

CAGNE
Communities Against Gatwick
Noise and Emissions

18rd April 2017

The Department for Transport Airspace Policy Framework
Consultation

Consultation number 3: UK Airspace Policy: A framework for balanced decisions on the design and use of airspace Moving Britain Ahead

Use the following link to the consultation document:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/588186/uk-airspace-policy-a-framework-for-balanced-decisions-on-the-design-and-use-of-airspace-web-version.pdf

Points referred to are in the consultation and report. Bold are key points.

There is a summary followed by the full response.

You can email or post responses to National Policy Statement and Draft National Policy Framework for balance decisions to:

RunwayConsultation@dft.gsi.gov.uk or print it and post it to **Freepost RUNWAY CONSULTATION**

You must include your name and postal address and please use your own words to ensure you are counted. Standard replies tend to be counted as one no matter how many respond.

Summary of points:

Question 1to

The policy is being relaxed allow for a greater degree of industry self regulation without any independent ombudsman to protect communities from noise and the health implications of aircraft noise day and night.

The criteria set for a call-in over airspace changes, similar to planning by the Secretary of State, is set too high for communities that suffer Gatwick noise and desires for greater profits

What are the health costs for the UK, as aviation grows unchecked?

Health impact costs need to be factored as an equivalent to aviation (economic) growth.

Gatwick residents already suffer other airspace noise from other UK airports and yet we are expected to take more noise for leisure travel to grow from departing the UK for overseas destinations

Rural Communities are ignored when it comes to noise metrics and impact of aviation

The Civil Aviation Authority (CAA) new consultation system could be nothing more than a tick box exercises to speed aviation growth without an ombudsman

The CAA is not seen as independent as it is financed by aviation. We demand an independent ombudsman over airspace changes.

The proposed groups by the DfT and the CAA could be seen as putting all the objections to aviation growth into one basket to silence them or to be seen to be listening eg Gatwick's Noise Management Board:

Aviation is set to blight vast areas of the southeast to benefit only aviation owners and not the UK or its residents. No mitigation can ever compensate for aircraft noise and the lose of tranquillity that rural areas use to enjoy.

Aircraft will never be quiet; proper incentives need to be put in place to make aviation invest in reducing noise as they do with saving CO2 ie fuel and greater profits by reducing airtime

4.38 is seen as 'fixing' compensation:

A house is probably the largest item that a UK residents will ever purchase and thus with aircraft noise they will see a devaluation, may become trapped due to no purchasers willing to cope with the aircraft noise or negative mortgages due to the airport and changes in flight paths. This may not be the case with Heathrow communities as they benefit from London house prices that are based on the easy access to central London.

The local authorities will welcome any 106 agreements as they try to find funding and may place lesser importance on the communities that are to be impacted increased aircraft noise/ movements.

106 agreements should go to those impacted by flight path changes and not community chests as this could be seen as a bribe to take noise that others are not prepared to tolerate.

Aviation is seen as a 'boys club' with little consideration of impact on lives and health of communities impacted; the balance needs to be re-addressed:

The Government shows lack of understanding of what aircraft noise means to people.

Question 2

Out of date noise metrics and noise mapping, which does not illustrate aircraft impact on lives, health or that of noise events nor the frequency with which Gatwick flies them per hour. Gatwick seeks 60ATMs an hour. Noise difference for rural areas is still ignored whereas it is known that there is a 10dB difference between aircraft noise in urban compared to rural areas.

5.5 Respite is a word for managing the number of aircraft an airport seeks to fly. At Gatwick we see no feasible way of implementing respite without impacting newly over flown people

DfT principle of quieter planes is to be endorsed but quieter planes should not be replaced by an increase in the number of planes as this then outweighs any reduction in noise decreases, as no plane will ever be totally quiet. It also removes any CO2 saved

5.8_ Is to be welcomed as long as 'multiple routes' do not mean multiple concentrated routes

CAGNE would encourage that all noise complaints be taken seriously and recorded from all of the population that are impacted by aircraft noise whether they are under an NPR, arrival swathe or newly overflowed as aircraft noise in rural areas is known to be 10 decibels (dB) higher than in urban areas (WHO)

Aviation Growth demands has been turned into a numbers game where those on the ground do not win and are treated as numbers significantly impacted by noise instead of taking into account ambient noise

5.14 We are delighted that CAGNEs words have been used in 'One size does not fits all' approach. We welcome this understanding and hope that this will lead to Gatwick actually listening to communities and that a clear voice can be found to be fair to all and not just those that shout the loudest.

5.17 The impact of efficiency leads to maximum frequency during peak times and this presents unacceptable levels of aircraft noise.

Aircraft will never be silent and thus consideration must always be given to areas not impacted by noise before PRNAV was introduced

5.24 'Sharing benefits' but we would question the benefits to those on the ground with PRNAV as, as yet, none has been witnessed.

5.34 details the SoNA research whereby most of the data was formed on Heathrow with little consideration to the rural areas around Gatwick and the impact aircraft noise has on these areas.

5.35 Night flights. Night noise is far greater in rural areas due to the ambient noise dropping further at night. As Gatwick has no restrictions on arrivals or departures at night and the Government detailed no restrictions or reduction in night movements that goes against the WHO guidance. Gatwick does not give communities 8 hours sleep and has peak departure movement from 11-12 midnight and 6-7am that have serious health implications. We are concerned that a ban at Heathrow will cause more night flights at Gatwick.

More labelling of communities impacted by noise:

5.36 We welcome NOEL, LOAEL and SOAEL but question how it will be used effectively to relieve communities from Gatwick's desire for growth; is this just another form of labelling with no noise reduction action

To average out noise is not a true record of the aircraft noise residents are expected to endure eg CAA PIR review

5.52 Communities do not necessarily wish to know about the noise, they are not interested in the noise, but they do want the noise to be reduced or removed. Therefore there should be limits on the amount of aircraft noise communities are subjected to per hour whether it is over flight or noise shadow.

Question 3

The CAA's creation of ICCAN is not a positive move for communities as these groups are seen as having no power and simply forums so that boxes are ticked as being consulted – lack of transparency on the CAA and Dft behalf.

No proper compensation for those impacted by aviation growth seems to be offered. Only the value of a home and cost of moving is acceptable in a 30 mile radius of Gatwick.

Question 4

Gatwick has a vested interest in profits not communities. To suggest putting Gatwick in charge of airspace changes is totally unacceptable to communities:

We would strongly oppose allowing Gatwick the freedom to play with Noise Preferential Routes as under the current policy and what is suggested there would be no compensation for residents that moved outside the NPR and paid a substantial amount more to be outside the NPR.

The Government should be seeking to restrict the aviation industry growth rather than encouraging more low cost airlines to take money out of the UK.

7.16 As to 'Gatwick drawing on the experiences of those living near these airports to develop community driven approaches to managing noise'

This statement above has to be questioned as although the NMB was formed it has still yet to find solutions to aircraft noise with Gatwick seemingly listening but ignoring the full picture of arrivals and departures and the impacted aircraft noise is having on communities to the east and west.

The NMB needs a better balance and CAGNE has worked to ensure that the Aviation Council Forum provides this.

CAGNE are very disappointed that Gatwick having offered it before is now not offering a review of departures.

7.19 'If the CAA felt that its advice on appropriate balance was not being given proper consideration and appropriate followed by industry, we would consider the need for further regulation'

CAGNE would ask by what would quantify 'proper and considered' and we are concerned that too much authority will be handed over to the sponsor with a tick box exercise to full fill for completion of changes with no ombudsman for residents to appeal to.

The Government should be questioning the environmental damage aviation has on the world:

Concern over Aviation Growth and lack of controls by allowing this industry to self regulate with growth and saving CO2 being key with little consideration, compensation for those on the ground that have to suffer the noise and health implications day and night.

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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Answers in full to the Department for Transport Airspace Policy Framework Consultation

Questions on Chapter 4

Q1. Please provide your views on:

1. **the proposed call-in function for the Secretary of State in tier 1 airspace changes and the process which is proposed, including the criteria for the call-in and the details provided in the draft guidance.**
2. **the proposal that tier 2 airspace changes should be subject to a suitable change process overseen by the Civil Aviation Authority, including the draft guidance and any evidence on costs and benefits.**
3. **the proposal that tier 3 airspace changes should be subject to a suitable policy on transparency, engagement and consideration of mitigations as set out by the Civil Aviation Authority.**
4. **the airspace change compensation proposals.**

1) 4.24 The call-in criteria by the Secretary of State is set too high at 10,000 complaints to be possible around Gatwick and thus is seen as unfair and not feasible to be a route communities can take to object to an airspace change conclusion made by the CAA only.

A JR is too costly for most communities and thus prohibits residents from seeking a fair and equitable conclusion to the sponsors desire for greater efficiency of the sky and profits from increases in aircraft movements or changes to airspace ie the removal of NPRs or new routes.

Health impact costs need to be factors as an equivalent to aviation (economic) growth.

4.22 'changes deemed to be of national importance' we would question this as it would seem they are of only aviation profits importance and do little for the UK residents that suffer the fallout of aviation in noise, emissions and health implications. Also aviation does not pay duty on fuel, VAT like other industries and should be made to conform due to our national interest to fight climate change.

4.37 The 16hr averaging of noise is not acceptable as the frequency per hour of noise events is not a consideration by averaging noise out over 16hrs where there will be quiet periods. The 54dB LAeq 16hr is totally inadequate as it does not accept that Gatwick impacts in a 30 mile radius nor does make differentiation between rural or urban areas to impact of aircraft noise nor that the noise metrics are flawed.

4.23 Noise should be the number one consideration up to 6,000ft especially in rural areas. Airports should be permitted to take this stance when communities are being particularly impacted by aircraft noise.

4.27 Heathrow has an impact on Gatwick flight paths and thus Heathrow, arrivals to Gatwick east as well as Gatwick arrivals and departures impact residents surrounding Gatwick, especially to the west. These communities suffer from unfair aircraft noise where they receive no respite 365 days a year 24 hours a day.

2) 4.31 We welcome the acknowledgment of the impact of aircraft noise below 7,000ft by the document.

4.17/ 4.9 is already a problem for communities that feel they are newly overflowed due to the concentrated routing and increase in frequency of aircraft over them. This is known as vectoring but for rural communities not impacted before by aircraft noise, above 7,000ft has an impact as does Heathrow flights over the west of Gatwick which cause noise, disturbance as well as fixing Gatwick routing low.

ATC are seemingly using new technology to simplify their workload rather than benefitting those on the ground.

The CAA is not independent due to being funded by aviation, workers are ex-aviation and see the industry as favourable rather than being objective or taking a fair stance for all parties. An independent ombudsman outside of the CAA is required.

4.26 The CAA seek to offer transparency in the new consultation system but do not seek an independent ruling with an ombudsman on what is fair to all outside of the industry as the CAA is paid by that it obviously serves.

Vectoring, a practice allowed by the CAA, creates new noise for communities and thus should be covered under Tier 1 if it becomes a concentrated routing/permanent flight path.

3) 4.21 4.20/ 4.21 would seem to suggest that any change is permitted as long as some 'mitigate' format can be found. It could be suggested from this that as long as a route is moved slowly over time communities will not be consulted as it is hoped they will not notice the noise as it gradually increases. This is totally unacceptable as communities moved to areas of tranquillity to be quiet and thus an airport should not be permitted to remove this by 'what has to be called crafty slowly, slowly' procedural seemingly behaviour endorsed by the elected Government.

4.34 We re-iterate that the CAA are not seen and are not independent. The new Independent Commission on Civil Aviation Noise is seen as a 'puppet' as those already selected for the DfT ANEG as communities are not permitted to have a fair voice on this nor permitted to have details of those 'named individuals' that sit on ANEG. This is not transparent to communities and thus we see ICCAN no different and just another tool to move airspace change and grow aviation with no input from communities as those that sit on ANEG that and selected are out numbered by aviation-favoured - 12 aviation to two non aviation bodies.

EG ANEG members include representatives from each of:

- air navigation service providers
- airlines
- airports
- Aviation Environment Federation
- Civil Aviation Authority
- community groups
- express delivery industry
- general aviation
- independent noise body (when established)
- local authorities
- aerospace manufacturers
- passenger organisations
- Sustainable Aviation
- UK airport consultative committees bodies.

4.35/ 4.36 'industry seek to mitigate its impact through compensation' This is laughable as communities that are impacted by frequent noise 365 days a year 24 hours a day do not get compensation in the full sense of the word. Communities do not receive full house value and relocation costs for all that are impacted by new flight paths or changes to flight paths. Gatwick currently seek to blight these residents with their Arrival Review. Document **IMM4** details areas not recognised by the DfT, CAA, NATS, GAL as constantly being overflown and yet they receive no form of compensation. Insulation, double glazing, £1,000 off council tax for a few is totally unacceptable as compensation or migration for loss of tranquillity, quality of life, health and house devalue is greater.

IMM4 mapping impact to a inexperienced person would suggest all these areas are totally blighted by aircraft noise and thus undesirable and of less value.

Aircraft noise cannot be mitigated and only full compensation for all in a 30 mile radius to the airport can be seen as true mitigation for the destruction of tranquil areas in the southeast by Gatwick or Heathrow. Therefore communities will see the body of ICCAN as a 'puppet' for the industry and simply another ineffective tier of bureaucracy with the sole aim of aviation expansion at any cost.

4.29 It is questionable to what benefits, if any, there are for communities with modern technology as it is seen as moving noise away from some to make noise unbearable for a few. Prior to this the dispersal of noise had been a known factor and was not perceived to have a significant impact on communities. **Please see PRNAV evidence document.**

4.38 is seen as 'fixing' compensation by those that seek to profit ie airport and thus cannot be seen as fair as it will not match communities desire for comprehensive compensation compared to the desire for greater profits by the industry and the Government against UK residents.

A house is probably the largest item that a UK residents will ever purchase and thus with aircraft noise they will see a devaluation, may become trapped due to no purchasers willing to cope with the aircraft noise or negative mortgages due to the airport and changes in flight paths.

The local authorities will welcome any 106 agreement as they are try to find funding placing lesser importance on the communities that are to be impacted we give the prior example of the West Sussex County Council leader who supported Gatwick expansion as she is based in Chichester away from Gatwick. This would be seemed as setting another 'war of communities' fighting against those that are meant to represent them as elected by the people.

106 agreements should go to those impacted by flight path changes and not community chests as this could be seen as a bribe to take noise that others are not prepared to tolerate, ie those that shout the loudest.

4.4 Proposal – this does not go far enough. Airports have a vested interest as does the DfT and the CAA in aviation profits with no consideration to the impact this industry has on climate change or its UK residents. We would strongly suggest that aviation be made to pay its way similar to other industries. The Government could see large increases in profits if aviation was made to pay green taxes, duty on fuel and VAT. A frequent flyer Airport Passenger Duty would also be suggested to make the consumer aware of the damage they do to the environment by holidaying overseas. Growth at Gatwick is purely fed by low cost airlines, budget holidays overseas and this has to stop.

It should be suggested that the growth in aviation is fuelled by low cost airlines and budget holidays that does nothing for UK growth or climate change targets.

4.48 We welcome acknowledgment of the frequency of aircraft movements contributing to impact of aircraft noise.

4.50 'Given that this is a relatively small number, extending the policy to cover those already living without the contour should not entail great financial cost, not least because we would expect most of these houses already to have some level of insulation.'

This statement illustrates that the Government has no understanding of the impact Gatwick has on rural areas and we would ask them to reconsider noise metrics, noise contours, as for the majority around Gatwick who are impacted by ever increasing number of aircraft, Gatwick does not provide compensation or insulation for them.

Q2. Please provide your views on:

- 1. the proposal to require options analysis in airspace change processes, as appropriate, including details provided in the draft guidance.**

2. the proposal for assessing the impacts of noise, including on health and quality of life. Please provide any comments on the proposed metrics and process, including details provided in the draft guidance.

Page 41 We are delighted to see that the **CAGNE theory has been used to show how PRNAV** can avoid and impact communities. But what is disappointing is that the houses are in rows whereas they are in spread out areas in rural communities and thus this graph is not applicable to Gatwick areas. It shows the shortcomings of the new technology in A being that random dispersal is no longer feasible.

The majority of communities reducing the impact of PRNAV want random dispersal.

5.3 / 5.4 We are concerned that this is a numbers game to enable new routes to be introduced via vectoring over newly affected people. We are disappointed that there is not comparison metrics to impact of noise on rural areas compared to urban absorption of aircraft noise.

We would have liked to see noise the number one consideration up to 6,000ft

5.5 Respite is a word for impacting newly flown over people as for Gatwick to offer respite it would have to significantly impact new areas with flight paths.

5.6 PRNAV – **please see the impact of concentrated flight paths on communities document produced by CAGNE, evidence based paper.**

5.8 is to be welcomed as long as ‘multiple routes’ do not mean multiple concentrated routes.

5.10 We welcome the DfT using WebTAG but asked that health be given the same consideration as to aviation growth, efficiency and profits.

Here we site **Arrival Review IMM 17** which discriminates against a vast number of the population around Gatwick and thus data from this new web page complaints system is no fair to all and actively deters people from complaining.

5.12 We ask if this is to include the CAP 1498 noise shadow of 48.5 degrees or 60 degree shadow; the 48.5 degree would be inadequate to illustrate the noise impact from concentrated routing and the frequency it is flown in hour periods.

Page 43 clearly shows the disappointment felt over the new technology but it should not suggest the removing of NPRs to accommodate new routes over new areas as this would be strongly objected to as residents have bought homes at high market values due to not being over flown and they would not receive compensation now or under the new Government guidance.

This is seen as a numbers game whereas rural areas are not given the same consideration as urban where it has been proven that aircraft has a far greater impact on rural areas than urban, so 10dB. Noise should be the number one consideration up to 6,000ft as at even 7,000ft aircraft still have a major impact on rural life.

Multiple routes will be seen as new routes outside the NPR that are not acceptable at any price.

Page 44 Gatwick already has similar to the diagrams shown with departure Route 4, BOGNA and SAM which impacts the same residents due to PRNAV on all routes and the vector on Route 4 to the north east whereby the engine noise is felt by those that suffer BOGNA and SAM. The same cannot be said of Route 2 and 5 with Route 3 to the east.

Those that suffer BOGNA, SAM and Route 4 also suffer easterly arrivals, Gatwick arrivals to the east of the runway and Heathrow traffic.

We cite the Arrival Review IMM 11 which seek to place more aircraft at night over those that already suffer arrivals and departures with no respite in the west, whilst increasing departures on routes that are kept low due to over flight of Heathrow. This shows that Gatwick cannot be trusted with airspace and that they seek to please those that 'shout the loudest' rather being fair to all. **Please see CAGNE document IMM 11.**

5.14 We are delighted that **CAGNEs words have been used in 'One size fits all' approach.** We welcome this understanding and hope that this will lead to Gatwick actually listening to communities and that a clear voice can be found to be fair to all and not just those that shout the loudest.

5.17 The impact of efficiency leads to maximum frequency during peak times and this is unacceptable level of aircraft noise. To situate concentrated routes close to each other creates greater noise walls of noise combined with max frequency of routing at peak times. Gatwick already impacts communities with this. With larger planes comes benefits for saving CO2 but this is terminated if Gatwick is permitted to increase numbers of movements. With larger planes Gatwick has seen some growth in passenger numbers, still marginal compared to other airports, but it has not provided any financial assistance to deal with the added congestion these passengers have added to the one road and railway that can't cope with the current level of numbers Gatwick injects to the public transport network or roads. This in turn causes greater burden for local authorities, commuters and pollution throughout West Sussex and Surrey.

Aircraft will never be silent and thus consideration must always be given to areas not impacted by noise before PRNAV was introduced.

DfT principle of quieter planes is endorsed but quieter planes should not be replaced by increasing in the number of planes as this then outweighs any

reduction in noise decreases, as no plane will ever be totally quiet.

5.18 If 'sharing noise' is deemed as consisting of new routes we would strongly object to these as aircraft at 7,000ft in rural areas has a major impact on rural communities.

5.19 would seem to suggest that aviation will cherry pick who they consult with and only consider evidence based reporting dismissing those that are impacted by do not have the time to produce lengthy reports. This would seem a very unfair attitude towards communities that are to be impacted by a large wealthy industry. It may be that other groups that can employ staff, shout the loudest, threaten legal action, etc to move noise from them over others.

5.20 Talks of engaging to find routing with pros and cons of concentrating traffic on a single route, which normally reduces the number people overflown. We would site CAP 1498 document to the angle of aircraft and the noise shadow it produces. It may be possible to not significantly impact communities if a constructive format is found.

5.21 We see fuel consumption immaterial if it reduces the noise impact it has on communities. There has to be a balance between saving fuel and impact on health and quality of life for those on the ground.

5.24 'Sharing benefits' but we would question the benefits to those on the ground with PRNAV as, as yet, none have been witnessed. The wording 'significantly affected' we would ask that the **CAGNE report on PRNAV** be taken into account. We appreciate that the wording is taken from the ICAO targets but would question if this is correct. Should aircraft noise be shared by urban and rural rather than targeting the rural by this stance and making airspace into a numbers game? It is a known factor that rural areas suffer aircraft noise by 10dB higher than urban areas as towns and cities have a higher ambient noise of say 70dB where as rural is 30-35dB. An aircraft of 80dB noise is absorbed by the surrounding noise of towns and cities whereas in rural tranquil areas the noise has a significant impact.

5.28 Is welcomed with caveats as it still refers to reducing the number of people significantly affected by aircraft noise.

5.31/ 5.32/ 5.33/ 5.34/ We would ask that the **CAGNE PRNAV report** be accepted here as an indication of the health impact of PRNAV. The suggestion of affect of noise is similar to 'turning up the volume of the television or speaking behaviour' is totally unacceptable as aircraft noise cannot be stopped whereas both of these can. It is the frustration of communities that they are trapped without being able to stop the noise is the key to the start of health implications.

5.34 details the SoNA whereby most of the data was formed on Heathrow with little consideration to the rural areas around Gatwick and the impact aircraft noise has on these areas. The suggestions therefore are

unacceptable as it is suggested that annoyance can be seen to occur down to 51dB over an average of 16hrs. We note that the tolerance of noise has dropped from 57d/b LAeq 16hr to 54dB LAeq. Had the survey focused on rural areas they could report that rural areas have an ambient noise of 30-35dB and an aircraft going over is over 70dB which is far more than the 10dB accepted by WHO. Thus rural areas are severely impacted by aircraft noise far more than urban and should be acknowledged.

5.35 Night flights. The Secretary of State introduced a noise abatement procedure of not landing before the 10nm to the ILS. It would seem wrong therefore for communities that are only impacted by arrivals far from an airport should have the same voice as those impacted close to the airport by ground noise, arrivals and departures who can't escape due to being on the departure route of a number of routes as well as the final approach.

Night noise is far greater in rural areas due to the ambient noise dropping further at night. As Gatwick has no restrictions on arrivals or departures at night and the Government detailed no restrictions or reduction in night movements that goes against the WHO guidance. Gatwick does not give communities 8 hours sleep and has peak departure movement from 11-12 midnight and 6-7am that have serious health implications.

5.36 We welcome NOEL, LOAEL and SOAEL but question how it will be used effectively to relieve communities from Gatwick's desire for growth; is this just another form of labelling with no noise reduction action? It is therefore seen as only a way of indicating how communities are impacted, ie labelling of communities surrounding Gatwick.

5.41 We would welcome this and more details to the calculations inputted into WebTAG as the count come is only as good as the data input.

For instance the research carried out by DEFRA is not seen as extensive as it is understood that it was a telephone survey of selected areas and not specifically about aircraft noise. We suggest that Gatwick contribute the Hypertension, through increased risk of stroke and dementia to the peak movements from 5.30-7am when residents are in light sleep. Gatwick impacts health and thus add costs for the NHS.

The WebTrak system normally gives height above airfield level (AAL) in the aircraft label, although somewhat confusingly the Webtrak system seems to select the closest point of approach to any postcode gives height above average mean sea level (AMSL) – which can add height to the AAL height.

5.43 Seeks to use average of noise that is unacceptable and should have noise events per hour.

5.44 N-above metrics is a start in the right direction but does not go far enough to truly represent the impact around Gatwick of aircraft noise

5.46 The suggestion of CAP 1498 be included is welcomed as long as the 60

degree measurement is used.

5.49 Needs to be cost factored into the equation.

5.51 We welcome the use of CAP 1498 but again question that it goes far enough to understand the true impact of PRNAV especially at night where it is suggested that N60 should be used compared to N65 during the day?

5.52 Communities do not necessarily wish to know about the noise, they are not interested in the noise, but they do want the noise to be reduced or removed. Therefore there should be limits on the amount of aircraft noise communities are subjected to per hour whether it be over flight or noise shadow.

Questions on Chapter 6

Q3. Please provide your views on:

- 1. the Independent Commission on Civil Aviation Noise's (ICCAN's) proposed functions.**
- 2. the analysis and options for the structure and governance of ICCAN given in Chapter 6, and the lead option that the Government has set out to ensure ICCAN's credibility.**

6.4 ICCAN 'role in facilitating industry and communities to communicate effectively with one another in order to reach balanced decisions', 'not to act as a lobby group or to oppose changes' In view of the wording of this we question the purpose of such a group as it would be seen as a route to facilitate industry growth at any cost to communities.

The community bodies will simply seek to get as best deal possible for their area whilst other areas suffer unless all areas are represented.

We see this group, if similar structure to ANEG, that the number of aviation seats outweighs the community representation. ICCAN will be seen as another tier for aviation to compile with so that they can progress in making changes without taking on board objections to growth and impact of growing noise.

6.6 Who will sit on ICCAN as the community voices? How many seats will communities be given? Will the CAA and DfT select those that they feel will co-operate with them as with ANEG rather than having true community voices on the groups?

6.7 seems very similar to ANEG which we are not permitted to have the names of those that sit on ANEG. If it is to be public funded then the public should have direct access to all members unlike with ANEG. It should also have a public forum whereby communities can make representation to them

over airspace changes, etc.

6.8/ 6.9 We question how it can be independent when the bodies that will take seats seem to be from aviation and include the CAA and DfT that seeks to grow aviation with little consideration to climate change impact and impact on communities. If this is to be funded and sit with the CAA it can not be seen as independent.

6.12 if aviation is in charge of ICCAN then it will simply become 'demonstrate good noise management practice' instead of seeking to reduce noise and lobby the industry to invest in quieter planes and adopt NBP.

6.13 Research will be carried out by who? And set by who? As if funded by the public purse then it should be subject to residents to use as a research arm to assist them in formalising challenges to airspace changes, etc

6.15/ 6.16 There seems to be no mention of impact on house prices, whole communities devalued due to aviation changes, surely this must sit under ICCAN as well as dictating the level of compensation required for such changes ie full house price before changes to flight paths as well as relocation costs.

6.18 The CAA follow the Governments desire and that of NATS and aviation for growth and thus are not outside of the industry or objective.

6.20 If the ICCAN are accountable to the Government due to funding; this surely must mean they can be influenced by Government to decision they make?

6.22/ 6.25 We note your suggestion that the CAA may not be seen as independent but the governance suggested does not remove the fact that they are paid by the industry it serves ie they seek to make the sky more efficient, better experience for passengers, reduction in delays, etc.

Questions on Chapter 7

Q4. Please provide your views on:

- 1. the proposal that the competent authority to assure application of the balanced approach should be as set out in Chapter 7 on Ongoing Noise Management and further information at Annex F.**
- 2. the proposal that responsibility for noise controls (other than noise-related operating restrictions) at the designated airports should be as set out in Chapter 7 on Ongoing Noise Management.**
- 3. the proposal that designated airports should publish details of aircraft tracks and performance. Please include any comments on the kind of information to be published and any evidence on the costs or benefits**
- 4. whether industry is sufficiently incentivised to adopt current best practice in noise management, taking into account Chapter 7 on Ongoing Noise Management, and the role of the Independent Commission on Civil Aviation Noise in driving up standards in noise**

management across the aviation sector.

1) 7.1 to address noise every 5 years is a very long time for residents suffering noise from aircraft thus we would suggest a shorter time period.

7.2 We would agree that night movements should be capped per route flown with a ban on departures between the hours of 11pm and 7am. We raise concerns over a ban at Heathrow will lead to Gatwick having more night movements.

7.3 To 'address noise problems in the most cost effective way' would suggest that this is based only on aviation profits and not the devaluation of electorate's homes due to aircraft noise that is very apparent around Gatwick. And we would question why community noise does not take precedence over aviation profits especially as they, in Gatwick's case, take money out of the UK purse.

7.4 as to land-use and planning; houses surrounding Gatwick were in place when Gatwick was a horse race course and thus these have been subject to Gatwick and the desired profits of the owners of Gatwick. We would question the balance of this argument as it is very much seen as 'closing the stable door after the horse has bolted'. Gatwick was never planned to be a large international airport but a subsidiary to Heathrow when impacted by poor weather. At present new housing estates are being built which will be impacted by Gatwick's flights paths but due to the noise metrics the buyers will be guided that they do not suffer noise.

We submit the CAGNE document to the [Gatwick Arrival Review IMM 4](#), a document that blights vast areas around Gatwick with flight paths and yet are not recognised by the Government or Gatwick as being impacted by aircraft noise.

7.5 Come March the Government will seek to remove itself from the European Union as a result of UK residents voting to leave. We would therefore question why the UK has to continue to subject the UK residents to the purgatory of 'one sky', which brings modernisation that was set purely to benefit aviation and not UK citizens, this could be 'GATWIX' for communities.

7.6 Until these bodies, UK Government or EU non-elected members, decide and follow the aviation agenda, we can not see how they can be called independent.

We welcome assessment of noise on a regular basis but question the metrics and those that decide the outcome of any decision.

7.7 'locally agreed conditions of planning permission' The issue here is that Crawley is the planning authority for Gatwick and yet do not get overflown and thus do not understand the impact of aircraft noise day and night 365 days a year. At the same time West Sussex County Council are based in Chichester and again do not appreciate the issues that local councils have with Gatwick's

aircraft noise. We would submit that any planning must go out to those impacted by aircraft noise or/ and ground noise and not to be kept within the 57Leq contours.

7.9 UK citizens are asked to accepted modernisation of airspace and yet they are not given any new consideration. If new aviation criteria is to be put in place which will benefit aviation then other changes must also be made to accommodate the increases in the frequency of noise, the concentration of routing and that the no fly areas be re-examined as at present Gatwick has Horley and Crawley as no fly zones. As they are the planning authority they can agree to increase aircraft noise without consulting those areas to be impacted. GATCOM approved the introduction of PRNAV on all departure routes in May 2014 with parish and town councils only sent a letter informing them of an 'insignificant' change to routing. This is seen as not to be transparent as not fair to all that have been impacted by aircraft noise and yet the councils have had to accommodate very angry residents with little say on GATCOM or NATMAG.

CAGNE has formed the Aviation Council Forum to ensure this does not happen again of which town and parish councils are members and discuss the impact Gatwick has on their communities. This is seen as a unique forum and allows them to discuss issues and network which is missed by the normal council channels of Horsham DC, West Sussex CC, Surrey CC and East Sussex Council.

Members to date (10.3.17)

Abinger Parish Council
Alfold Parish Council
Denne Neighbourhood Council
Ifold and Plaistow Parish Council
Kirdford Parish Council
Lower Beeding Parish Council
Loxwood Parish Council
North Mid Sussex Council
Nuthurst Parish Council
Rudgwick Parish Council
Rusper Parish Council
Salford and Sidlow Parish Council
Shipley Parish Council
Slinfold Parish Council
Warnham Parish Council
West Grinstead Parish Council
West Hoathly Parish Council
Worth Parish Council

Associate members:

Burpham & Wepham Parish Council
Broadbridge Heath Parish Council

7.10 NPR – Noise Preferential Routes – are very important around Gatwick as residents moved to areas outside of the NPR and paid a premium to be away from aircraft noise. Due to the introduction of PRNAV much has already been lost as well as the gradual move of the centerline on the BOGNA route ignored by the CAA PIR review which only detailed Routes 4, 3, 5 and 2 without any form of consultation. To remove the NPRs would subject new communities to constant aircraft noise without any form of compensation for the loss of house price and quality of life. There are not benefits to these residents to have the NPRs removed.

Residents that moved under an NPR were aware of the flight paths and thus paid a reduced price for homes and may have more urban ambient noise. To place Gatwick in charge of airspace is similar to putting a 'fox in charge of the hen house', communities would suffer and Gatwick cannot be trusted as previously stated.

A few nautical mile move in airspace terms has a major impact on those on the ground when PRNAV is introduced we site Route 5, 3, 2, 4 and BOGNA as examples of anger and upset caused at Gatwick by the introduction of PRNAV to all departure routes in May 2014.

If a house has never had aircraft noise and then it is taking it from 30-35dB to over 70dB with a frequency of every 1-2 minutes. This is a significant change and one that can only be made with full compensation for loss of house value some 30 mile radius.

House prices in London do not suffer the same from aircraft noise as rural homes around Gatwick.

7.13 We would point out the local authorities that are screaming out for extra revenue see Gatwick as a way of obtaining this. Gatwick would see any 106 agreements as a positive knowing that the local authority will probably ignore the electorate views to obtain greater revenue.

7.16 As to 'Gatwick drawing on the experiences of those living near these airports to develop community driven approaches to managing noise' This has to be questioned as although the NMB was formed it has still yet to find solutions to aircraft noise with Gatwick seemingly listening to those that 'shout the loudest' and ignoring others that are severely impacted by aircraft noise. They have set a procedure, which is not currently working, for all communities impacted by noise. We would suggest that there is an imbalance in their approach to finding a fair and equitable distribution for all and are listening to those that seek to move noise from one area over another. The NMB needs a better balance and CAGNE has worked to ensure that the Aviation Council Forum provides this but at present it counts for nothing compared to individual voices.

We site the CAGNE IMM 11 report.

7.19 'If the CAA felt that its advice on appropriate balance was not being given proper consideration and appropriate followed by industry, we would consider the need for further regulation' CAGNE would ask by what would quantify 'proper and considered' and we are concerned that too much authority will be handed over to the sponsor with a tick box exercise to full fill for completion of changes with no ombudsman for residents to appeal to.

We quote NATS and the CAA as an example of how the CAA is not independent or impartial to the industry it serves:

https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Our_work/Corporate_reports/Board_minutes/Board%20Minutes%20December%202016.pdf

*31. Airspace change: NATS had introduced performance-based navigation on some upper-airspace routes. The greater challenge was airspace modernisation below 10,000ft close to airports. The revised airspace change process required more community engagement on noise impacts, and greater policy clarity was needed from the Government. **NATS was concerned at the implication that when modernising airspace, a negotiated settlement could always be reached with communities, or that noise should be distributed equitably; in reality, this was not always possible or sensible.***

***NATS therefore proposed a table-top exercise to trial an airspace change where difficult choices were needed.** The Board welcomed this initiative and explained the CAA's own position on securing clarity in government airspace policy. NATS thought that, given finite airspace design and regulation resources, the CAA may need to rank airspace change proposals to prioritise those where modernisation was most needed, if a cap on capacity in particular sectors was to be avoided. A new Heathrow runway also had significant airspace implications, including for other airports.....*

7.21 With Gatwick, which is hungry to sell and thus has a desire for 'all year round growth', we would question any actions that they will take against an airline that is not meeting scheduling and being permitted to fly when it would not normally be restricted due to scheduling eg QC 2, QC4, and yet Gatwick use dispensation with no seemingly consideration to the impact the noise has on communities in the early hours - Gatwick's dispensation for Summer 2015 343 and Summer 2016 474. We site Medview and WestJet, over 20 year old planes; ICAO Chapter 2 & 4 aircraft have been permitted to fly at night out of Gatwick by Gatwick. Gatwick, due to its nature of business, welcomes new, low cost airlines which do not necessarily fly modern planes like Dreamliner, and thus the communities surrounding Gatwick are subject to more noise and movements than other airports, eg EasyJet four rotations during the day and night to meet scheduling and profits.

7.28/ 7.29 We would of wished for a ban on night flights at Gatwick with 8 hours sleep so no flights from 11pm to 7am. Alternatively we would have wished for a reduction in night flights and yet the Government has sort not to restrict Gatwick from growth. We see the natural respite of winter flights

diminishing due to the new appointment of staff at Gatwick to seek to increase long-haul low cost airlines for winter sun.

Night flights have serious health risks especially during the 5.30-7am periods when light sleep is experienced that surround Gatwick. www.aef.org.uk

Example of Gatwick's leisure business:

'**Dubai** topped Gatwick's list of the most popular long-haul points with an 8% increase over 2016, accounting for 76,965 of the 3m passengers that used the airport during the month. **St Lucia** added 52% more passengers and **New York** with 66%. **Los Angeles** was 90% up on the same time last year.' ^b

This clearly shows Gatwick is exporting more UK sterling out of the UK through long haul low cost winter holidays rather than bringing customers into the UK to spend money in the UK.

Long haul will bring greater 'belly' freight, 6% just cargo increase ^b, as freight has to pass Heathrow and Standard to reach Gatwick, and so this growth is purely seen as spare space and not genuine freight carriage of cargo which is the case at Stansted and Heathrow. The increase in weight of these planes also results in planes being lower over the elevated communities that surround Gatwick.

7.35/ 7.36/ 7.37 'We propose transfer of the ownership of the NPRs at the designation airports' this is totally unacceptable to communities that surround Gatwick. Gatwick has proven time and time again that it can not be trusted and that profits come before communities and thus we can not accept this.

We would echo the stance of GACC when they likened Gatwick in charge of NPRs and flights paths as like putting a 'fox in charge of the hen house'.

We note the 'airports would be able to retain and manage the NPRs if they wished to' but we would site the fact that Gatwick placed ADNID trial outside the NPR to test a 20 degree separation over areas outside the NPR and so impacted newly overflowed areas of conservation importance with no environmental data collected to impact. They then subject these residents to this route being one of the 5 new routes off a second runway having assured them that it was just a 'trial' route. They then subject residents to ADNID appearing in three forms pitching communities against each other in the LAMP 2014 document.

The CAA approved ADNID and residents, elected bodies were not permitted to know of the trial at Gatwick's request.

Gatwick cannot be trusted with NPRs as proven time and time again, as profits come before local communities. At the CAGNE AGM on the 3rd March 2017 Gatwick management assured residents that they did not seek a second

runway and were not working towards one. The CEO of Gatwick said in the Times on 12th March and 13th March the following proving Gatwick cannot be trusted to be honest to residents or take on board their concerns:

‘Airport CEO Stewart Wingate said: “These figures demonstrate Gatwick’s vital economic role both within Britain and internationally, as we continue to offer the government a credible and deliverable option for runway expansion.”’

The impact of ADNID still impacts the communities and their house prices due to the ADNID Gatwick trial route which we understand Gatwick volunteered to undertake. The areas subjected were seen as desirable areas to live but now there hangs a big question mark over these areas due to Gatwick’s actions. ADNID is still in SESAR documents having been assured by Gatwick it had been removed time and time again at GATCOM.

Gatwick told GATCOM that should PRNAV cause significant impact on communities it would go back to dispersal. This has never been done.

To remove NPRs would be to put new people under new aircraft noise and thus significantly impacting new areas to aircraft noise, especially as Gatwick seeks all year round growth.

A major concern is that Gatwick will use CCO to try and ensure residents that they will not be impacted by changes to NPRs. This would be force information as no plane is quiet, the larger A744, A380 cannot climb like A320. The A380c has been shown at Heathrow by the CAA not to be as quiet as stated and the growth of the A380 has slowed due to market forces. A worry now is that CCO will be used and planes will be permitted to leave the NPR/SID to vector at 4,000ft impacting new communities. Even at 7,000ft Gatwick impacts residents with aircraft noise due to the rural locations that surround Gatwick, for example Cranleigh, Slinfold, Lewes, Rustington, Plaistow, etc

Communities close to Gatwick take the full impact of arrivals and departures 7 days a week 24 hours a day with no respite for many. Gatwick gives no consideration to the number of planes they fly per hour or the impact they have on communities they let Chapter 4 planes depart at 2 and 3am, thus they cannot be trusted with the importance of NPRs and community quality of life.

Gatwick has no standard Noise Abatement Procedure that all airlines are told to adhere which clearly illustrates that Gatwick seeks profits over community noise.

We are still awaiting a review of PRNAV on departures that was promised by the Gatwick then Chairman to MPs in 2016.

8.4 As the CAA supported the ADNID trial and changes to airspace without full consultation, the CAA is no trusted and is seen as a mechanism that

seeks to assist aviation in growth with little consideration to the environmental impact on rural communities.

It is detailed that options are to be given to communities and we would sight that the CAA approved the LAMP document of 2014, which pitched communities against each other with three options of ADNID. Communities came together under CAGNE to say no to all three, as the impact of the concentration would have been significant from all three routes.

Sadly the CAA is seen as a part of the aviation 'boys club' and one that communities are not members of but who are tolerated in a plan to push through change to benefit aviation and not communities or climate change.

The recent ICAO agreements are 'weak' on climate change and allow developing countries such as Russia to fly old ex-military planes that do not have to meet ICAO chapter on noise. Much of the Paris agreement was simply paper work and the aviation industry reported that it would do little to impact aviation.

<http://www.icao.int/Newsroom/Pages/ICAO-Council-adopts-new-CO2-emissions-standard-for-aircraft.aspx>

For example ICAO adopts CO2 emissions standard for aircraft - this is simply a manufacturing standard that applies to all new in-production commercial and business aircraft delivered from 2028, with a separate technology standard for new aircraft designs from 2020.

The level of stringency is weak - the average new single and twin aisle commercial aircraft in 2017 already complies, 10 years before it comes into force! There is scope to do much more and work to look at increasing the stringency needs to begin right now if noise is to be a consideration for airline development.

It is about time that the aviation industry was made to compete like other industries such as car manufacturing. Less than half the UK population flies and yet everyone subsidises the aviation industry, as it pays no duty on fuel, VAT or green taxes. **Aviation is destroying the planet;** at what cost does the Government ignore the damage aviation has on climate change? Gatwick uses up carbon footprint to export leisure traffic out of the UK which brings little benefits to the UK purse or climate change targets; Gatwick would have the same impact on climate change as Heathrow whilst bringing the least into the UK purse as it specialises in exporting UK leisure travellers.

Aviation should be made to pay like other industries with a green tax, duty and VAT; the Government could receive an additional £11.4bn a year; the 1997 Treaty of Amsterdam had the principle of 'polluter should pay' however aviation continues to escape; the Air Passenger Duty raised £3.2bn in 2014/15 but ADP rates would need to be more than four times their current levee to match the value of the industry's blanket exemption from fuel duty and VAT; the Airports Commission own analysis indicates that to contain

aviation emissions within the limits recommended the Committee of Climate Change air fares would need to increase by an average of £63 by 2050.^a

We would add that it seems disappointing that airport and aviation growth is not viewed nationally to what is best for the whole country and not just impacting the southeast repeatedly with congestion and aviation growth.

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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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