

CAGNE

Communities Against Gatwick Noise and Emissions

umbrella community group for Sussex and Surrey

10th April 2019

The CAGNE response to the Government Aviation Green Paper
Deadline 11th April 2019

The Future of UK Aviation

Introduction

CAGNE was created on the 17th February 2014 due to the ADNID trial departure route being instigated by Gatwick Airport for a PRNAV route (concentrated flight path) over rural areas not previously flown over.

CAGNE has grown and diversified since as an umbrella community group to embrace the many issues that Gatwick presents through its desire for growth including new flight paths, changes to flight paths and increases in noise. CAGNE is a major campaigning/lobbying force opposing the second and third runway for environmental reasons.

CAGNE has an extensive network of members covering areas to the east, west, north and south, in rural and urban areas, around the airport and is concerned with the totality of aircraft noise produced by arrivals and departures, environmental issues, airspace and surface access for Sussex, Surrey and beyond.

The CAGNE committee consists of volunteers/residents to the east and west of the airport coming from many professional backgrounds including aviation.

An Annual General Meeting open to the public takes place each year in February where the chair and committee are elected.

CAGNE sends out informative newsletters to members, consults its members to formalise responses, and is active on social media – Facebook, twitter and instagram.

CAGNE also operates an independent forum (www.cagnepcforum.org.uk) to engage and consult with town and parish councils called the CAGNE Town and Parish Council Aviation Forum. This is for councils and is run by councillors.

CAGNE is not just concerned with Gatwick Airport, but all airspace and gets involved with other airports in the UK and overseas; challenging the environmental damage aviation has on climate change and air quality worldwide.

We work closely with CPRE Sussex and Surrey and other CPRE offices as well as other bodies such as SE Climate Alliance, Airport Watch, Aviation Environment Federation, Members of Parliament, local authorities and other aviation community groups in the UK and overseas. CAGNE has a seat on the Gatwick run Noise Management Board and attends GATCOM.

Key points of concern in response to the Aviation Green Paper:

1. CAGNE strongly objects to a sponsor/ airport being given any great powers in the implementation of growth and changes to airspace through Future Airspace Strategy for modernization of airspace. The Gatwick Airport Noise Management Board has clearly illustrated that airport management do not facilitate a fair or balanced view concerning aircraft noise and those impacted or to be impacted by it. Airports cannot be trusted. A stringent policy and accountability must be put in place.
2. CAGNE is mostly concerned with Gatwick Airport. As such we already have reason to question how Gatwick management is conducting CAP1616 and the lack of governance the CAA is imposing on the process to ensure a balance between industry and communities impacted.
3. The government should reconsider enforcing a night ban at all airports for a period of 7 hours
4. Environmental impact must be controlled by government and not left to individual airports. Collectively growth of airports through Master Plans will breach climate change targets for the UK. This must be controlled by elected members. The government has to safeguard the UK.
5. The government must enforce investment in quieter planes as well as alternative fuel to fossil fuel. Aviation must be capped to ensure CO2 is reduced.
6. The government must be held to account on aviation policy, the law of 1920/ 1921 that prevents legal action being taken against aviation should be reviewed.
7. The government continues to ignore the difference in ambient noise between rural and urban areas and the impact overflight has.

ICCAN must be given statutory powers to bring airports to account and act as an ombudsman to protect communities from airport growth. The CAA is seen as obedient to the aviation industry

8. Communities must come before aviation profits and the consumers desire to use airplanes as buses. It is the government's role to enforce a reduction in carbon and damage to the planet for future generations, just as they are with the recycling of plastics.

9. The polluter must pay. Aviation paying VAT and duty would be in line with other industries and the consumer that chooses to fly must pay the true cost of flying.

Key points of concern in detail:

1. The Gatwick Airport Noise Management Board is a clear illustration of how Gatwick can not be allowed to control noise issues as it has spent three years in reviewing arrivals for those furthest from the runway without any work on the severity of noise suffered by communities closest to the runway with multiple routes and no respite.

Gatwick Airport has operated its Noise Management Board for the past 3 years and has not met its Terms of Reference 25 for a geographical spread of representation. The result is that any decisions made during this time are deemed to be unsafe. The Gatwick Airport appointed management of the NMB has allowed community representation to be dominated by groups concerned only with singular airspace issues in specific geographical locations.

The Gatwick Airport Arrival Review was also biased in favour of those impacted by arriving aircraft furthest from the runway to the detriment of others. Gatwick refused to take into account the totality of airspace as a consideration or the ramifications of recommendations that would impact other communities with greater severity eg IMM11 and moving the join from 10nm to 8nm on the ILS without consulting those residents that already suffered multiple routings of arrivals and departures with no respite.

2. Gatwick Airport management has selected to engage the Noise Management Board community groups in the first stage of CAP1616 FAS-IS but not parish and town councils. The NMB has operated for the past 3 years not meeting its Terms of Reference 25 of geographical spread. A point made to Gatwick many times but ignored by the NMB management.

These community groups have not been required to provide details of whom they represent, their constitution, membership, etc as detailed in the NMB membership ToR currently –

‘Community Noise Groups

*Community Noise Groups at the NMB are organised community interest groups that are usually established to protest about the effects of aircraft noise. These groups reflect the views of particular local communities. **The geographical extent of their area of interest and particulars of their membership is not normally defined in detail.** Some groups include elected Parish Councillors in their membership. Several of these groups use dedicated websites and make use of social media to publish information to support of their particular cause, and in some cases to set out their objectives.’*

Gatwick has cherry picked who they engage with at stage one leaving residents impacted by new aircraft noise vulnerable and totally unaware of the process as well as:

- The timing has not given elected members of parliament, County and District councils enough time to engage with parish councils or residents.

District and parish councils are undertaking elections during the set sponsors timescale and as such their input is limited. There is not one parish meeting before the deadline set by Gatwick Airport of 5th April as only 3 weeks of engagement has been permitted. The last workshop being of restrict attendance on 1st April gave no time for councils/ council officers to provide an informed response.

- Members of Parliament are engaged in the complexities of Brexit during this engagement period, so are unlikely to give due time to this complex subject.
- The document provided by Gatwick does not meet your criteria of engagement C2 'clear information about what is proposed and the potential impact of the changes on them.' This is particularly evident in the sponsor's questions 3, 4, 5, 7, 8, 12 where they propose to fly over new people and install concentrated routes. None of this is explained. This will leave the process open to a judicial review.
- The CAP1616 process of consultation and engagement asks 'how has the audience been identified?'

CAGNE feels Gatwick has manipulated stage one. It is unsafe to allow this stage to move forward when details being submitted are not drawn from an informed basis or geographical spread of Gatwick Airports current impact or potential impacts (vulnerable unsuspecting communities). There was a clear illustration of lack of time being allowed, consideration, detail of ramification of what is proposed by the sponsor, and an unsound engagement process as set in motion by the sponsor, Gatwick Airport. The CAA has to date declined to ensure stage one is carried out in accordance with C2 of CAP1616.

3. The Government should consider a night ban for all airports to allow 7 hours of undisturbed sleep (WHO 2018 report recommendation) without increasing movements on the shoulder periods. The following should be key considerations to enforce a mandatory night ban at all airports:
 - The impact on health
 - The cost of night flights to the NHS on education and the work place.
 - Are night flights essential to the UK economy or solely to benefit airlines profits?
4. The government appears to wish to distance itself from any regulatory role of the aviation industry, preferring to allow the industry carte blanche, with damaging endless unsustainable growth.

Policy proposals would appear to suggest that everything and anything in relation to the continued growth of aviation could be managed and mitigated. This is unrealistic. The profitability of aviation is predominantly for the benefit of foreign investors.

The government suggested a clearer framework to allow for further regional expansion in addition to the third runway at Heathrow. Gatwick and Bristol airports are a prime example of this through their proposed Master Plans 'making best use of current facilities' (Beyond the Horizon April 2018). This is allowing for expansion through the backdoor without public or parliamentary scrutiny.

Airline operators have stated that there is already over capacity in the market and thus airlines are failing. This specifically goes against the government's predictions in the green paper for leisure growth.

5. The promise of larger planes being flown to reduce CO2 resulting in the number of movements by smaller planes being reduced is not occurring, thus the potential CO2 saving is not reality. In fact increases in smaller planes are being operated making the carbon footprint of the lanes and its passengers greater than anticipated. The increase in new planes in the sky disbands any CO2 saving made through new technology.

Carbon trading is unrealistic as illustrated by airlines that have tried with the planting of forestry, only to have it cut down by natives.

Low cost airlines must be outlawed if we are serious about investment in cleaning airspace and reducing each airports carbon footprint – the polluter must pay.

For Gatwick Airport to declare they are carbon neutral is unreasonable as this only applies to the airport itself and ignores the pollution from planes flown to and from the airport, the carbon it uses for leisure travel (some 89% of flights) and lack of an alternative fuel to fossil fuel.

6. The government must be held to account over aviation. The law of 1921 that prevents legal action being taken against aviation should be reviewed.
7. ICCAN is an unknown quantity and we do not know if it will have statutory powers or if it will be permitted to operate as an ombudsman.

ANEG has been formed with little consultation and the community representation is unknown as to how they represent residents across the UK or how they have been elected.

Defra does not hold airports to account or set targets to be met in noise reduction making noise action plans pointless.

Ambient noise must be a consideration in assessing the severity of the aircraft noise. It is probably true to state that more people fly from urban

areas than rural and yet policy targets rural areas that in general have paid a premium for tranquility whereas urban living has different lifestyle requirements and desires the offerings of a noisier built up area.

8. The government is seeking to 'play god' with people's lives to benefit aviation acknowledging that there will be winners and losers but making no suggestion or offering of full comprehensive compensation for the losers.
9. There is no such thing as 'sustainable growth' in relation to aviation due to the adverse effect aviation has on local communities, local authorities, noise, air quality, green land, wellbeing of communities, wildlife habitats and climate change, all of which can not be managed or mitigated.

Aviation growth is not sustainable in its present form due to unrealistic ticket pricing and lack of resilience which will inevitably lead to more airlines in financial difficulties, eg Monach, FlyBMI, WOW. Thomas Cook is considering selling its airline, Germania airline filed for bankruptcy, Ryanair posts first loss since 2014 and now Norwegian Airlines have significant financial issues.

- a. *UK airlines seem to be going into administration on a regular basis.*
- b. *it seems advance bookings cannot be honoured and so customers are told to contact their credit card companies for a refund or in Monach's case the taxpayer picks up the bill for those stranded overseas.*

Duty on fuel and VAT would be a step forward as currently it is cheaper to fly from Gatwick to Spain than to travel by train from Gatwick to London. If there are to be subsidies this should be for other cleaner modes of transport such as trains that remove cars and freight from the roads.

CAGNE support the frequent flyer idea of taxation as only 15% of the UK population take 70% of flights** and 7 out of 10 travel for leisure and ¾ of travellers are ABC1 social class**.

**http://www.transportforqualityoflife.com/u/files/190116%20Curbing%20Aviation_A%20Fair%20Tax%20Package.pdf
Our thanks to all that have helped us to produce this report

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www.cagne.org

cagnetatwick@gmail.com

www.facebook.com/gatwickcagne Twitter @cagne_gatwick Instagram CAGNE