADNID PRNAV trial, has since grown to be a major campaign group that opposed Gatwick expansion and seeks a fair and equitable distribution of arrivals and departures in West Sussex and Surrey, from the coast to the airport.

CAGNE concerns itself with all airspace issues created by Gatwick and has been delighted to help communities, MPs, parish and town councils with various aspects of airspace changes since 2014 producing sound, fact based arguments and documents that communities can understand and thus assist them in participating in complex aviation consultations.

Councillor members of CAGNE formed the new CAGNE Aviation Council Forum in 2016 whereby parish and town councils can become members and discuss airspace changes, Gatwick, ask questions about flight routing and have their own dedicated website for them and their parishioners to use. This assists councils and the chair of CAGNE to feed into aviation meetings on airspace changes, the NMB and other national aviation bodies, ensuring that community voices are truly represented alongside industry.

Gatwick's airspace is complex. It is under Heathrow and as well as suffering flight paths over arrivals from the west it has aircraft heading towards holding stacks for both the east and west end of the runway. It also suffers from Farnborough airspace demands. As airports endeavour to grow the impact on those on the ground becomes even greater and with Gatwick's ambition of a 10% growth without a second runway, we have to ensure that community

voices are as loud in the debate as those of aviation with their economic claims.

As well as the Department for Transport seeking a 50% increase in aircraft movements by 2030 with no mention of a 50% decrease in noise.

The seven steps to hell for communities instead of what it could be, a contrastive way to engage whilst placing the same priority on the communities objections/ concerns as those demands of the sponsor/ aviation.

Proposals for Stage 1

2 Should the sponsor engage local stakeholders to agree design principles for the airspace change?

Yes

Please give reasons for your answer:

The sponsor should be accountable at every step of the process. Gatwick Airport operated a trial in February 2014 whereby the consultative committee was not permitted to let residents know of the trial of PRNAV over areas not flown over before. This caused great anger and the threat continues today as Gatwick trial May-June 2017 flying higher sooner, which is causing greater noise over areas not previously flown over. The noise shadow, as explained in CAP 1498, shows that planes higher give a greater cone of noise eg 60%. It is clear that this trial is having this impact whilst vectoring in concentrated manner.

Gatwick management is denying this trial or noise abatement procedures and thus they cannot be trusted, as the impact is clear to communities not previously over flown.

Pg 17 Tie 1a – CAGNE question the statement 'advice on the best noise management techniques'. The management of noise can not be mitigated by any noise abatement procedures or 'respite' and so the sponsor and the CAA should not mislead residents that it can be done especially at Gatwick. Without introducing new flight paths such as ADNID (the trial of February 2014 which subject residents to PRNAV trial over flying rural areas not previously overflowed), using WIZAD NPR, impacting those that already suffering departures and/ or arrivals east and west of the airport – 'one size does not fit all' and the bigger picture must always be addressed when looking at airspace.

Pg 20 67 – 'A minor change to boundaries of high altitude airspace' – this would seem to suggest that this will be of an insignificant impact as was detailed by Gatwick in 2013 with the introduction of PRNAV on all departure routes. As the CAA will be aware it was and is not insignificant and thus we would show concern at this statement by the CAA in the consultation as noise above 7,000ft still has a significant impact on rural areas, areas not use to

aircraft or volume of aircraft routing, eg Cranleigh currently. (pg 22 Level 1 and 2)

CAGNE would seek that all these trials be consulted on before instigation and that they be covered under a Tier that is not currently proposed. The impact of aircraft noise is significant and thus should have been consulted on, communities aware of being guinea pigs, and that compensation for loss of quality of life, tranquility and house value be assessed and offered before the trial was instigated.

We use the example of Cranleigh, Slinfold and Route 1 as Gatwick seek to increase longhaul, that has seen a significant increase in aircraft movements due to destination changes. Currently this type of change operated by ATC would not fall under any Tier and yet this type of change has a significant impact on those below with seemingly no recall upon the industry.

We see that sponsors will be, as currently proposed, unaccountable for such changes to airspace, eg frequency, change in routing within the NPR, flying higher sooner, and so communities will have no recall for the significant impact they have.

We welcome residents in put at the start of any process as long as it is a balanced in put and not selective by the sponsors management as this could be seen as forcing through change that may impact others that are not consulted eg those not currently flown over – outside the NPR or other routes that would be impacted by a sponsor moving traffic from one route to another as suggested by the CAA to Gatwick in the Route 4 review 2017.

Pg 77 'The distinction from Tier 1c (operational trial) should be noted. Tier 1b is used for specific events or operating conditions that require a temporary change, whereas Tier 1c is used for an operational trial of innovative airspace design or of the use of new technologies'.

CAGNE question the wording 'innovative airspace design' in view that this does not necessarily mean a positive for communities eg PRNAV, ADNID, ASCOT trials.

Tier 1c – all trials must have an environmental assessment as well as the desires of the sponsor for 'innovative airspace design'.

(pg 87) All changes to airspace, including Tier 1c, must be full consult upon throughout the process and should the sponsor wish to extend the trial the full database of stakeholders must be consulted again prior to any extension being permitted.

3 What types of data would you find it useful for the sponsor to provide when engaging local stakeholders about design principles? How should this data be presented?

On line and in paper version

Please enter your comments:

A meaningful explanation in simple English to what is to be changed eg use one word instead of 20 to explain. No single line routing on a map as this does not illustrate clearly the noise shadow (CAP 1498) of each route nor the frequency for which they are to be flown eg 56 ATMs per hour.

We welcome the mapping as illustrated in Appendix B but detail that the maps need to show locations on the ground so that residents can find their homes, the frequency and noise levels of different aircraft types as well as day and/ or night impact. The combination of changes to a number of routes close together which could result in the joining of noise cones, and that the line on the map does not represent the noise and cone impact it will have.

Until the noise metrics are changed to illustrate noise events the true impact of any proposed change will not be clear to those being consulted. Residents do not hear aircraft noise as an average.

4 In addition to specific detail, what general background information would you find it useful for the sponsor to provide as context for its proposals?

Please enter your comments:

This process should not become a number game whereby communities that live in built up areas are permitted to use population numbers to force aircraft over rural tranquil areas. Rural communities chose to live away from noise and as such should not have noise forced upon them for this reason. There is an argument to be had that urban lifestyle is far noisier 70dB and as such absorb aircraft noise whereas rural ambient is far lower at 30-35dB. It is recognised that rural areas suffer aircraft noise 10dB higher than urban.

Sponsors should not be permitted to look at individual routes in isolation without taking into account implications for other areas, eg CAA ruling on Route 4 – the proposal to take traffic from Route 4 onto other routes.

5 Overall, will Stage 1 improve the airspace change process?

Please give your reasons and any other views on Stage 1.

We question who are seen as stakeholders as no explanation is provided.

We see the process should be lengthy to ensure that all communities are made aware of proposals so that they may have a say in the process and not just those identified by the sponsor. It should also be that consultation from the outset must go to the widest possible audience and workshops publicised

to ensure that a fair to all process is operated and not just those selected by the sponsor ie councils.

CAGNE welcomes the CAA involvement from the outset but warns of the (pg 19) All meetings between CAA and sponsor – this will build mis-trust as stakeholders are not involved in this process. It will be seen as the CAA and sponsor working together to obtain the sponsors demands for change.

Pg 91 A8 'The CAA will allow the change sponsor to redact certain information from the published versions of the assessment meeting minutes and the Statement of Need:

- material that is confidential in the interests of national security
- material which the CAA has agreed with the change sponsor should not be made public, in order to protect the legitimate commercial interests of a person or business (in the same way that we are obliged to apply the Freedom of Information Act to any information held by the CAA).'

CAGNE strongly disagrees with the above statement. If communities are to endure or be subject to change then they should have full details of why as the majority may not/ will not receive any compensation for any detrimental impact on their home.

With other infrastructure projects residents receive compensation in the true sense of the word. For example HS2 - Homeowners living near tunnelled sections of the route will not be eligible for compensation, but the maximum payment of £22,500 will be made to those living between 120-metres and 180-metres from the centre of the track.

People living closer than 120m have been offered a variety of compensation schemes, including voluntary purchase by the government or, for those who don't want to sell up, 10 per cent of the "pre-blight" value of their property.

For homes between 180m and 240m away, the payment will be £15,000, while for those living from 240m to 300m away, it will drop to £7,500.

What do communities get for accepting intolerable new and/ or increases in aircraft noise?

Pg 28 92 – Communities should be permitted to participate and object to the sponsor statement of need before the lengthy process is undertaken and communities are blighted by the process. This would assist to dismiss any sponsors proposal from the outset so reducing the need for a full consultation costing the CAA, communities and the sponsor financially.

Pg 27 90 – major concerns about allowing the sponsor to interfere with SIDs, NPRs and standard arrival routes is highlighted here as in our case Gatwick can not be trusted as profit comes before communities.

CAGNE site the fact that the Government dismissed Gatwick expansion in favour of Heathrow and yet it wrote in May 2017 to the government requesting that they keep the land until 2030 to build a second runway. This once again blighting communities of Sussex, Surrey and Kent.

There is no true compensation like the Land Act for aviation and the current law of 2021 offers communities no protection from an out of control industry, example provided previously.

Pg 34 etc – CAGNE ask if the 'Appendix' coloured wording will be links to the relevant appendix permitting the reader to flip to the relevant appendix to obtain the pertinent information as understanding the details of the consultation?

Proposals for Stage 2

6 Will introducing the options appraisal we propose improve the airspace change process?

Yes Full

Please provide your reasons:

Pg 19 63 – 'the original need identified by the sponsor as to why a change in airspace design is considered' – this is seen as the sponsor presenting a demand with the CAA approving it before communities are aware of it.

If the CAA seeks to be transparent then this should be in full to ensure transparency but the CAA must not seem to facilitate a way for the sponsor/ government to push through change. If residents do not want change then 'do nothing' must always be an option.

7 Overall, will Stage 2 improve the airspace change process?

Yes

Please give your reasons and any other views on Stage 2.:

The sponsor must make it clear and so publish full details so not to discriminate against the elderly, partially sighted and the blind as well as those that do not have access to the Internet.

'The change sponsor plans its stakeholder consultation and engagement, and prepares consultation documents, including the second-phase 'Full' options appraisal with more rigorous evidence for its chosen option(s).'

CAGNE questions what role communities will have in this stage?

Pg 18 Stage 2

'Initial appraisal of each viable design option will be uploaded by the change sponsor'.

CAGNE would raise the issue that this will inevitably pitch communities (pg 35 1115) each other as Gatwick did with LAMP 2014 with three new departure routes (all similar to the ADNID route trial of February 2014). This will amount to those that shout the loudest or a number game with winners and losers that is totally unacceptable especially as no full compensation is to be given to all that are to be impacted.

In fact no compensation is suggested for such airspace changes unlike with new road or railway lines. We would demand that those impacted by the new route have to receive full house value compensation some 30 miles from the runway from the sponsor. Compensation in the form of insulation or reduced council tax is totally unacceptable, as these communities will have quality of life drastically reduced and house value dramatically impacted especially those in rural areas with little background noise.

Proposals for Stage 3

8 Would an independent third-party facilitator make a sponsor's consultation more effective?

Yes

If so, should a facilitator be a mandatory requirement for certain types of airspace change? Please give your reasons and any other views (including benefits and disbenefits) on facilitators:

Communities must come first when it comes to airspace changes.

The CAA and ICCAN (Pg 17) are not adequate to act as an independent ombudsman. Even at the end of the consultation residents are still not able to fight for no change. The CAA are funded by the industry and seen as encroached into the industry it serves. ICCAN is to be connected to the CAA and has no power and it is not clear who will sit on ICCAN. For communities to raise money for a process legal battle ie a Judicial Review is totally unfeasible for most communities or local authorities. The Secretary of State call to facilitate review of the CAA findings as purposely been set too high for it to be feasible to take place.

ICCAN is to provide feedback during Stage 7 during the post implementation review – this is a major concern as we do not know who will sit on ICCAN, what powers they have, how they will engage with unhappy communities. There are too many question marks over this body to allow CAGNE to support such a group of non elected individuals from unknown backgrounds that have no power over aviation or the process and yet are seemingly the communities only hope of an unbiased ombudsman to take on their issues. Change of airspace cannot be decided upon the word of ICCAN.

The CAA are still endeavouring to play judge and jury in the process and the seven stages of process are seen as a way to avoid a judicial review by communities. It is not the process that will be questioned by the blight that communities are to be impacted by an out of control industry that the CAA serves.

9 Should the CAA publish all consultation responses in full, except to moderate them for unacceptable content?

Please give reasons for your answer:

It is highly unlikely that communities will be able to consumer the full data if all responses are published.

CAGNE welcome the idea of publishing all responses but seriously question the feasibility of such an on line system and that the sponsor will simply employ teams of staff to analysis all responses so that they can prepare to dismiss community concerns or endeavour to mitigate to enable them to force through change to benefit them over the communities.

Pg 42 150 – once again discriminates against a large portion of the population that will be impacted by any airspace change.

Pg 46 168 – ‘not a referendum outcome will not be determined by the relative quantities o the different views expressed’ – CAGNE feels strongly that all concerns must be listened to and taken on board and if the view is ‘change nothing’ then this must be the case whether the sponsor has addressed all points raised in accordance to the CAA or DfT policy.

10 Should the CAA publish airspace change consultation responses as they are submitted, rather than at the end of the consultation period?

No

Please give reasons for your answer:

As above answer to question 9, we see that the sponsor will enedavour to dismiss community responses. Sadly the CAA has already stated that communities will be administers so that the same issues will be categorised and the number of individuals that raise the same issue will be dismissed. (pg 48 174-177)

11 Should consultation responses be made solely through the online portal?

No

Please give reasons for your answer:

As stated before, on line portal, on line consultations, discriminate against a large portion of society that do not have access to computers on a daily basis, elderly, partially sighted or blind. (pg 41 39)

12 Do you think that the consultation process proposed in Stage 3 achieves the right balance between fairness, transparency and proportionality?

No

Please give reasons for your answer:

The principles taken on board by the DfT and the CAA are to adhere to aviation desires and not that of communities for reduced noise. This is just a process by which will be used to force change to benefit aviation and not communities that are impacted, and are to be impacted, by the modernisation of airspace at any price.

13 Overall, will Stage 3 improve the airspace change process?

Yes

Please give your reasons and any other views on Stage 3:

The changes proposed assist compared to previous consultations but they must be of a manageable size, with little jargon, with clear pictures of the ground, land marks, roads, so that residents can see where they live and it must be clear to what the true impact of noise will be ie above 7,000ft is still very noisy in rural areas. And detail to the frequency of flight per routing must be illustrated. Comparisons to day to day life noise must be given ie Hoover, tractor, lorry over your house every 2 minutes.

Proposals for Stage 4

14 Should sponsors be required to adhere to a standard template for their airspace change submissions?

Yes

Please give reasons for your answer:

This would help community groups up and down the country to help those facing a consultation for a first time. It would obviously have to have areas specific to the location, as 'one size does not fit all'.

Those responding must have the freedom to submit additional documentation that will support community questioning by outside employed experts such as acoustics, airspace designers, FOI data, etc.

15 Is it reasonable for the CAA to publish a redacted version of the

submission, with commercially sensitive details removed, as soon as we receive it, before we have assessed it and decided upon it?

No

Please give reasons for your answer.:

If the CAA is seeking transparency then all data must be available to all that are to be impacted by change. Communities must be allowed to have the same data as the CAA.

CAGNE offer the example of the second runway where Gatwick submitted costing's to the Airports Commission but this was removed when it came to release to the public and the press. This did not permit communities and organisations from accessing the feasibility of Gatwick's budgets and thus prevent communities from raising issues over costing's, ie who was to pay for the infrastructure, how Gatwick was position concerning overseas funds, etc.

This puts the communities at a major disadvantage and does not make any consultation fair to all.

16 Overall, will Stage 4 improve the airspace change process?

Yes and No

Please give your reasons and any other views on Stage 4.:

Pg 50 – if the sponsor is permitted to respond to points raised during the consultation this opportunity should also be offered to stakeholders otherwise this is unfair and imbalanced review.

183 - 'from those responses identified for further consideration, the change sponsor considers the merits and practical possibilities of amending the airspace change design, if possible, to address the issues raised in those responses'

'This will include an explanation of why the change sponsor has rejected particular requests, if any. This should create an auditable trail between the responses, options appraisal and modifications'

This would suggest that the sponsor could dismiss community's call to 'do nothing' (pg 36 23)

This stage is very much one-sided in favour of the sponsor.

CAGNE welcome points 185 and 186 that the sponsor would have to re-consult as we are very concerned that routes are viewed in isolation with little, if any, consideration to the big picture or those to be newly overflown or witness increases in aircraft numbers or routings.

CAGNE would re-iterate that the online portal discriminates against a large section of the population that do not have regular or any access to the internet, those with slow broadband, elderly, partially sighted and the blind.

Proposals for Stages 5 and 6 (including Public Evidence Session and Appeal discussions)

17 Will introduction of a new Public Evidence Session improve the airspace change process?

No

Please give reasons for your answer:

As communities are being denied an independent Ombudsman, we would have welcomed the public evidence session and appeal but we now see this as the CAA still playing judge over their jury decisions as it would seem that the CAA that have already approved the consultation, addresses concerns, reviewed the consultation by placing concerns in 'tick boxes' some to be considered and some to be dismissed aided by the sponsor (183).

As stated before ICCAN gives little hope to communities of a body that has power over aviation, the CAA, or being independent and the CAA are not seen as independent.

More details of how this public evidence session and appeal is to be operated needs to be provided before any endorsement from communities can be offered.

Communities do not have the financial resources as the sponsor, NATS, CAA, DfT, to be able to present and fight any decisions and thus experts would have to be employed which would be outside many communities capabilities.

CAGNE would suggest that financial assistance has to be given to any community wishing to go to appeal and that the CAA be removed from this process completely.

18 Is Step 5B (CAA decision) a clear and transparent way of making an airspace change decision?

Yes

Please give reasons for your answer:

It is clear to the role of the CAA but it is still too weighted in favour of aviation over the communities impacted. The CAA are still playing at being judge and jury with communities comments being accessed alongside those of experts employed by the sponsor or interested parties such as NATS.

19 Overall, will Stage 5 improve the airspace change process?

Yes

Please give your reasons and any other views on Stage 5:

The step by step approach makes the process clearly to all but it is still too heavily weighted in favour of pushing through change at the cost to the environment and communities impacted. (pg 62 223)

'Appendix G sets out in more detail the CAA's policy approach in carrying out its duties – including what we understand those duties to mean, **how we evaluate and weigh competing priorities, whether these be strategic policy, environmental impacts such as noise, the needs of airspace users, and/or the interests (economic or otherwise) of airports or air navigation service providers**, and what evidence from stakeholders we will take into account when reaching a decision.'

The communities are instantly at a disadvantage to the aviation industry.

20 What are your views on our proposal not to introduce an appeal against process irregularities into the airspace change process?

Please enter your comments below:

It is totally unacceptable not to have an appeal process in place for communities to turn to as the CAA are party to the process they are not independent and as such should not be the final decision maker in the process.

What is required is an independent ombudsman that treats the concerns of the communities as equal to the demands of the sponsor/ aviation industry.

234 - The call in by the Secretary of State is set too high for communities to be able to use this process. Also a JR is for process and so it is envisaged that the seven stages set by the CAA will enable them to avoid JR action making it almost impossible for communities to appeal and would leave the issue for local authorities and the power of their local MP to take action against the sponsor eg as has been seen with departure route 4 at Gatwick.

What is proposed is not an improvement to the current system for example the CAA PIR review of the departures routes at Gatwick where many communities were ignored due to the averaging of noise metrics, for example Slinfold village. Gatwick offered a departure review but this has now been removed this suggestion with only seeking to fulfill requirements set out in the PIR review, seemingly conducted by one man at the CAA. It is now the intention that these are incorporated in the NMB process which only has CAGNE representing those that suffer arrivals and 3, 4, 1, 7, 8, 2, 9, 5, 6

departures to the east and west of the airport, High Weald some Route 5 and 6 routes to the east and Plane Wrong routes 3 and 4 only.

Proposals for Stage 7 (including Oversight Committee discussion)

21 What types of data would you find it useful for the sponsor to provide, and in what form, when seeking feedback for its post-implementation review?

Please enter your comments below:

What compensation will be forthcoming to the communities impacted ie full house value and cost of moving away due to the new aircraft noise for Tier 1, 2 and 3.

22 Overall, will Stage 7 improve the airspace change process?

No

Please give your reasons and any other views on Stage 7:

Pg 72 250.

'The post-implementation review is not a review of the decision on the airspace change proposal, and neither is it a re-run of the original decision process.'

This passage echoes that communities have no recall on any decision made by the CAA which is unacceptable as the impact, as has been the case with the introduction of PRNAV on all departure routes, was under estimated as prior to implementation Gatwick described the change as 'insignificant' but the change has been found to be significant. If this is repeated communities will have no recall on the sponsor or NATS or the CAA.

23 Overall, will the airspace change process proposed in Chapter 4 achieve the right balance between fairness, transparency and proportionality?

No

Please give reasons for your answer:

It is not fair to take the demands of aviation, the sponsor over those of the communities that will suffer the change, as there is no benefit for them.

24 Should the CAA set up an Oversight Committee?

Yes

Please enter your comments:

Pg 73 256

'Once the change sponsor's data submission is published on the portal, there will be a 28-day window during which any stakeholder may provide any feedback it wants the CAA to take into account when carrying out this review about whether the impacts of the change are those expected, 12 months on. This feedback is submitted using the online portal.²³'

Once again this discriminates against a large proportion of the population and does not allow for communities to truly experience the impact of the change to airspace, for example Gatwick is only full in the summer and so the 12 months should be extended to 2 years.

The oversight committee would be welcomed if it were not just CAA employees judging their own homework but an independent body where the concerns of the communities are judged with the same merits as aviation or sponsors demands. The CAA must be prepared to change any decision they have made on the findings of the independent ombudsman.

Summary of guidance for the proposed process

25 Are there any other areas where the CAA should provide guidance?

Yes

Please give reasons for your answer:

The CAA has to provide guidance in that the sponsor has to provide workshops to clearly explain and answer questions posed by communities or that an independent adviser be assigned to communities to assist them in putting forward their concerns to the changes proposed.

Pg 58 is too restrictive on the communities where as the sponsor would have had teams working and producing evidence to push forward their changes.

The CAA proposal details –

'A series of five-minute slots are available for booking by attendees wishing to speak; representative organisations are able to reserve ten-minute slots
• Those not attending in person will be given the opportunity to submit a written statement using a form on the online portal¹⁸, subject to the following conditions:

- written statements must be limited to fewer than 1000 words
- written statements are limited to one per individual (verified by email address)
- written statements will be moderated by the CAA before publication to remove unacceptable material'

CHAPTER 5: Scaling the airspace change process

26 Does Table 5.1 give sufficient clarity and detail of how the process

will be scaled?

Yes

Please give reasons for your answer:

CAGNE once again details that the call in by the Secretary of State is set too high and the seven CAA stages would probably prevent a JR as this is about process and not about community objections which have already been detailed in the consultation as to be Pg 47 171 – ‘The CAA sees no justification for allowing responses by email direct to the change sponsor or to the CAA rather than using the online portal. We will therefore permit the sponsors to disregard them, as such responses could be equally have been made via the portal.’

It is also clear that the CAA will be administrative in putting community issues into tick boxes 9pg 48 174and 177) and that quantity of objections will be dismissed if they repeat the same issues. This is totally unacceptable behaviour by an industry regulator, as every voice should count when such major life changing issues are being addressed.

27 Do you have (i) any views on the way the Levels are categorised in Table 5.1, (ii) alternative suggestions as to how we might categorise different airspace changes, or (iii) other views about the proposed scaling of the process generally?

Yes

Please enter your comments below:

Not at present but this should be reviewed as the process is put into action as there could be ‘teething’ problems and as such should not be ridgley set in stone at this stage.

28 Do you agree that the number of airspace change proposals put forward to the CAA is likely to increase in the future?

Yes

Please give reasons for your answer:

As the sponsors become greedier and the airspace becomes more concentrated in routings, we foresee the owners of airports and NATS demanding more change and new routings to increase capacity and profits for them.

This is envisaging the rise in low cost leisure budget airlines as they compete for trade offering fairs at unrealistic prices. This sector are heavily subsidised as they do not pay VAT or duty whilst costing the UK in terms of carbon trading and damaging the planet.

CHAPTER 6: CAA duties when carrying out our airspace functions under section 70 of the Transport Act 2000

29 Do you have any views about the CAA's interpretation of section 70 of the Transport Act 2000, as set out in Chapter 6?

Yes

Please enter your comments below:

The CAA places too much emphasis on the travelling consumer and the demands of aviation and sponsors without equal emphasis on the impact aviation has on communities' health, quality of life or home value. The CAA seems to take the stance that aircraft noise can be mitigated, which it cannot.

127 – 'The appraisal should use WebTAG13, the Department for Transport's appraisal method, for health impacts associated with noise, and potentially for other impacts where possible.'

Webtag inclusion of health costs is to be welcomed but the data produced will only be as good as the data submitted. CAGNE raises concerns that the health data will be averaged out, as will the cost to communities, as is the noise metrics currently.

Webtag is a complex process and one community will not stand a chance of understanding unless educated to this process. This link does not simplify this and so it could be seen as data that will not be given the true consideration in the process as it should on the health implications of constant aircraft noise day and night 7 days a week with no respite as is the case currently with Gatwick Airport.

CHAPTER 7: CAA cost recovery for administering the airspace change process

30 Do you have a preference for either of the long-term options for recovering the CAA's airspace change costs that are set out in Chapter 7? Please give your reasons and any other views on how the CAA recovers its airspace change costs.

Yes

Please enter your comments:

Airlines and sponsors should pay for an independent ombudsman, as the CAA is not independent from the industry it serves.

Any additional costs endured by the CAA should be funded by the sponsor/aviation.

31 In the short term the CAA will still have to set up a new statutory charge. On which entity would it be most appropriate to levy this charge? Please give your reasons.

Yes

Please enter your comments:

As detailed above in question 30

CHAPTER 8: Transition to a new process

32 Are our proposed transition arrangements between the old process and the new process reasonable?

Yes

Please provide any further comments or evidence that would inform our proposed transition arrangements:

As long as all stakeholders are fully informed, for example the communities some 30 mile radius of the sponsor

CHAPTER 9: Next steps

33 Are our timescales for introducing the new process reasonable?

Yes

Please give reasons for your answer:

More time must be given to those that do not have access to computers on a daily basis. Also allowance must be made for holiday season such as Christmas, August as many councils/ stakeholders are not available to be consulted and thus may miss the timescales set. For example consultations by Gatwick Airport have always seemingly been conducted over the Christmas and New Year period, which is totally unacceptable to be considered as a well-run consultation for the previous reasons of holidays and councils being closed.

Appendix B: A portal for airspace change proposals

34 Do you agree with the concept of an online portal?

No

Please give reasons for your answer:

It discriminates against a large section of the population that do not has no daily access to the internet, elderly, partially sighted and blind.

35 Should the online portal contain any functionality beyond what we describe or documentation other than that shown in Table B1?

Yes

Please enter your comments below:

This must be re-examined as the process and consultations are run as 'teething' issues of those consulted may be raised and should then be altered.

36 What are your views on locating the sponsor's consultation on a CAA portal where the sponsor administers the documentation and responses?

Please enter your comments below:

The sponsor must pay but must not be able to change any information provided by those being consulted. All responses must be included and the sponsor may not intervene or change this. The CAA has to administer this process otherwise it could be said that the sponsor has too much admin of the process and as such it become mis-trusted as a fair consultation.

37 Is it essential that the online portal is a single website or could different websites (CAA, sponsor, consultation portal) be used for different aspects of the process?

Please give reasons for your answer:

It has to be a website connected to the CAA website so that the consumer can find it. The regulator must administrate the site.

Each sponsor should have a separate page on the CAA system so that the consumer can go to a specific section of the website as they know which airport they are concerned about et Gatwick, Heathrow, Stansted, etc

This can have links to the sponsors website for additional information if necessary.

38 Do you have any views on the CAA's analysis of the three options for an online portal, bearing in mind that the CAA will need to recover its costs through charges on those it regulates?

Yes

Please give reasons for your answer.:

As detailed above and the sponsor / aviation must pay any costs

The process is to discriminate against a large proportion of residents by being an on-line portal whereby disclosure of sponsor's details can be seen and any responses that do not conform to the regimented portal will be dismissed.

Pg 47 171 - "The CAA sees no justification for allowing responses by email direct to the change sponsor or to the CAA rather than using the online portal. We will therefore permit the sponsors to disregard them, as such responses could be equally have been made via the portal."

It is also clear that the CAA will be administrative in putting community issues into tick boxes (pg 48 174 and 177) and that quantity of objections will be dismissed if they repeat the same issues. This is totally unacceptable behaviour by an industry regulator, as every voice should count when such major issues are being addressed.

We are concerned that as the sponsor can read community objections that they will endeavour to remove them as objections by addressing or dismissing them as the process proceeds. (pg 46 166) This is seen as the sponsor being permitted to constantly changing the goal posts.

Appendix D: The impact of the CAA's proposals

39 Is our assessment of the effects of the new process in Table D1 reasonable?

Yes and no

Please enter your comments:

Pg 134

This should be flexible and subject to the results of the Governments 2017 consultation on policy.

40 We are interested in your views on the additional costs in terms of time and resources that the proposed process will create for all parties. We are particularly interested in estimates of the monetary costs and benefits to sponsors of previous airspace changes and how these would have been affected by the CAA's proposed new process.

Please enter your comments below:

This question is targeted at the sponsors of airspace change and clearly illustrates that the CAA still do not recognise that communities will oppose airspace change until full and proper compensation is paid for airspace changes, whether that is directly over a property or in the noise shadow (CAP 1498 60 degree cone).

The environmental impact and noise on communities not previously affected

by aircraft noise must be the number one consideration up to 7,000ft and in a 30 mile radius of the sponsor.

This CAA consultation seems to be facilitating change to avoid Judicial Review, offering communities no hope of impartial rulings by an ombudsman. Communities do not have the resources or finances of the sponsor, the CAA, NATS or the DfT and thus will always be at a disadvantage and these proposals by the CAA do not help this imbalance.

The Government seems fixed on a process that ignores the impact of aviation on communities and so seen as an obstacle to be overcome and the CAA proposal facilitate this aim and that of aviation for uncontrolled growth in a market that is a major pollutant and yet does not pay.

It could be said that the CAA has gone overboard with colour coding and in fact present a daunting document one that may turn the UK citizens away from participating in what are important documents that will impact their lives. The size of document is also a concern as many do not have broadband and this restricts downloading and presents a costly exercise to print the full document. This CAA consultation of 268 pages is seen as an unreasonable size to be comprehended by councils or communities without expertise and knowledge.

The CAA are seemingly seeking to make transparent the process to enable change and still communities have no recall upon an self regulating industry that harms residents quality of life, house value and the environment whilst being heavily subsidised by all through not paying VAT or duty.

End

www.cagne.org

Seeking a fair and equitable distribution of arrivals and departures in the east and west of Gatwick for West Sussex and Surrey
cagnegatwick@gmail.com

Private number 07831 632537 – not to be published

www.facebook.com/gatwickcagne

Twitter [@cagne_gatwick](https://twitter.com/cagne_gatwick)

c/o Warnham Lodge Farm, Mayes Lane, Warnham, West Sussex RH12 3SG – not to be published

CAGNE

Communities Against Gatwick Noise and Emissions

June 2017 Draft CAA Airspace Design Guidance

CAA Consultation – deadline 30th June - airspace.policy@caa.co.uk
<https://consultations.caa.co.uk/policy-development/draft-airspace-design-guidance/>

<https://consultations.caa.co.uk/policy-development/draft-airspace-design-guidance/>

A What is your name?

Name:

CAGNE - Communities Against Gatwick Noise and Emissions

B What is your email address?

Email:

cagnetatwick@gmail.com

C Where do you live?

South East

E Are you affiliated with any organisation? If so, please enter the name of the organisation here:

Please enter the name of the organisation in the text box:

CPRE Sussex

AEF

AirportWatch

GACC

GATCOM

NMB

ACF

F Is there anything else that you would like us to know about you regarding this consultation?

Yes

Please enter any further details:

We seek a fair and equitable distribution of arrivals and departures to the east and west of Gatwick for West Sussex and Surrey

The consultation and the proposals are to be welcomed but transparency should not be seen as an excuse to push through change that has detrimental impact on communities. Explanation and transparency are to be welcomed but not if they are purely to appease aviation desire for greater efficiency so that more aircraft can use the skies above peoples homes.

G Do you consent for your response to be published?

Yes, with identifying information

Questions-

1. Considering the draft guidance overall, to what extent does it meet the following criteria?

One
Two
Three

Please give reasons for your answer.:

CAGNE, formed in February 2014 out of the ADNID PRNAV trial, has since grown to be a major campaign group that opposed Gatwick expansion and seeks a fair and equitable distribution of arrivals and departures in West Sussex and Surrey, from the coast to the airport.

CAGNE concerns itself with all airspace issues created by Gatwick and has been delighted to help communities, MPs, parish and town councils with various aspects of airspace changes since 2014 producing sound, fact based arguments and documents that communities can understand and thus assist them in participating in complex aviation consultations.

Councillor members of CAGNE formed the new CAGNE Aviation Council Forum in 2016 whereby parish and town councils can become members and discuss airspace changes, Gatwick, ask questions about flight routing and have their own dedicated website for them and their parishioners to use. This assists councils and the chair of CAGNE to feed into aviation meetings on airspace changes, the NMB and other national aviation bodies, ensuring that community voices are truly represented alongside industry.

If you answered 2 or 3, how would you improve the draft guidance?

Gatwick's airspace is complex. It is under Heathrow and as well as suffering flight paths over arrivals from the west it has aircraft heading towards holding stacks for both the east and west end of the runway. It also suffers from Farnborough airspace demands. As airports endeavour to grow the impact on

those on the ground becomes even greater and with Gatwick's ambition of a 10% growth without a second runway, we have to ensure that community voices are as loud in the debate as those of aviation with their economic claims.

As well as the Department for Transport seeking a 50% increase in aircraft movements by 2030 with no mention of a 50% decrease in noise.

The seven steps to hell for communities instead of what it could be, a contrastive way to engage whilst placing the same priority on the communities objections/ concerns as those demands of the sponsor/ aviation.

Are there any other general observations you would like to make?

(If your point relates to one of the later questions, we would be grateful if you could raise it in response to that question instead as it will make our analysis easier.)

The sponsor should be accountable at every step of the process. Gatwick Airport operated a trial in February 2014 whereby the consultative committee was not permitted to let residents know of the trial of PRNAV over areas not flown over before. This caused great anger and the threat continues today as Gatwick trial May-June 2017 flying higher sooner, which is causing greater noise over areas not previously flown over. The noise shadow, as explained in CAP 1498, shows that planes higher give a greater cone of noise eg 60%. It is clear that this trial is having this impact whilst vectoring in concentrated manner.

Gatwick management is denying this trial or noise abatement procedures and thus they cannot be trusted, as the impact is clear to communities not previously over flown.

Pg 17 Tie 1a – CAGNE question the statement 'advice on the best noise management techniques'. The management of noise can not be mitigated by any noise abatement procedures or 'respite' and so the sponsor and the CAA should not mislead residents that it can be done especially at Gatwick. Without introducing new flight paths such as ADNID (the trial of February 2014 which subject residents to PRNAV trial over flying rural areas not previously overflowed), using WIZAD NPR, impacting those that already suffering departures and/ or arrivals east and west of the airport – 'one size does not fit all' and the bigger picture must always be addressed when looking at airspace.

Pg 20 67 – 'A minor change to boundaries of high altitude airspace' – this would seem to suggest that this will be of an insignificant impact as was detailed by Gatwick in 2013 with the introduction of PRNAV on all departure routes. As the CAA will be aware it was and is not insignificant and thus we would show concern at this statement by the CAA in the consultation as noise above 7,000ft still has a significant impact on rural areas, areas not use to

aircraft or volume of aircraft routing, eg Cranleigh currently. (pg 22 Level 1 and 2)

CAGNE would seek that all these trials be consulted on before instigation and that they be covered under a Tier that is not currently proposed. The impact of aircraft noise is significant and thus should have been consulted on, communities aware of being guinea pigs, and that compensation for loss of quality of life, tranquility and house value be assessed and offered before the trial was instigated.

We use the example of Cranleigh, Slinfold and Route 1 as Gatwick seek to increase longhaul, that has seen a significant increase in aircraft movements due to destination changes. Currently this type of change operated by ATC would not fall under any Tier and yet this type of change has a significant impact on those below with seemingly no recall upon the industry.

We see that sponsors will be, as currently proposed, unaccountable for such changes to airspace, eg frequency, change in routing within the NPR, flying higher sooner, and so communities will have no recall for the significant impact they have.

We welcome residents in put at the start of any process as long as it is a balanced in put and not selective by the sponsors management as this could be seen as forcing through change that may impact others that are not consulted eg those not currently flown over – outside the NPR or other routes that would be impacted by a sponsor moving traffic from one route to another as suggested by the CAA to Gatwick in the Route 4 review 2017.

Pg 77 'The distinction from Tier 1c (operational trial) should be noted. Tier 1b is used for specific events or operating conditions that require a temporary change, whereas Tier 1c is used for an operational trial of innovative airspace design or of the use of new technologies'.

CAGNE question the wording 'innovative airspace design' in view that this does not necessarily mean a positive for communities eg PRNAV, ADNID, ASCOT trials.

Tier 1c – all trials must have an environmental assessment as well as the desires of the sponsor for 'innovative airspace design'.

(pg 87) All changes to airspace, including Tier 1c, must be full consult upon throughout the process and should the sponsor wish to extend the trial the full database of stakeholders must be consulted again prior to any extension being permitted.

2. Considering Stage 1 (Define) of the process, to what extent does the draft guidance on that stage meet the following criteria?

Three
Two
Three

If you answered 2 or 3, how would you improve the draft guidance?

A meaningful explanation in simple English to what is to be changed eg use one word instead of 20 to explain. No single line routing on a map as this does not illustrate clearly the noise shadow (CAP 1498) of each route nor the frequency for which they are to be flown eg 56 ATMs per hour.

We welcome the mapping as illustrated in Appendix B but detail that the maps need to show locations on the ground so that residents can find their homes, the frequency and noise levels of different aircraft types as well as day and/ or night impact. The combination of changes to a number of routes close together which could result in the joining of noise cones, and that the line on the map does not represent the noise and cone impact it will have.

Until the noise metrics are changed to illustrate noise events the true impact of any proposed change will not be clear to those being consulted. Residents do not hear aircraft noise as an average.

3. Considering Stage 2 (Develop and assess) of the process, to what extent does the draft guidance on that stage meet the following criteria?

The on line only discriminates against a large section of the population, as how are they to be consulted?

This process should not become a number game whereby communities that live in built up areas are permitted to use population numbers to force aircraft over rural tranquil areas. Rural communities chose to live away from noise and as such should not have noise forced upon them for this reason. There is an argument to be had that urban lifestyle is far noisier 70dB and as such absorb aircraft noise whereas rural ambient is far lower at 30-35dB. It is recognised that rural areas suffer aircraft noise 10dB higher than urban.

Sponsors should not be permitted to look at individual routes in isolation without taking into account implications for other areas, eg CAA ruling on Route 4 – the proposal to take traffic from Route 4 onto other routes.

4. Considering Stage 3 (Consult) of the process, to what extent does the draft guidance on that stage meet the following criteria?

Two

Two

Three

We see the process should be lengthy to ensure that all communities are made aware of proposals so that they may have a say in the process and not just those identified by the sponsor. It should also be that consultation from the outset must go to the widest possible audience and workshops publicised to ensure that a fair to all process is operated and not just those selected by the sponsor ie councils.

CAGNE welcomes the CAA involvement from the outset but warns of the (pg 19) All meetings between CAA and sponsor – this will build mis-trust as stakeholders are not involved in this process. It will be seen as the CAA and sponsor working together to obtain the sponsor's demands for change.

Pg 91 A8 'The CAA will allow the change sponsor to redact certain information from the published versions of the assessment meeting minutes and the Statement of Need:

- material that is confidential in the interests of national security
- material which the CAA has agreed with the change sponsor should not be made public, in order to protect the legitimate commercial interests of a person or business (in the same way that we are obliged to apply the Freedom of Information Act to any information held by the CAA).'

If communities are to endure or be subject to change then they should have full details of why as the majority may not/ will not receive any compensation for any detrimental impact on their home.

With other infrastructure projects residents receive compensation in the true sense of the word. For example HS2 - Homeowners living near tunnelled sections of the route will not be eligible for compensation, but the maximum payment of £22,500 will be made to those living between 120-metres and 180-metres from the centre of the track.

People living closer than 120m have been offered a variety of compensation schemes, including voluntary purchase by the government or, for those who don't want to sell up, 10 per cent of the "pre-blight" value of their property.

For homes between 180m and 240m away, the payment will be £15,000, while for those living from 240m to 300m away, it will drop to £7,500.

What do communities get for accepting intolerable new and/ or increases in aircraft noise?

Pg 28 92 – Communities should be permitted to participate and object to the sponsor statement of need before the lengthy process is undertaken and communities are blighted by the process. This would assist to dismiss any sponsor's proposal from the outset so reducing the need for a full consultation costing the CAA, communities and the sponsor financially.

Pg 27 90 – major concerns about allowing the sponsor to interfere with SIDs, NPRs and standard arrival routes is highlighted here as in our case Gatwick can not be trusted as profit comes before communities.

CAGNE site the fact that the Government dismissed Gatwick expansion in favour of Heathrow and yet it wrote in May 2017 to the government requesting that they keep the land until 2030 to build a second runway. This once again blighting communities of Sussex, Surrey and Kent.

There is no true compensation like the Land Act for aviation and the current law of 2021 offers communities no protection from an out of control industry, example provided previously.

Pg 34 etc – CAGNE ask if the 'Appendix' coloured wording will be links to the relevant appendix permitting the reader to flip to the relevant appendix to obtain the pertinent information as understanding the details of the consultation?

5. Considering Stage 4 (Update and submit) of the process, to what extent does the draft guidance on that stage meet the following criteria?

Two

Two

Three

Pg 19 63 – 'the original need identified by the sponsor as to why a change in airspace design is considered' – this is seen as the sponsor presenting a demand with the CAA approving it before communities are aware of it.

If the CAA seeks to be transparent then this should be in full to ensure transparency but the CAA must not seem to facilitate a way for the sponsor/ government to push through change. If residents do not want change then 'do nothing' must always be an option.

The sponsor must make it clear and so publish full details so not to discriminate against the elderly, partially sighted and the blind as well as those that do not have access to the Internet.

'The change sponsor plans its stakeholder consultation and engagement, and prepares consultation documents, including the second-phase 'Full' options appraisal with more rigorous evidence for its chosen option(s).'

CAGNE questions what role communities will have in this stage?

Pg 18 Stage 2

'Initial appraisal of each viable design option will be uploaded by the change sponsor'.

CAGNE would raise the issue that this will inevitably pitch communities (pg 35 1115) each other as Gatwick did with LAMP 2014 with three new departure routes (all similar to the ADNID route trial of February 2014). This will amount to those that shout the loudest or a number game with winners and losers that is totally unacceptable especially as no full compensation is to be given to all that are to be impacted.

In fact no compensation is suggested for such airspace changes unlike with new road or railway lines. We would demand that those impacted by the new route have to receive full house value compensation some 30 miles from the runway from the sponsor. Compensation in the form of insulation or reduced council tax is totally unacceptable, as these communities will have quality of life drastically reduced and house value dramatically impacted especially those in rural areas with little background noise.

6. Considering Stage 5 (Decide) of the process, to what extent does the draft guidance on that stage meet the following criteria?

Three
Three
Three

Communities must come first when it comes to airspace changes.

The CAA and ICCAN (Pg 17) are not adequate to act as an independent ombudsman. Even at the end of the consultation residents are still not able to fight for no change. The CAA are funded by the industry and seen as encroached into the industry it serves. ICCAN is to be connected to the CAA and has no power and it is not clear who will sit on ICCAN. For communities to raise money for a process legal battle ie a Judicial Review is totally unfeasible for most communities or local authorities. The Secretary of State call to facilitate review of the CAA findings as purposely been set too high for it to be feasible to take place.

ICCAN is to provide feedback during Stage 7 during the post implementation review – this is a major concern as we do not know who will sit on ICCAN, what powers they have, how they will engage with unhappy communities. There are too many question marks over this body to allow CAGNE to support such a group of non elected individuals from unknown backgrounds that have no power over aviation or the process and yet are seemingly the communities only hope of an unbiased ombudsman to take on their issues. Change of airspace cannot be decided upon the word of ICCAN.

The CAA are still endeavouring to play judge and jury in the process and the seven stages of process are seen as a way to avoid a judicial review by

communities. It is not the process that will be questioned by the blight that communities are to be impacted by an out of control industry that the CAA serves.

It is highly unlikely that communities will be able to consumer the full data if all responses are published.

CAGNE welcome the idea of publishing all responses but seriously question the feasibility of such an on line system and that the sponsor will simply employ teams of staff to analysis all responses so that they can prepare to dismiss community concerns or endeavour to mitigate to enable them to force through change to benefit them over the communities.

Pg 42 150 – once again discriminates against a large portion of the population that will be impacted by any airspace change.

Pg 46 168 – ‘not a referendum outcome will not be determined by the relative quantities o the different views expressed’ – CAGNE feels strongly that all concerns must be listened to and taken on board and if the view is ‘change nothing’ then this must be the case whether the sponsor has addressed all points raised in accordance to the CAA or DfT policy.

7. Considering Stage 6 (Implement) of the process, to what extent does the draft guidance on that stage meet the following criteria?

Three
Three
Three

We see that the sponsor will enedavour to dismiss community responses. Sadly the CAA has already stated that communities will be administers so that the same issues will be categorised and the number of individuals that raise the same issue will be dismissed. (pg 48 174-177)

The on line portal, on line consultations, discriminate against a large portion of society that do not have access to computers on a daily basis, elderly, partially sighted or blind. (pg 41 39)

The principles taken on board by the DfT and the CAA are to adhere to aviation desires and not that of communities for reduced noise. This is just a process by which will be used to force change to benefit aviation and not communities that are impacted, and are to be impacted, by the modernisation of airspace at any price.

The changes proposed assist compared to previous consultations but they must be of a manageable size, with little jargon, with clear pictures of the ground, land marks, roads, so that residents can see where they live and it must be clear to what the true impact of noise will be ie above 7,000ft is still very noisy in rural areas. And detail to the frequency of flight per routing must

be illustrated. Comparisons to day to day life noise must be given ie Hoover, tractor, lorry over your house every 2 minutes.

Those responding must have the freedom to submit additional documentation that will support community questioning by outside employed experts such as acoustics, airspace designers, FOI data, etc.

8. Considering Stage 7 (Post-implementation review) of the process, to what extent does the draft guidance on that stage meet the following criteria?

Three
Three
Three

If the CAA is seeking transparency then all data must be available to all that are to be impacted by change. Communities must be allowed to have the same data as the CAA.

CAGNE offer the example of the second runway where Gatwick submitted costing's to the Airports Commission but this was removed when it came to release to the public and the press. This did not permit communities and organisations from accessing the feasibility of Gatwick's budgets and thus prevent communities from raising issues over costing's, ie who was to pay for the infrastructure, how Gatwick was position concerning overseas funds, etc.

This puts the communities at a major disadvantage and does not make any consultation fair to all.

Pg 50 – if the sponsor is permitted to respond to points raised during the consultation this opportunity should also be offered to stakeholders otherwise this is unfair and imbalanced review.

183 - 'from those responses identified for further consideration, the change sponsor considers the merits and practical possibilities of amending the airspace change design, if possible, to address the issues raised in those responses'

'This will include an explanation of why the change sponsor has rejected particular requests, if any. This should create an auditable trail between the responses, options appraisal and modifications'

This would suggest that the sponsor could dismiss community's call to 'do nothing' (pg 36 23)

This stage is very much one-sided in favour of the sponsor.

The oversight committee would be welcomed if it were not just CAA

employees judging their own homework but an independent body where the concerns of the communities are judged with the same merits as aviation or sponsors demands. The CAA must be prepared to change any decision they have made on the findings of the independent ombudsman.

CAGNE welcome points 185 and 186 that the sponsor would have to re-consult as we are very concerned that routes are viewed in isolation with little, if any, consideration to the big picture or those to be newly overflowed or witness increases in aircraft numbers or routings.

CAGNE would re-iterate that the online portal discriminates against a large section of the population that do not have regular or any access to the internet, those with slow broadband, elderly, partially sighted and the blind.

As communities are being denied an independent Ombudsman, we would have welcomed the public evidence session and appeal but we now see this as the CAA still playing judge over their jury decisions as it would seem that the CAA that have already approved the consultation, addresses concerns, reviewed the consultation by placing concerns in 'tick boxes' some to be considered and some to be dismissed aided by the sponsor (183).

As stated before ICCAN gives little hope to communities of a body that has power over aviation, the CAA, or being independent and the CAA are not seen as independent.

More details of how this public evidence session and appeal is to be operated needs to be provided before any endorsement from communities can be offered.

Communities do not have the financial resources as the sponsor, NATS, CAA, DfT, to be able to present and fight any decisions and thus experts would have to be employed which would be outside many communities capabilities.

CAGNE would suggest that financial assistance has to be given to any community wishing to go to appeal and that the CAA be removed from this process completely.

9. At certain stages in the process (starting with the development of design principles at Step 1b) the CAA will look for evidence of a two-way conversation to see that the sponsor has adequately engaged stakeholders. In paragraph C9 the CAA describes the evidence that we will look for as "detail of what sponsors have been told by their audiences; how they responded to this feedback; and how it has affected the proposals they are bringing forward". Has the CAA adequately detailed what we would expect to see to know that a two-way conversation has taken place?

No

If not, what else should the CAA request? Please be specific, as we will have to list specific documents in our guidance, so that the sponsor can provide them and we can assess them at the correct gateway.

It is clear to the role of the CAA but it is still too weighted in favour of aviation over the communities impacted. The CAA are still playing at being judge and jury with communities comments being accessed alongside those of experts employed by the sponsor or interested parties such as NATS.

The step by step approach makes the process clearly to all but it is still too heavily weighted in favour of pushing through change at the cost to the environment and communities impacted. (pg 62 223)

'Appendix G sets out in more detail the CAA's policy approach in carrying out its duties – including what we understand those duties to mean, **how we evaluate and weigh competing priorities, whether these be strategic policy, environmental impacts such as noise, the needs of airspace users, and/or the interests (economic or otherwise) of airports or air navigation service providers**, and what evidence from stakeholders we will take into account when reaching a decision.'

The communities are instantly at a disadvantage to the aviation industry.

The CAA has to provide guidance in that the sponsor has to provide workshops to clearly explain and answer questions posed by communities or that an independent adviser be assigned to communities to assist them in putting forward their concerns to the changes proposed.

Pg 58 is too restrictive on the communities where as the sponsor would have had teams working and producing evidence to push forward their changes.

The CAA proposal details –

'A series of five-minute slots are available for booking by attendees wishing to speak; representative organisations are able to reserve ten-minute slots
• Those not attending in person will be given the opportunity to submit a written statement using a form on the online portal¹⁸, subject to the following conditions:

- written statements must be limited to fewer than 1000 words
- written statements are limited to one per individual (verified by email address)
- written statements will be moderated by the CAA before publication to remove unacceptable material'

10. At various points in the process (starting with the development of design principles at Step 1b) the CAA suggests that voluntary use of a third-party facilitator could be useful. Should the CAA be more prescriptive as to how and when a facilitator could be used?

Yes

This CAA consultation seems to be facilitating change to avoid Judicial Review, offering communities no hope of impartial rulings by an ombudsman. Communities do not have the resources or finances of the sponsor, the CAA, NATS or the DfT and thus will always be at a disadvantage and these proposals by the CAA do not help this imbalance.

The Government seems fixed on a process that ignores the impact of aviation on communities and so seen as an obstacle to be overcome and the CAA proposal facilitate this aim and that of aviation for uncontrolled growth in a market that is a major pollutant and yet does not pay.

It could be said that the CAA has gone overboard with colour coding and in fact present a daunting document one that may turn the UK citizens away from participating in what are important documents that will impact their lives. The size of document is also a concern as many do not have broadband and this restricts downloading and presents a costly exercise to print the full document. This CAA consultation of 268 pages is seen as an unreasonable size to be comprehended by councils or communities without expertise and knowledge.

11. Are there any other places in the process at which you feel that a facilitator would be useful?

From the start of the process to the appeal.

12. In paragraphs 177 and C34-C36, and Table C2, we discuss the categorisation of consultation responses. The sponsor is required to sort consultation responses into two categories: i) those responses that have the potential to impact on the proposal because they include new information or ideas that the sponsor believes could lead to an adaptation in a lead design option or a new design option, and ii) those that do not. Is the CAA's explanation of the categorisation exercise and description of the categories sufficient?

No

If not, what additional detail should the CAA add to describe what should happen during this exercise?

It is also clear that the CAA will be administrative in putting community issues into tick boxes 9pg 48 (174 and 177) and that quantity of objections will be dismissed if they repeat the same issues. This is totally unacceptable behaviour by an industry regulator, as every voice should count when such major life changing issues are being addressed.

Pg 73 256

'Once the change sponsor's data submission is published on the portal, there will be a 28-day window during which any stakeholder may provide any feedback it wants the CAA to take into account when carrying out this review about whether the impacts of the change are those expected, 12 months on. This feedback is submitted using the online portal.23'

Once again this discriminates against a large proportion of the population and does not allow for communities to truly experience the impact of the change to airspace, for example Gatwick is only full in the summer and so the 12 months should be extended to 2 years.

Pg 50 – if the sponsor is permitted to respond to points raised during the consultation this opportunity should also be offered to stakeholders otherwise this is unfair and imbalanced review.

183 - 'from those responses identified for further consideration, the change sponsor considers the merits and practical possibilities of amending the airspace change design, if possible, to address the issues raised in those responses'

'This will include an explanation of why the change sponsor has rejected particular requests, if any. This should create an auditable trail between the responses, options appraisal and modifications'

This would suggest that the sponsor could dismiss community's call to 'do nothing' (pg 36 23)

13. In paragraph E25 and E34 the CAA states that methodologies for the various aspects of the options appraisal should be agreed between the CAA and the sponsor at an early stage in the process, on a case-by-case basis. This provides flexibility for different local circumstances. Does this approach strike the right balance between proportionality and consistency?

No

Please provide an explanation as to your response (optional).

We see the process should be lengthy to ensure that all communities are made aware of proposals so that they may have a say in the process and not just those identified by the sponsor. It should also be that consultation from the outset must go to the widest possible audience and workshops publicised to ensure that a fair to all process is operated and not just those selected by the sponsor ie councils.

CAGNE welcomes the CAA involvement from the outset but warns of the (pg 19) All meetings between CAA and sponsor – this will build mis-trust as

stakeholders are not involved in this process. It will be seen as the CAA and sponsor working together to obtain the sponsors demands for change.

14. At each stage in the airspace change process that an options appraisal takes place, the sponsor will be required to submit a safety assessment. The sponsor will be required to provide a plain English summary of the safety assessment and the CAA will provide a plain English summary of its review (i.e. of the Letter of Acceptance, which forms the CAA's review of the safety assessment) when it makes a decision. These documents will be available on the portal. Do you have any views on specific information that should be included and/or excluded from the plain English summary of the sponsor's safety assessment and the CAA's review?

A meaningful explanation in simple English to what is to be changed eg use one word instead of 20 to explain. No single line routing on a map as this does not illustrate clearly the noise shadow (CAP 1498) of each route nor the frequency for which they are to be flown eg 56 ATMs per hour.

We welcome the mapping as illustrated in Appendix B but detail that the maps need to show locations on the ground so that residents can find their homes, the frequency and noise levels of different aircraft types as well as day and/ or night impact. The combination of changes to a number of routes close together which could result in the joining of noise cones, and that the line on the map does not represent the noise and cone impact it will have.

Until the noise metrics are changed to illustrate noise events the true impact of any proposed change will not be clear to those being consulted. Residents do not hear aircraft noise as an average.

If the CAA is seeking transparency then all data must be available to all that are to be impacted by change. Communities must be allowed to have the same data as the CAA which include the commercial reason for the change/ proposal.

CAGNE offer the example of the second runway where Gatwick submitted costing's to the Airports Commission but this was removed when it came to release to the public and the press. This did not permit communities and organisations from accessing the feasibility of Gatwick's budgets and thus prevent communities from raising issues over costing's, ie who was to pay for the infrastructure, how Gatwick was position concerning overseas funds, etc.

This puts the communities at a major disadvantage and does not make any consultation fair to all.

5. Considering Tier 1b changes, to what extent does the draft guidance on temporary airspace changes meet the following criteria?

Two
Two
Three

The sponsor should be accountable at every step of the process. Gatwick Airport operated a trial in February 2014 whereby the consultative committee was not permitted to let residents know of the trial of PRNAV over areas not flown over before. This caused great anger and the threat continues today as Gatwick trial May-June 2017 flying higher sooner, which is causing greater noise over areas not previously flown over. The noise shadow, as explained in CAP 1498, shows that planes higher give a greater cone of noise eg 60%. It is clear that this trial is having this impact whilst vectoring in concentrated manner.

Gatwick management is denying this trial or noise abatement procedures and thus they cannot be trusted, as the impact is clear to communities not previously over flown.

Pg 17 Tie 1a – CAGNE question the statement 'advice on the best noise management techniques'. The management of noise can not be mitigated by any noise abatement procedures or 'respite' and so the sponsor and the CAA should not mislead residents that it can be done especially at Gatwick. Without introducing new flight paths such as ADNID (the trial of February 2014 which subject residents to PRNAV trial over flying rural areas not previously overflown), using WIZAD NPR, impacting those that already suffering departures and/ or arrivals east and west of the airport – 'one size does not fit all' and the bigger picture must always be addressed when looking at airspace.

Pg 20 67 – 'A minor change to boundaries of high altitude airspace' – this would seem to suggest that this will be of an insignificant impact as was detailed by Gatwick in 2013 with the introduction of PRNAV on all departure routes. As the CAA will be aware it was and is not insignificant and thus we would show concern at this statement by the CAA in the consultation as noise above 7,000ft still has a significant impact on rural areas, areas not use to aircraft or volume of aircraft routing, eg Cranleigh currently. (pg 22 Level 1 and 2)

CAGNE would seek that all these trials be consulted on before instigation and that they be covered under a Tier that is not currently proposed. The impact of aircraft noise is significant and thus should have been consulted on, communities aware of being guinea pigs, and that compensation for loss of quality of life, tranquility and house value be assessed and offered before the trial was instigated.

We use the example of Cranleigh, Slinfold and Route 1 as Gatwick seek to increase longhaul, that has seen a significant increase in aircraft movements due to destination changes. Currently this type of change operated by ATC

would not fall under any Tier and yet this type of change has a significant impact on those below with seemingly no recall upon the industry.

We see that sponsors will be, as currently proposed, unaccountable for such changes to airspace, eg frequency, change in routing within the NPR, flying higher sooner, and so communities will have no recall for the significant impact they have.

We welcome residents in put at the start of any process as long as it is a balanced in put and not selective by the sponsors management as this could be seen as forcing through change that may impact others that are not consulted eg those not currently flown over – outside the NPR or other routes that would be impacted by a sponsor moving traffic from one route to another as suggested by the CAA to Gatwick in the Route 4 review 2017.

Pg 77 'The distinction from Tier 1c (operational trial) should be noted. Tier 1b is used for specific events or operating conditions that require a temporary change, whereas Tier 1c is used for an operational trial of innovative airspace design or of the use of new technologies'.

CAGNE question the wording 'innovative airspace design' in view that this does not necessarily mean a positive for communities eg PRNAV, ADNID, ASCOT trials.

Tier 1c – all trials must have an environmental assessment as well as the desires of the sponsor for 'innovative airspace design'.

(pg 87) All changes to airspace, including Tier 1c, must be full consult upon throughout the process and should the sponsor wish to extend the trial the full database of stakeholders must be consulted again prior to any extension being permitted.

16. Considering Tier 1c changes, to what extent does the draft guidance on operational airspace trials meet the following criteria?

Two
Two
Three

Pg 77 'The distinction from Tier 1c (operational trial) should be noted. Tier 1b is used for specific events or operating conditions that require a temporary change, whereas Tier 1c is used for an operational trial of innovative airspace design or of the use of new technologies'.

CAGNE question the wording 'innovative airspace design' in view that this does not necessarily mean a positive for communities eg PRNAV, ADNID, ASCOT trials.

Tier 1c – all trials must have an environmental assessment as well as the

desires of the sponsor for 'innovative airspace design'.

(pg 87) All changes to airspace, including Tier 1c, must be full consult upon throughout the process and should the sponsor wish to extend the trial the full database of stakeholders must be consulted again prior to any extension being permitted.

17. On 21 February 2017 the Government published the Draft Spaceflight Bill. As the foreword to the draft Bill sets out, "This legislation will see the Department for Transport and the Department for Business, Energy and Industrial Strategy, the UK Space Agency, the Civil Aviation Authority and the Health and Safety Executive working together to regulate and oversee commercial spaceflight operations in the UK." Do you have any views on whether this process could be used or adapted to suit future airspace change proposals to enable spaceflights, as anticipated in the Draft Spaceflight Bill?

CAGNE expresses concern at any increase in aircraft/ space movements as they will have impact on communities. We see this process as a starting point that will need updating as industry evolves/ changes as technology allows such travel.

18. The Government proposals talk about a Tier 2 change as one which is likely to alter traffic patterns below 7,000 feet over a populated area and which therefore could have a potential noise impact for those on the ground. The key requirement is that the air navigation service provider must demonstrate that it has assessed the noise impact of the proposed change and engaged with affected communities as appropriate. Which stages of the Tier 1a airspace change process do you think are necessary for a proposal categorised as a Tier 2 change? Please select all those which apply:

All stages

What compensation will be forthcoming to the communities impacted ie full house value and cost of moving away due to the new aircraft noise for Tier 1, 2 and 3.

Any airspace change has a significant impact on communities, Tier 1, 2 and 3. It is immoral for the government to impost such change on communitites without proper compensation for aviation financial gains whether that is directly over a property or in the noise shadow (CAP 1498 60 degree cone). Or, we use the example of Cranleigh, Slinfold, Warnham and Route 1 as Gatwick seek to increase long-haul, that has seen a significant increase in aircraft movements due to destination changes. Currently this type of change operated by ATC would not fall under any Tier and yet this type of change has a significant impact on those below with seemingly no recall upon the industry.

We see that sponsors will be, as currently proposed, unaccountable for such changes to airspace, eg frequency, change in routing within the NPR, flying higher sooner, and so communities will have no recall for the significant impact they have.

The environmental impact and noise on communities not previously affected by aircraft noise must be the number one consideration up to 7,000ft and in a 30 mile radius of the sponsor.

19. The CAA's process for Tier 1a changes is scaled into 'Levels', based on the altitude-based priorities in the Government's Air Navigation Guidance (i.e. where noise impacts are to be prioritised or considered alongside carbon emissions, a more demanding consultation is required). Could the future Tier 2 process also be scaled?

Potentially, as any clarification, breaking down of impact on the communities below must be welcomed alongside compensation for level of impact of noise directly over and as in CAP 1498.

20. Are there any other comments that you would like to make about the CAA's potential Tier 2 process?

Tier 2 and 3 must follow the same process as Tier 1. The sponsor can not be trusted with airspace changes.

Once again this discriminates against a large proportion of the population and does not allow for communities to truly experience the impact of the change to airspace, for example Gatwick is only full in the summer and so the 12 months should be extended to 2 years.

More time must be given to those that do not have access to computers on a daily basis. Also allowance must be made for holiday season such as Christmas, August as many councils/ stakeholders are not available to be consulted and thus may miss the timescales set. For example consultations by Gatwick Airport have always seemingly been conducted over the Christmas and New Year period, which is totally unacceptable to be considered as a well-run consultation for the previous reasons of holidays and councils being closed.

1. To what extent does the draft best practice guidance on Tier 3 changes (other changes that may have a noise impact) meet the following criteria?

Three

Three
Three

If you answered 2 or 3, how would you improve the draft guidance?

The CAA are seemingly seeking to make transparent the process to enable change and still communities have no recall upon an self regulating industry that harms residents quality of life, house value and the environment whilst being heavily subsidised by all through not paying VAT or duty.

What compensation will be forthcoming to the communities impacted ie full house value and cost of moving away due to the new aircraft noise for Tier 1, 2 and 3.

Any airspace change has a significant impact on communities, Tier 1, 2 and 3. It is immoral for the government to impost such change on communities without proper compensation for aviation financial gains whether that is directly over a property or in the noise shadow (CAP 1498 60 degree cone). Or, we use the example of Cranleigh, Slinfold, Warnham and Route 1 as Gatwick seek to increase long-haul, that has seen a significant increase in aircraft movements due to destination changes. Currently this type of change operated by ATC would not fall under any Tier and yet this type of change has a significant impact on those below with seemingly no recall upon the industry.

We see that sponsors will be, as currently proposed, unaccountable for such changes to airspace, eg frequency, change in routing within the NPR, flying higher sooner, and so communities will have no recall for the significant impact they have.

The environmental impact and noise on communities not previously affected by aircraft noise must be the number one consideration up to 7,000ft and in a 30 mile radius of the sponsor.

Tier 3 will have environmental impacts and as such must be consulted upon as with increased frequency comes increased CO2.

22. Where industry does not follow the CAA's guidance in respect of Tier 3 changes, or where there is a clear breakdown of trust between an airport and its stakeholders, is it appropriate for the CAA to publicly draw attention to this?

Yes

If yes, what further detail should the CAA set out in the guidance to reflect this?

They must be made accountable. It is not only the sponsor that is not trusted but also the aviation industry as a whole which includes the CAA, Government and NATS.

This is because profits come before human suffering of noise and devaluation of homes and quality of life.

With out full compensation communities will fight airspace changes as they are not beneficial to them.

If communities are to endure or be subject to change then they should have full details of why as the majority may not/ will not receive any compensation for any detrimental impact on their home.

With other infrastructure projects residents receive compensation in the true sense of the word. For example HS2 - Homeowners living near tunnelled sections of the route will not be eligible for compensation, but the maximum payment of £22,500 will be made to those living between 120-metres and 180-metres from the centre of the track.

People living closer than 120m have been offered a variety of compensation schemes, including voluntary purchase by the government or, for those who don't want to sell up, 10 per cent of the "pre-blight" value of their property.

For homes between 180m and 240m away, the payment will be £15,000, while for those living from 240m to 300m away, it will drop to £7,500.

What do communities get for accepting intolerable new and/ or increases in aircraft noise?

Pg 28 92 – Communities should be permitted to participate and object to the sponsor statement of need before the lengthy process is undertaken and communities are blighted by the process. This would assist to dismiss any sponsors proposal from the outset so reducing the need for a full consultation costing the CAA, communities and the sponsor financially.

Pg 27 90 – major concerns about allowing the sponsor to interfere with SIDs, NPRs and standard arrival routes is highlighted here as in our case Gatwick can not be trusted as profit comes before communities.

CAGNE site the fact that the Government dismissed Gatwick expansion in favour of Heathrow and yet it wrote in May 2017 to the government requesting that they keep the land until 2030 to build a second runway. This once again blighting communities of Sussex, Surrey and Kent.

There is no true compensation like the Land Act for aviation and the current law of 2021 offers communities no protection from an out of control industry, example provided previously.

23. Considering the list of potential information proposed, would you suggest any additions which would help stakeholders, including communities, understand the impacts of Tier 3 changes and enhance transparency?

For these changes to be included in airspace changes. Residents do not want to know why noise has increased due to the increase in frequency of flight or that a destination has become more popular with bucket and spade travellers, they want a return to being not significantly impacted by aircraft above their homes.

It is totally unacceptable not to have an appeal process in place for communities to turn to as the CAA are party to the process they are not independent and as such should not be the final decision maker in the process.

What is required is an independent ombudsman that treats the concerns of the communities as equal to the demands of the sponsor/ aviation industry.

234 - The call in by the Secretary of State is set too high for communities to be able to use this process. Also a JR is for process and so it is envisaged that the seven stages set by the CAA will enable them to avoid JR action making it almost impossible for communities to appeal and would leave the issue for local authorities and the power of their local MP to take action against the sponsor eg as has been seen with departure route 4 at Gatwick.

What is proposed is not an improvement to the current system for example the CAA PIR review of the departures routes at Gatwick where many communities were ignored due to the averaging of noise metrics, for example Slinfold village. Gatwick offered a departure review but this has now been removed this suggestion with only seeking to fulfill requirements set out in the PIR review, seemingly conducted by one man at the CAA. It is now the intention that these are incorporated in the NMB process which only has CAGNE representing those that suffer arrivals and 3, 4, 1, 7, 8, 2, 9, 5, 6 departures to the east and west of the airport, High Weald some Route 5 and 6 routes to the east and Plane Wrong routes 3 and 4 only.

24. In relation to mitigating the impacts of Tier 3 changes, our draft guidance says that the focus should be on exploring the options for mitigating the change through two-way dialogue, because of the local and often incremental nature of Tier 3 changes. Does the guidance need to give more detail?

Yes

The CAA places too much emphasis on the travelling consumer and the demands of aviation and sponsors without equal emphasis on the impact aviation has on communities' health, quality of life or home value. The CAA

seems to take the stance that aircraft noise can be mitigated, which it cannot.

127 – ‘The appraisal should use WebTAG13, the Department for Transport’s appraisal method, for health impacts associated with noise, and potentially for other impacts where possible.’

Webtag inclusion of health costs is to be welcomed but the data produced will only be as good as the data submitted. CAGNE raises concerns that the health data will be averaged out, as will the cost to communities, as is the noise metrics currently.

Webtag is a complex process and one community will not stand a chance of understanding unless educated to this process. This link does not simplify this and so it could be seen as data that will not be given the true consideration in the process as it should on the health implications of constant aircraft noise day and night 7 days a week with no respite as is the case currently with Gatwick Airport.

End

www.cagne.org

*Seeking a fair and equitable distribution of arrivals and departures in the east
and west of Gatwick for West Sussex and Surrey*

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Gatwick Airport Consultative Committee

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If calling ask for
Mrs. Paula Street

30 June, 2017

Dear Sir/Madam,

CAA CONSULTATION ON THE DRAFT AIRSPACE DESIGN GUIDANCE

I refer to the above consultation and GATCOM welcomes the opportunity to comment on the draft Airspace Design Guidance.

GATCOM is the statutory advisory body for Gatwick Airport constituted under the provisions of the Civil Aviation Act 1982. GATCOM brings together a broad and varied range of interests from the local authorities, local community and environmental groups to the aviation industry, passengers and business interests. There are differing views amongst our membership about the detailed nature of the proposed process but the Committee has agreed its response to the consultation which is set out below. I would advise that the environmental and communities groups' representative serving on GATCOM did not agree with every aspect of GATCOM's response below and confirmed that local community groups would submit their own response to the consultation.

In GATCOM's response to the CAA's earlier consultation on the principles for a new process, the early engagement with a range of stakeholders, including local community interests, in the process was very much supported but also highlighted that the proposed process would be more time-consuming. GATCOM is pleased to note the references in the draft Guidance to the role of airport consultative committees in the new process which is welcomed. GATCOM is also pleased to note that while the draft Guidance sets out a very comprehensive and more inclusive approach to seeking permanent airspace changes under Tier 1a, there is a much shortened process for seeking temporary changes and airspace trials. The need to engage with a wide range of interested parties, including local parish councils and community groups, throughout the process will however mean that seeking permanent changes to the notified airspace design will take at least two years to implement changes. It is important therefore that throughout the process parties continue to engage and that opportunities are taken to ensure that estate agents are kept informed of possible changes to airspace affecting properties in their area.

Cont'd ...

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GATCOM also welcomes the opportunity to comment on the principles for Tier 2 airspace changes (changes to air traffic control operational procedures or the planned redistribution of air traffic), should the Government decide to proceed with introducing that new category of airspace change. It is often those types of airspace changes that require a more speedy solution to address local problems suffered by communities. It is felt that the comprehensive process set out for Tier 1a airspace changes may not always be appropriate or proportionate to address a local problem. It is considered therefore that a more flexible approach should be applied. A "one size" approach is not always appropriate to address local circumstances.

GATCOM therefore advocates the principle of adopting a more flexible process with the approach being agreed between all parties at the start of the process so that local circumstances are always at the heart of the process and taken into account and local solutions found in the most expeditious way possible.

Whilst the importance of having a transparent and inclusive process for all types of airspace change is recognised, careful consideration must also be given to ensure that the costs are managed and proportionate. GATCOM is aware that airlines are concerned that the cost of the airspace change will ultimately fall to the airlines through charges by both the airport and the CAA in addition to the cost of amending their on board navigation systems which in turn is likely to be passed to the consumer through increased ticket prices. Allowing a flexible approach will therefore help to manage the cost of running the process.

The GATCOM Chairman and Secretariat was present at the Annual Meeting of UKACCs on 8 June, when the CAA gave an overview of the proposed new guidance and indicated that it would welcome airport consultative committees' specific views on two aspects of the new guidance – the questions that might be used to structure the conversation at the Define Stage and the engagement evidence the CAA needed to validate for a sponsor to pass the Gateway. The GATCOM Steering Group has considered both these aspects.

In respect of questions that might be used to structure the conversation in designing the principles it was felt that in addition to the CAA's suggested questions of:

- Noise and carbon emissions must both be considered between 4,000 and 7,000ft; should one of these be prioritised within that height of airspace for this change?
- Are there noise sensitive buildings that should be avoided, (i.e. hospitals, care homes, schools, higher education establishments)?
- How should the minimisation of overflight, or of night noise, or the difference between multiple respite routes and single routes be traded off against one another?
- If multiple routes are considered in order to provide respite, what might constitute a sufficient period of respite?
- How should the needs of passengers be considered alongside the needs of communities at different times of day?
- Are there areas in which efficiency (shorter or faster routes) take precedence and areas in which other factors should take precedence?
- Are there any areas of tranquility or biodiversity which should be noted?

it is also important to identify at the design principles stage whether a proposed change would result in the overflight of new areas and ways in which that could be avoided? Attention needs to be given to the legacy issue with, wherever possible, priority being given to maintaining existing flight path swathes to avoid subjecting new areas to aircraft overflight.

As regards the engagement evidence the CAA needed to validate for a sponsor to pass through a gateway if the CAA's final guidance allows for a flexible approach to be applied to reflect local circumstances in respect of Tier 2 changes it is important for the change

sponsor to provide evidence to support the approach that has been agreed between all parties so that the CAA can satisfy itself that the approach to be taken has the blessing of all parties.

GATCOM also believes that airport consultative committees (ACCs) have a role in helping to ensure the airspace change sponsor has the evidence needed for submission to the CAA at the gateways sign off. A monitoring role for ACCs throughout the various stages would help to satisfy the ACC's various stakeholders that the airspace change sponsor has met all the requirements of the process agreed at the Design Stage. GATCOM hopes therefore that this potential role can be referenced in the final guidance document.

An important element of the new process is the consultation plan and ensuring that the right areas/local parish councils and local community groups are informed and engaged in the process. As the process is intended to be inclusive it is vitally important that the public has a choice of means to assess the consultation proposals and the response methods rather than the CAA and the airspace change sponsor relying on the on-line portal. As highlighted in GATCOM's previous response, it is accepted that there is a need for consistency and fairness to all parties and use of the on-line portal and response method should be encouraged. However, there is still a vital need to allow exceptions so that written responses via traditional means can be submitted as not all members of the public have internet access or the IT skills to complete the on-line response forms. The consultation plan should therefore ensure that information is available via traditional methods and notification of the airspace change proposals sent by post to all owners/residents likely to be affected before any flight path is moved. All communications must be in Plain English with clear, up-to-date maps showing towns and villages.

Finally, it is noted that in the case of changes with higher potential impacts, the CAA has stated that it may recommend the use by the change sponsor of an independent third-party facilitator to make early engagement with stakeholders on design principles more effective. It is important that this early engagement includes the involvement of affected parish councils and local community interest groups.

I trust GATCOM's views will be taken into consideration.

Yours faithfully,



Paula Street
Assistant Secretary



Manchester Airports Group

Response to the Consultation on Airspace Design Guidance (CAP1520): Supplementary Submission

Manchester Airports Group is the owner and operator of Manchester, London Stansted, East Midlands and Bournemouth Airports. Our experience operating airports both large and small, serving both London and the English regions has given us a strong experience base and means we are well placed to contribute to the Civil Aviation Authority's (CAA) current consultation.

We are pleased to have the opportunity to contribute our view and we have provided a detailed submission using the on-line portal, as requested. In addition to providing a detailed response to the questions posed there are number of broader points which we would wish to emphasise. We believe it will be particularly important that the CAA gives careful consideration to these issues when progressing policy in this important area. They are:

1. There is a strong consensus that the case for modernising airspace structures is compelling and increasingly urgent. It is important that the new process and supporting guidance can be applied in an appropriate way that recognises the difference in scale and complexity between different airspace changes and that the process does not unduly delay the benefits that modernisation can offer to all stakeholders. There is a building concern that the process and supporting guidance could become increasingly burdensome and time consuming.
2. The Guidance addresses each proposal for airspace change separately on its merits. In practice it is likely that different submissions may, of course, be closely interrelated, may require compromise and 'trade-offs', or in extreme cases may even be mutually exclusive. By adopting a simple tactical approach that considers each proposal for change as and when it is submitted without recognising the broader picture, the CAA risks creating a situation where the use of airspace becomes sub-optimal. The Guidance is silent on how the CAA will deal with this important strategic issue.
3. Whilst the Government's broad policy intention is clear, the division of airspace 'changes' into three tiers needs greater clarification and guidance than has been presented to date. There are obvious examples where the boundary between the tiers has not been made sufficiently clear. We have provided examples in our detailed submission. We are particularly concerned that the CAA should not inadvertently introduce a requirement for an additional approval that may, in practice, undermine a legally gained planning consent. In our detailed submission we highlight paragraph 90, which, by way of example, appears to suggest that changes to hours of operation might be classified as a tier 1 change.

-
4. It will be important that the CAA is able to deal with the greater number of airspace changes that will result from the proposed process changes and also with the greater complexity that the new process introduces. We are very concerned by the reference in the guidance (paragraph 45) to the CAA needing to have '*...regard to submissions by other parties*' when confirming the timeline against which decisions will be taken. Any delay may have important business implications for the sponsor and all sponsors must receive equitable treatment for the regulator.
 5. In seeking to engage local communities, particularly in the earlier stages of the process (design principles and options appraisal) it is important that the CAA is pragmatic and recognises the best endeavours of change sponsors. If sponsors consult very widely it is likely that they will engage some local communities who ultimately will be unaffected, potentially causing unnecessary and avoidable uncertainty.
 6. In the earlier stages of the process (design principles and options appraisal) it will be important to establish the range of possible solutions and their broad strengths and weaknesses. We support the CAA's broad objective that the evidence base should build incrementally as the proposed change proceeds through the process. We are though concerned that introducing detailed objective assessment too early in the process will prove disproportionate and may in practice lead to the range of possible solutions being narrowed prematurely.
 7. It is likely that in some cases the consultation stage will draw a large response. As such we do not think that it will be always possible or appropriate to respond to individual consultees. It is clearly important that the themes and suggestions from consultees are captured and considered as part of the process but also that the process can be contained and managed effectively by the sponsor.
 8. The incremental assessment of costs and benefits that is envisaged (paragraph E32) requires the definition of a base, or 'do-nothing' case. In many cases this will be impossible. The most obvious examples are where a change is necessary to meet emerging regulatory requirements, or to respond to system wide changes, such as the 'switch off' of the network of 'VORs'. The suggestion that a 'do minimum' case might be developed instead is glib and inappropriate. The CAA should give a more considered response to this point.
 9. Whilst recognising that further information is required from Government on tier 2 changes and the role of the proposed Independent Commission on Civil Aviation Noise (ICCAN) before guidance can be proposed, it is clearly not ideal that the CAA is consulting on a component part of the guidance without consultees having the benefit of the overall picture. We await further consultation on these important aspects and we would note that we do not support the suggestion (page 17) that the CAA could make further changes '*...without consulting further*'. It will be important for the CAA to consult stakeholders with regard to all changes.

Newcastle International Airport Limited's (NIAL) response to the CAA Consultation on Draft Airspace Design Guidance

Introduction

NIAL welcomes the opportunity to respond to the CAA consultation on Draft Airspace Design Guidance. NIAL is a member of the AOA (Airport Operators Association) and as a regional airport in the North east of England, now attracts more than 5 million passengers a year, generating jobs and wealth for the local economy and providing a link to destinations throughout the world for the leisure and business traveller.

Airspace modernisation will benefit the economy, through shorter flying times and reduced delays because of increased capacity in the skies. There needs to be government leadership on airspace modernisation, decisions need to be balanced and there also needs to be a more strategic approach to airspace design as the current situation rapidly becomes less fit for purpose.

Method

The design guidance set out in CAP 1250 seems to clarify the process well with gateways to be met and easily understood flow charts. For a regional airport an airspace change may involve considerable expense as well as using up other resources. It may also be something that is done on an infrequent basis so experience and expertise may be an issue when the need for airspace change is identified.

Tier 1

NIAL will probably need to go through a Tier 1a airspace change in the near future. The draft guidance in the consultation document is detailed and the seven stage process looks relatively straight forward to follow. However, a considerable amount of guidance would probably be asked for on top of what is already detailed in the draft consultation as airports that may only do this once in a decade and would take a step by step approach. Stage one and the timeline seem particularly important as stakeholders need to be kept informed throughout the whole process and expectations need to be met. The end goal needs to be achievable within reason. The concerning issue for NIAL would be if the proposal was called in by the secretary of state causing major delay but with reasonable and achievable aims this possibility should be negated during the early stages of the process. Examples for Tier 1b and Tier 1c airspace change proposals are also useful in the document as it looks unlikely that NIAL would ever have any need for these types of airspace change.

Tier 1 stages

The seven stages for the tier 1a proposals look straight forward enough but the following comments need to be made. In stage 3 the consultation, there is a gateway to pass at the beginning of consultation after CAA scrutiny, but at the end of stage 3 there should also be a gateway so that the need to consult again after submission would be a rare occurrence. In stage 5 a public evidence session would be held. Are the CAA prepared to travel or will this be generally at one central location? The technical details or minor amendments area in stage 5 is to be welcomed as again NIAL would look to progress issues rather than revert back to an earlier stage in the process. Also as part of the detail on the stage 5 flow chart it says that stakeholders can submit comments via a portal. Is the responsibility to communicate this with the CAA or the airspace change sponsor?

In stage 6, implementation, there just appears to be guidance on how the changes are published with emphasis on communication with the military or other nation states if necessary. Should this stage also include details of any flight validations required in particular circumstances or will this be taken care of on an individual case by case basis. It would be good to know the full requirement for implementation by stage 3 so that resources could be planned for these eventualities. Stage 7 seems a necessary and straightforward enough step to take.

Tier 2

There is little here for tier 2 and this was obviously detailed to a much larger extent in the DfT consultation that NIAL have also given their views on. The comment should be made that this is the most likely type of airspace change that NIAL would propose and the requirements and processes coming from this consultation will be the most relevant for this and probably other airports of a similar size as we are not on the list of airfields that are excluded from Tier 2 airspace change because of our size.

Tier 3

A Tier 3 airspace change looks to be one that NIAL would not undertake, however this does not preclude us looking at this in the future. It may be that we need to establish a new Noise Preferential Departure route and this would be one way of implementing it in a relatively rapid and straightforward basis.

Other comments

Appendix B Environmental metrics and assessment requirements

In paragraph B28 there is a bullet point that states “in the airspace at or above 7000 feet, the CAA should promote the most efficient use of airspace with a view to minimising overall aircraft emissions meaning that mitigating the impact of noise is no longer a priority”

Does this mean that if we wanted to implement an offset hold at FL90 inside our own CAS this would not be the subject of public consultation?

It is also noted at para B40 that “A level 2 change will not alter traffic patterns below 7000 feet” (i.e. the government’s Air navigation Guidance determines that there will be no noise impacts for consideration). Does this mean that approaches designed to mimic current vectoring practices will not need to consider noise impacts?

It is important that any future policy on noise compensation is agreed on a local level and considers the needs of growing regional airports. We have concerns regarding compensation due to increased overflight of aircraft as this could negatively impact on the growth of Airports. We would also like to state that the CAA should be sufficiently resourced to move through the Airspace Change Process in reasonable time and not have to prioritise larger projects.

Conclusion

The most fundamental issue to take forward from this consultation is strategic planning. The UK is a small country with limited airspace yet high volumes of airspace users from commercial air traffic, the military, gliders, GA aircraft, microlight fliers and who knows what the future holds. The plan needs to sort out priorities such as the commercial need for leisure and business travel with the wealth that creates the necessity of military training areas and also the recreational activity of enthusiasts. The priorities should be sorted so that we become much smarter in the way we use this limited amount of space we. Airways could be active only for certain times, military training areas could be kept away from centres of commercial traffic, and recreational aviators could be limited to certain areas again away from major airfields operating on a 24 hour basis. The draft airspace design consultation document sets out the tiers and stages in a good way but there needs to be a more strategic overview at the beginning of the document so that certain proposals cannot be delayed or rejected to on unreasonable grounds.

Metson Trevor

From: Airspace Policy
Sent: 29 June 2017 08:13
To: Metson Trevor
Subject: FW: Consultation response received - Response ID: ANON-V5D1-A1GE-X
Attachments: 170628 TAG RESPONSE TO CAA AIRSPACE CHANGE CONSULTATION.pdf; Annexure A to 170628 TAG RESPONSE TO CAA AIRSPACE CHANGE CONSULTATION.pdf

From: [REDACTED]
Sent: 28 June 2017 22:15
To: Airspace Policy <Airspace.Policy@caa.co.uk>
Subject: Fwd: Consultation response received - Response ID: ANON-V5D1-A1GE-X

Dear Sir/Madam,

I have completed the online response form to submit a response to the consultation from Teddington Action Group (see reference number below) plus the attached PDF copy of my response provided by yourselves. As mentioned in our consultation response, we wish to submit an Annex to our response (Annexure A). This is in a PDF format so we were unable to **attach** it to your online form.

I attach the Annexure A PDF document to this email and I would be grateful if you could confirm that it has been received and will be treated/analysed as part of the Teddington Action Group submission.

Many thanks,

Katie Williams
Teddington Action Group

----- Forwarded message -----

From: **Site Administrator** <caa.co.uk@citizenspace.com>
Date: Wed, Jun 28, 2017 at 9:58 PM
Subject: Consultation response received - Response ID: ANON-V5D1-A1GE-X

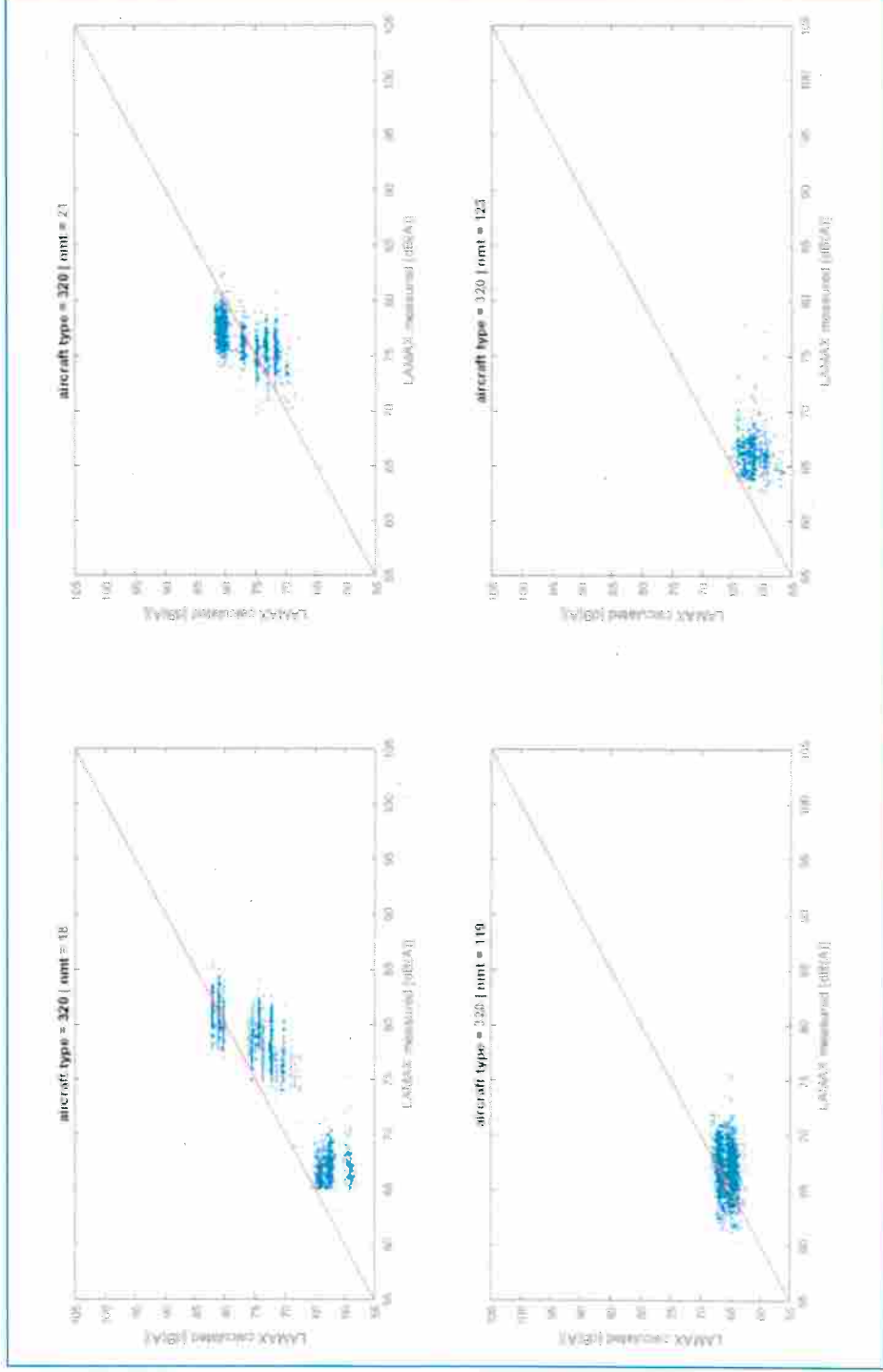
Analysis of data from NLR's 'Verification of Heathrow Noise and Track Keeping Systems'

Using data from reports NLR_HCNF_20160125 and NLR-CR-2016-089 Jan 2016 & July 2016 respectively
Work commissioned by Heathrow Airport Ltd

- This report concludes the highly complex noise models are being applied correctly with good tracking data
- The work presents results from the noise modelling and compares these to real measurements at several locations around Heathrow and several plane types
- This is a very helpful data set not previously available.
- Based on an assessment within 'the right order of magnitude' (p31 & p33) the main report concludes that adequate modelling of the real data is achieved using existing noise models (CAA/ANCON & Anderson Acoustics/INM).
- The follow on questions seem to be now;
 - whether modelling within 'the right of magnitude' will provide good noise metrics (L_{Aeq} , L_{Amax} , N70, N65, N60 etc) and,
 - are there any other features in the data that would impact noise metrics
- This analysis suggests that models are potentially underpredicting noise metrics and further work is required

Consider INM Modelling of 320 type at Several Locations Around Heathrow

Slide 18 from NLR_HCNF_20160125 Verification of Heathrow Noise and Track keeping System - Status update



L_{AMAX} Observations

All locations show L_{AMAX} to be underpredicted at important 60-70dB threshold levels

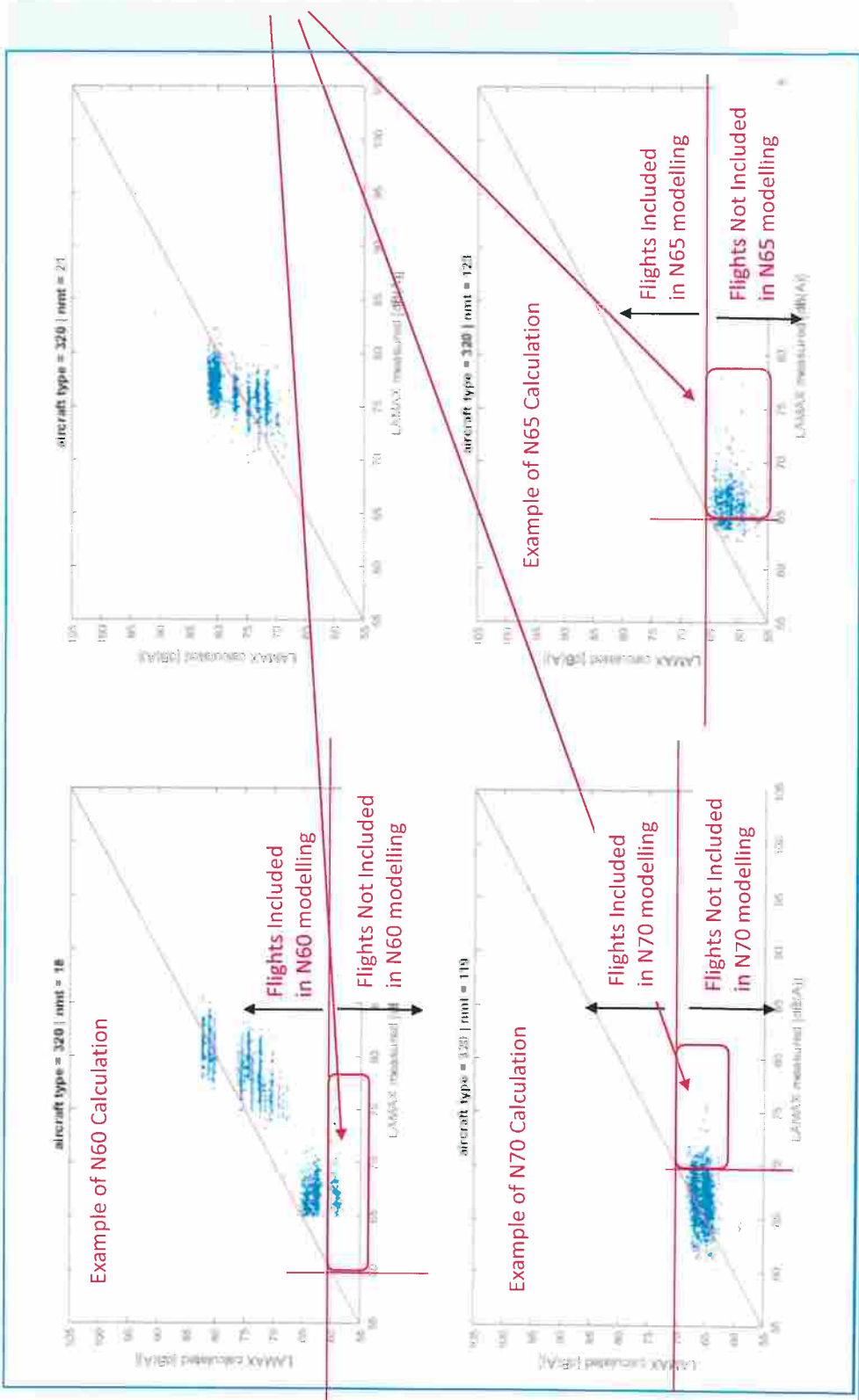
At 80dB and above the INM seems to work well but this is not directly used in Noise metrics

All locations show high spreads

ANCON Modelling results show worse underprediction see Appendix C p47 of main report fig 32

Consider INM Modelling of 320 type at Several Locations Around Heathrow

Slide 18 from NLR_HCNF_20160125 Verification of Heathrow Noise and Track keeping System - Status update



Observation

Many real flights producing over 70, 65 or 60dBA which should be included in N70, N65 or N60 metric are being missed by models. This trend is repeated for different plane types & models.

Implications

- published N70, N65 & N60 metrics underestimate impact of flight noise
- Local residents experience very noisy planes not predicted by the modelling

ANCON Modelling results will give even worse underprediction

Can background Noise Explain all the under-prediction?

- From NLR main report p33 'For the lower levels – Ascot (123) and Barnes (108) - disturbances potentially influence a shift towards higher measured noise levels than calculated.'
- Take Barnes (see main report, similar underprediction as seen at Ascot on previous slide) – this location looks to be away from other noise sources in the wetlands centre
- Consider model prediction at ~63dB (noisy restaurant level, conversation restricted)
- Real measurements are seen at ~73dB (noisy vacuum cleaner, difficult to hold conversation)
- For a background event to explain this underprediction it must be ~72dB (as 63dB+72dB=73dB) and happen at exactly same time as aircraft is passing
- Background noise is unlikely to explain these differences in L_{Amax} given location in Barnes Wetlands centre

Table 1.1 Common Levels of Noise, After Sharland,(1972)

Sound Pressure Level, dB(A)	Typical environment	Average subjective description
140	30m from military aircraft take-off	Intolerable
100	Underground station platform	Very noisy
90	Heavy lorries at 6m	Very noisy
60	Restaurant	Noisy
50	General office	Quiet
20	Background in TV studios	Very quiet

Table 1.2 Guide to decibel addition

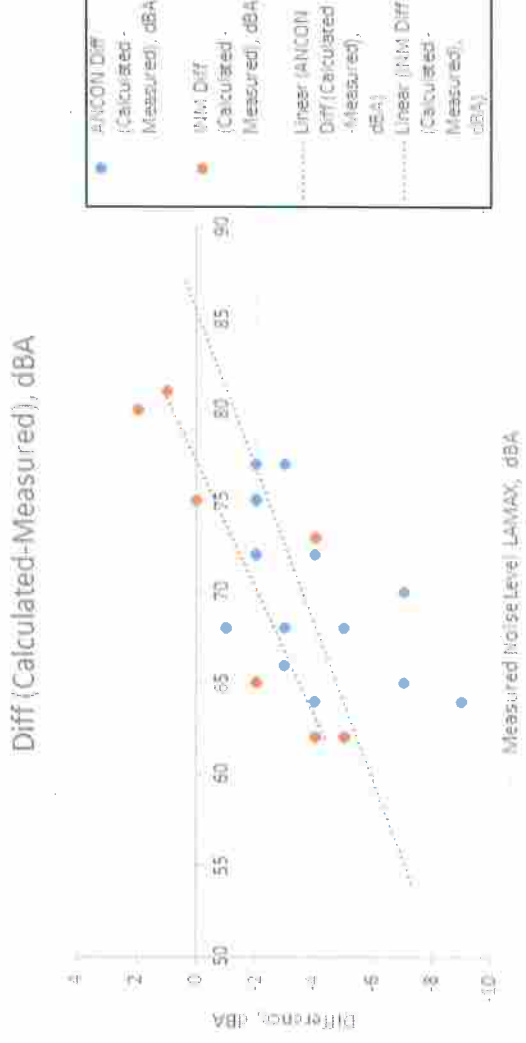
Difference between noise levels, dB	Amount to be added to higher level, dB
0	3.0
1	2.5
2	2.1
3	1.8
4	1.5
5	1.2
10	0.4
15	0.1

As an example, when adding sound pressure levels of 50.0 dB(A) and 55.0 dB(A) together, the difference between them is 5.0 dB(A) and therefore 1.2 dB(A) should be added to the higher value. The resulting sound pressure level would be 56.2 dB(A).

From Jacobs baseline report

Does either ANCON or INM model perform better?

Comparison of L_{AMAX} Results – 320 type aircraft



- Without the full data set a preliminary analysis is presented here for the 320 type data. Centre points of data clouds have been plotted.
- On average both models under predict actual L_{AMAX} noise levels by 2-4dB(A)
- Models work better at higher noise levels, INM giving good predictions
- Both models under predict noise at important cut off levels at 60dB by ~5-6dB(A) and at 70dB(A) by ~2-4dB(A). These are significant in terms of impact metrics.
- The INM model gives closer results by ~2dB(A) but still under predicts at 60dB by ~4dB(A) and 70dB by ~2dB(A)

Conclusions - L_{AMAX}

- This is the first carefully verified data showing detailed modelling results against real results at different locations, it is very informative.
- Data suggests existing models are under predicting noise events at N70 or N65 (day time) and N60 (night time) levels
- Further work is needed to understand why this is happening

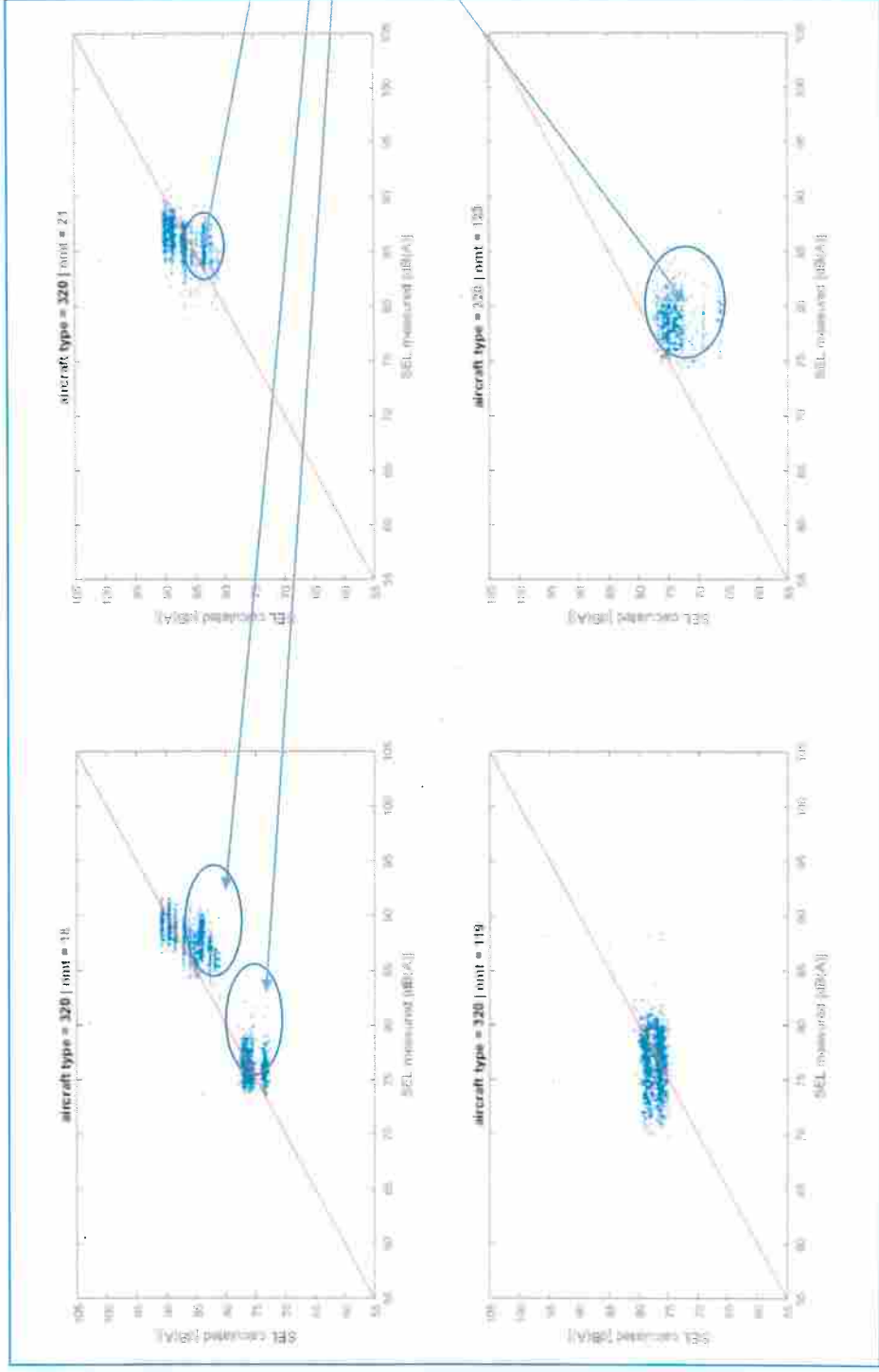
What about SEL's?

(summation of sound energy from a passing aircraft which are used to calculate $L_{Aeq}'s$)

- Given the under prediction of L_{AMAX} do we see the same trends in SEL's i.e. underprediction of noise at threshold levels and wide variation?
- It is worth noting that unlike L_{AMAX} where we are simply counting events for N60/70 metrics SEL's are logarithmic
 - As noted in 6.1.1 of main report p27 'The unit of the above mentioned metrics is A weighted decibels (dB(A)) and is the amount of noise (loudness) expressed on a logarithmic scale. The dB values can therefore not be added directly to each other (two sources of 60 dB do not collectively expose 120dB). Here are some calculation examples of how the logarithmic scale works: $60dB + 60dB = 63dB$, $5dB + 60dB = 67dB$, $10 \times dB \ 60dB = 70dB$, $70dB - 60dB = 69.5dB$ '
- Thus if real SEL's are spread and we use these to get a time weighted average such as L_{Aeq} , the higher noise events will skew the visual average upwards
- This in turn means a single value from a model could under predict the real impact if it is not combined into the average with a suitable distribution function

INM Modelling of 320 type at Several Locations Around Heathrow

From NLR_HCNF_20160125 Verification of Heathrow Noise and Track keeping System - Status update Slide 19



There is evidence that SEL's are being under predicted at both levels of 75dB(A) and higher at 85dB(A)

Under prediction seen at Poyle & Houslow Heath as well as Ascot (Note Ascot SEL's may be influenced by background noise)

What is also evident are significant spreads in all data – spreads of 10-15dB are seen

Implication is that depending on distribution modelling of averages could be a few dB to low

Impact of real distributions

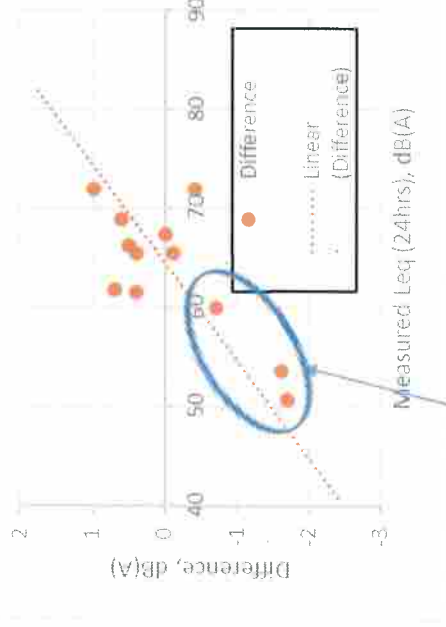
- Consider a distribution of 10-12dB (seen in data)
- These energies 'SELs' will be added together and then divided by time to get a L_{Aeq}
- Model could add 86dB predicted level several times to get an average
- Say in 1 hour 10 modelling events all at same level
 - $86+86+86+86+86+86+86+86+86+86 = 60\text{dB } L_{Aeq}$
- However real data is actually spread from 80dB to 92dB
- So real events in 1 hour actually more like
 - $80+82+84+86+86+86+86+88+90+92 = 62\text{dB } L_{Aeq}$
- The same would apply for 16hr calculations
- The data in the NLR report suggests the ANCON model has wider spreads than the INM model and so would need a different distribution factor to be applied
- What distributions are being used in summations of SEL's to get L_{Aeq} ?



Do any other reports concur with this implication?

ERCDC REPORT 0306 Noise Mapping – Aircraft Traffic Noise A research study on aircraft noise mapping at Heathrow Airport conducted on behalf of DEFRA Feb 2004 Table 4.4.1 p31

Westerly Ops, Leq (24hrs) dB(A)		
Measured	Pred	Diff,
66.2	66.7	0.5
61.5	61.9	0.4
61.8	62.5	0.7
65.4	65.8	0.4
67.4	67.4	0
68.9	69.5	0.6
65.5	65.4	-0.1
71.9	72.9	1
71.9	71.5	-0.4
60	59.3	-0.7
53.7	52.1	-1.6
50.8	49.1	-1.7



- Very little data available to cross reference
- However one previous report using the ANCON model also suggests models may not work as well at threshold levels of L_{Aeq} 50-60 dB(A) which agrees with trends seen in this analysis – with 1-2dB corrections required
- This is not uncertainty it will be a systematic error, under predicting noise levels

Conclusions – L_{AMAX} , SEL's and L_{Aeq}

- This is the first carefully verified and independent data showing detailed modelling results against real results at different locations, it is very informative.
- Data suggests existing models are under predicting noise events at N70 & N65 (day time) and N60 (night time) levels
- Further work is needed to understand why this is happening
- A reason why L_{Aeq} may be systematically under estimated has been identified
- Unlike a single noise event where 3dB is just perceptible to the human ear, a 3dB in a L_{Aeq} 16hr result would be equivalent to a doubling of noise events so small differences are significant
- Assumptions around real distributions used to calculate L_{Aeq} need to clearly stated

Metson Trevor

From: [REDACTED]
Sent: 28 June 2017 09:29
To: Metson Trevor
Subject: Re: Response 32475328

Dear Mr Metson,

[REDACTED]

The subject response covers the increased noise pollution from aircraft approaching Luton airport low over populated areas.
The Luton TRAVIS system (which is publicly available) demonstrates the issue since the expansion of this airport in 2015 and could be reviewed to highlight this issue.

[REDACTED]

Yours Sincerely

[REDACTED]