

**SSE response to CAA consultation CAP 1934**  
(via CAA portal online survey)

**Question A. Are you responding in an official capacity on behalf of an organisation?**

Yes. Stop Stansted Expansion

**Question B. What is your name?**

Sarah Cousins

**Question C. What is your email address?**

info@stopstanstedexpansion.com

**Question D. Answering as?**

Local organisation e.g. community action group

**Question E. Where do you live or where is your organisation based?**

East of England

**Question F. Is there anything else that you would like us to know about you in connection with your response?**

Stop Stansted Expansion ('SSE') was established in 2002 in response to Government proposals for major expansion at Stansted Airport. We have some 7,500 members and registered online supporters including 150 parish and town councils and local residents' groups and national and local environmental organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.

**Question G. Do you consent to your response being published?**

Yes, with personal identifying information (name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

**Question 1. Do you have any general comments about our proposed new procedure?**

SSE welcomes the opportunity to respond to the Civil Aviation Authority's ('CAA') proposed regulatory procedure for a new function to review airspace classifications and to amend them where appropriate.

SSE supports this new function from the standpoint that the principle of improvements to the use of airspace should reduce the environmental harms and adverse health impacts for people living around airports and under flight paths and increase the airspace efficiency for all airspace users.

It should be a pre-requisite that any airspace classification change should reduce aircraft noise impacts on local communities,

However there appears to be insufficient protection for local communities against the potential adverse noise impacts of airspace re-classification. This concern is heightened by paragraph 2.13 which states "*the Secretary of State stated that the CAA should consider the environmental consequences of a proposal we make for amending the classification of airspace, but he also specifically **disapplied** [our emphasis] the existing Air Navigation Guidance*". We do not agree that the environmental consequences can be summarily dismissed without being assessed.

Whilst we note that, in paragraph 2.34, communities affected by aviation noise will be stakeholders in the procedure, there are insufficient community environmental safeguards. For instance, the CAA says “*we do not anticipate that this procedure will be used for any change that causes measurable environmental impacts, such as changes to departure and arrival routes at aerodromes*”. Firstly “*measurable environmental impacts*” are not quantified and secondly it appears that the CAA is to be the sole arbiter in this matter. As minimum safeguards, we wish to see:

- (i) the Independent Commission on Civil Aviation Noise (‘ICCAN’) having a formal role in advising on noise issues and endorsing the CAA’s judgement that a classification change would not cause measurable noise impacts.
- (ii) consultation on the criteria for this test in terms of levels of noise, frequency of noise events, noise characteristics and background noise levels.
- (iii) ICCAN’s formal agreement to these criteria.

Furthermore, the CAA advises that at the Review Stage of the proposed process in paragraph 3.2 “*We consult organisations in the Airspace Modernisation Strategy governance structure that represent airspace users*”. This appears to exclude community interests and any public consultation. We wish to see local communities engaged in the review and fully consulted.

Paragraph 6.49 states “*Should we be able to identify any impacts on specific communities, our strategy will address who needs to be contacted. An option may be to use the airfield consultative committee, or its local noise management body*”. The option to use the airfield’s consultative committees (‘ACCs’) is inadequate representation for local communities who need to be fully engaged. Moreover, ACCs are often seen as little more than an extension of the airport operator’s PR Department and are not trusted by local communities.

Paragraph 6.21 states “*in the absence of environmental guidance from the Secretary of State, the CAA has had to determine its own environmental objectives when making decisions under this procedure. We will do so with reference to background government policy, including but not limited to, the Climate Change Act 2008, the Aviation Policy Framework 2013 and the Noise Policy Statement for England 2010. We conclude that applying those background documents to determine our own environmental objectives will lead to the same environmental objectives as are set out in the Air Navigation Guidance*”. The extant Aviation Policy Framework (March 2013) is outdated and although the Government launched a consultation on a new aviation strategy more than three years ago (‘Beyond the horizon, the future of UK aviation’, July 2017) we are still awaiting publication of the new policy framework, including for aviation noise. This policy vacuum is further exacerbated by the lack of Government guidance following the publication of the World Health Organisation’s Environmental Noise Guidelines for the European Region in October 2018 which lowered the recommended source specific noise limits for aviation. This is a major flaw in the proposed procedure which, whilst it is recognised as being outside the remit of the CAA, nonetheless contributes to the concerns of local communities of a lack of adequate protection against noise harms.

Finally SSE has long maintained that there needs to be better coordination between land planning and airspace planning and that the long term stability of routes is an important airspace planning criterion. People and communities make important long-term decisions based on location. Changes to airspace classification and use can have a significant impact on the quality of life and property values of those overflown. We would like to see this important aspect recognised in the procedure. Furthermore, where lower airspace can be released from aviation use, such as in sensitive locations or to restore tranquillity at Sites of Special Scientific Interest, this should be included in the procedure by setting appropriate criteria such as minimum heights.

**Question 2. Do you have any comments about our proposed approach for the Consider stage?**

Some modifications needed.

See our answer to Question 1 above

**Question 3. Do you have any comments about our proposed approach for the Review stage?**

Significant modifications needed

See our answer to Question 1 above

**Question 4. Do you have any comments about our proposed approach for the Amend stage?**

Significant modifications needed

See our answer to Question 1 above

**Question 5. Please can you quantify the cost impacts of the new procedure on your organisation, or more broadly if possible, and how we might best minimise these?**

Where re-classification might have an impact on communities, the government or the aviation industry should fund the provision of appropriate advice to enable communities to understand the implications of the change and engage in the process.

Where re-classification could have a detrimental impact on property values, this should be professionally quantified in advance and taken into account by the CAA when weighing up the benefits and disbenefits of re-classification. The CAA should also support efforts to amend the Land Compensation Act 1973 to provide for compensation to homeowners where their properties have been devalued as a consequence of airspace changes.