

West Sussex and Surrey

## Response to Department for Transport consultation

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### Introduction

CAGNE, formed in 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 balanced voices are truly represented alongside industry.

**Government questions are detailed in blue.**

- [keeping pace with technology and developing skills for the future](#)

**The CAGNE 'Big Three' concerns in response to the Government's call for evidence 'Beyond the Horizon'.**

- 1 Environmental Concerns**
- 2 Air Quality**
- 3 Noise Strategy**

### **1 Environmental concerns**

It has been suggested that the Brits on outbound and then inbound aircraft are doubling the UK carbon impact.

We are concerned that the wording of much of the report is about 'tackling' 'addressing' environmental objections to achieve goals of aviation growth. A concern is also that aviation no longer accounts for 6% of carbon but 8%, this can only increase if aviation is not controlled.

We would like to see environmental concerns being top of the list of objectives and one that aviation has to adhere to and not unmitigated against. CAGNE would ask what are the environmental strategy in reaching and reducing carbon from aviation instead of marginalising the impact on the environment through the suggested policy.

The lack of stringent safeguards, not assisted by the Paris agreement which is voluntary, the fact that the findings of the climate change committee does not seem to feature in the suggest policy, are all of great concern when the policy seems based on one objective, to pacify aviation's desire for growth and that of low cost airlines.

We would strongly suggest that the UK government should be leading the way in reducing carbon by controlling the growth of aviation in the southeast where the burden of surface access and reduction in air quality are a major concern as rural areas can not have 'clean air zones' as towns and cities but are reliant upon roads networks to conduct daily life of work, school, hospital, GP visits, shopping, etc.

## **2 Air Quality**

### **What is the cost to the NHS for aviation noise and emissions it creates through surface access and aircraft?**

In the past 2 years Gatwick has breached EU air quality levels and the air passing through the airport is deteriorating. Due to the wide spread lack of public transport, poor rail (Brighton Main Line) this factor can only increase. EU guidance is to improve air quality and not reduce air quality. Initiatives such as Clean Air Zones do not work in rural areas, which surround Gatwick as there is a lack of any public transport and thus cars have to be used to access school, work, shops and Gatwick.

Only about 45%\* share of public transport is used to access an airports.

Big traffic generators, ie airports, must play their role in reducing the risk of poor air quality through the traffic they generate as well as pay the price of using the highways and railway.

Environmental Agency of Crawley Borough Council, the adjacent council, detail air quality levels below  $40 \mu\text{g}/\text{m}^3$  in various places, they are relatively high when taking into consideration that Gatwick has no alternative than to be

accessed by road due to lack of east to west railway and being positioned on the Brighton Main Line that can't be expanded.

*Crawley Borough Council have three sites (in Crawley) in Poundhill I: St Hilda's Close - alongside the A2011 (26 ug/m<sup>3</sup>) Ferndown - alongside M23 Junction 10 slip road onto A2011 (25 ug/m<sup>3</sup>) Headley Close – long-term background site (22 ug/m<sup>3</sup>) Other sites in the vicinity are Saxon Road, Worth (27 ug/m<sup>3</sup>) and Bolton Close, Maidenbower (24 ug/m<sup>3</sup>) both of which are adjacent to the M23 and Hazelwick Avenue, Three Bridges, (36 ug/m<sup>3</sup>).*

Air quality has to be linked to lack of surface access for Gatwick, although Gatwick says onward surface access is not their problem, it is that of local authorities and residents and CAGNE would question the cost to the NHS and local authorities.

An airport may be able to reduce the emissions onsite and in airport operations but it has to concede responsibility for reducing air quality due to taxis, drop off areas, congestion on roads, and the impact on the infrastructure road network.

Land take, removal of trees; all contributes to the reduction of air quality and the demise of air quality impacts wildlife habitat and the environment.

### **3 Noise Strategy**

**There would seem no independent body responsible for protecting communities from noise and thus new protest groups evolve due to lack of governance of the impact aviation noise has on those on the ground.**

- CAGNE sees no consideration of those impacted by routing that is offered no respite. For example the CAA PIR Review ignored those that suffer multiple routes, it only dealt with departures with PRNAV. It ignored the increases in PRNAV movements over the same areas with multiple routes from Gatwick, Heathrow, Stansted and arrivals offering no respite.
- If Aviation Policy Framework (APF page 55) is that benefits should be shared and noise reduced and mitigated, then we see Gatwick as non compliant. Communities surrounding Gatwick have witnessed huge increases in noise from PRNAV, 7.7% increase in passengers, and yet no limits on aircraft movements or consideration of those that suffer Gatwick the most with no respite has been addressed. Although Gatwick's continues to profit with a 12.9% year on year growth for shareholders.

This would illustrate that the current policy is not stringent in safeguarding communities from International Corporation that own airports and seek to serve shareholders.

- CAGNE would object to NPRs being removed as residents purchased homes knowing that aircraft would not overfly them and thus often paid a premium price.
- We would question the expression 'respite' in section 7.3 as to the governments meaning of this phrase. Respite can mean many things to different people and clarification of the governments view is sort.

CAGNE thinking it is similar to traffic lights at a roundabout when there are too many cars. The ramifications of any change to airspace must be viewed by the bigger picture and not individual routing which could have consequences on other areas, for example Gatwick continues to review arrivals and singular departure routes with the CAA guidance on Route 4 suggesting moving traffic on to other routes that suffer increases in departures, multiple routes and arrivals. The Gatwick NMB continues to ignore those that do not have any respite from aircraft noise.

- We would also endorse restrictions of how many planes per hour an area/ route can be impacted by. This is stated as Gatwick has allowed 2015-16 a 3% increase on singular routes and reductions on other singular routes but on routes that receive no respite they have witnessed a 8% increase in departures (CAA data) as well as arrivals whilst being impacted by Heathrow, Stansted and Gatwick arrivals to the east of the runway. CAGNE are awaiting CAA figures for 2016-17.

#### Questions on the Aviation Strategy's aim and objectives

4 In what order of importance should the policy challenges listed below be tackled?

Please tell us why you have suggested this order of importance.

#### Policy challenges

- keeping pace with consumer expectations
- maintaining high levels of safety and security
- expanding our access to markets and trade
- encouraging competitiveness
- meeting increasing demand through sustainable growth

- **Consumer expectations** - The report seems to focus on growth without outwardly considering the ramifications of leaving Europe and the changing world in which we live in, both climate change, financial and terrorism.

The policy seems fixed on ensuring that the consumer, that already benefits from an industry that pays not VAT or duty, is the major beneficiary over that of communities and environmental damage.

- **Coastal Regions** - Today's travellers worry about whether they'll be charged more than the flight for an extra suitcase in the hold, or if they

will lose their bottle of water or make-up cream at security since the threat of terrorism has reared its ugly head.

Holidays and package holidays have evolved and the low prices (and the sunshine) have made going abroad a more tantalising option than holidaying in the UK. This has been to the detriment to our coastal regions and many UK seaside towns' economies were badly affected by the advent of cheaper foreign travel in the 1970s. This led to a depleted economy in these communities, low skills base and "dangerously high levels of family breakdown".\*\*\*

From CAA figures it shows that 58% more British passengers fly out than foreigners fly into the UK.\*\*\*\*\*

Since then our own UK-based holiday industry has suffered and continues to decline, and now it faces a policy that seeks to encourage more people to holiday overseas, away from the UK coastal regions bringing much needed revenue into these regions.

A Centre for Social Justice 'think tank' report commented on coastal regions saying: 'living standards in some of the UK's best-known coastal towns have declined "beyond recognition" and locals were now "bearing the brunt of severe levels of social breakdown.....We must ramp up efforts to revive Britain's coastal towns, not just for visitors but for the people who live there".\*\*\*

Since 2012, the government has invested £120 million in coastal projects through a dedicated Coastal Communities Fund.\*\*

In 2014, the Government undertook a campaign to promote our coastal holiday areas to UK residents, and also heritage sites, National Parks and Areas of Outstanding Natural Beauty. "Stay at home and enjoy the natural richness of our country", was the slogan. While facilitating just the opposite, by this paper as it seeks to give the consumer more opportunities to fly out of the UK.

- **Safety** - As airlines cut costs to make savings, it must be questioned where safety factors into the airlines calculations. Cabin crews are increasingly expected to undertake additional roles, for example EasyJet undertake the cleaning of aircraft between flights. The ground crew are giving unrealistic short turnaround times to meet airlines desires for greater number of flights and turnarounds during the day and night, this must only raise safety concerns.

As for runway capacity, CAGNE would suggest that Gatwick's desire to be the busiest single runway in the UK is concerning. If the desires of an airport are put before that of passengers and communities we would have concerns about the number of arrivals and departures Gatwick are endeavouring to operate through a single runway to receive maximum slot fees.

We are concerned that profits of the aviation industry are coming before sound safety concerns.

**European Factor** - Brexit could be an opportunity for the UK Government to introduce Frequent Flyer tax to replace Air Passenger Duty as the 'flyer must pay for the noise and emissions they create.' It could also be suggested that aviation pay a green tax. Only 15% of the population flies leaving the rest to compensation the flyers by subsidising fairs.

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It is understandable that Gatwick supported the 'Remain' campaign as it is very much reliant upon Europe with nearly 90% of all flights going to EU countries.

In July 2016 another casualty of Brexit was a Gatwick-based/ Europe holiday booking company, Lowcost Travelgroup, which went into administration as uncertainty ahead of the EU referendum and the fall in the pound were blamed for its demise.

The group left 27,000 holidaymakers in resorts and 110,000 more with bookings. Because it is not ABTA assured, being based in Europe, these travellers have serious concerns as to whether they may not receive any refunds.

The administrators said 60% of customers were British, and that factor were: *"...the increased terror threat and the uncertainty before and after the recent referendum"*.

The Brexit factor is still relatively unknown but with the increasing number of airlines moving overseas to ensure routes, with the threat of increases in prices, we would comment that the government's expectation of growth to be over confident.

*"The airline forecast today that its capacity and traffic growth in Britain will slow to about 6pc in the 12 months to March 2018, down from an expected 15pc this year. .... Mr O'Leary said that Ryanair had planned for "double-digit" growth if Britons had voted to remain in the EU. However, Ryanair now expects to fly about 44.5m passengers in and out of the UK during its next financial year instead of the roughly 50m it had forecast before the referendum, and will focus its expansion in countries such as Germany and Poland instead.*

When referring to economic gain, the cost of the impact of aircraft noise, day and night, is not balanced as it provides no costing's of the illness caused to by aircraft noise to NHS or loss of work hours to industry from sleep deprivation.

- **Non Sustainable Growth** - We would ask policy to consider the fact that flights costing £19.99 to Poland are unsustainable as is flying to

America for £134 one way. These passengers are benefiting from a highly competitive market but also one in which airlines are operating at very small margins reliant upon low cost of fuel, low landing charges world wide, cutting margins such as having cabin crew clean planes during turn around whilst charging for luggage in the hold, and inflight food and drink.

Gatwick boasts of Norwegian Airlines growth but how reliant is this low cost carrier? Moody\*\*\*\* for 2017 has downgraded them, so where is Gatwick's growth coming from?

Package holidays of the 1970's started the decline in coastal regions and by setting a policy that encourages outward transfer of UK money and passengers. More UK passengers fly out of the UK than foreign ones entering. We would ask if this is a wise policy as the government has to fund coastal regions, as they cannot compete against the package holidays or low cost flights – 'stealing from Peter to pay Paul

- **Modernisation of airspace** - We accept planes are quieter than some 40 years ago but the frequency of planes has vastly increased and this combined with no respite from day and night movements at Gatwick causes significant noise issues for residents.

Modernisation of airspace would seem a fixed agenda for the government but we would ask that the ramifications of changing one airspace be combined with that of another, we sight the changes made to City Airport which has caused a huge increase in routing over the west of the country as well as more planes joining the holding stacks from the south. Planes use to join the ILS from the north prior to LAMP 1.

We would see the Government putting in place safeguards that airport movements and passenger numbers are controlled as large planes increase. We see this in relation to pressure on .as well as noise as planes should be getting quieter but with add freight and frequency are still a major issue.

## Aim and objectives

5 Aim: To achieve a safe, secure and sustainable aviation sector that meets the needs of consumers and of a global, outward facing Britain

The strategy will have the following six objectives:

- help the aviation industry work for its customers
- ensure a safe and secure way to travel
- build a global and connected Britain
- encourage competitive markets
- support growth while tackling environmental impacts
- develop innovation, technology and skills

- **Employment** - Growth in the employment market – we see this as questionable as airports are moving to computerisation and thus less low skilled workers will be required. Computerisation of baggage handling, cleaning of aircraft by cabin crew and check-ins are all become computerized and reduces the need of staff. Planes are increasing in size as they carry increased numbers of passengers which results in fewer cabin crew and pilots also a reduction in the number border staff can be witnessed as eye recognition is introduced and other computerized initiatives. Even at Air Traffic Control we will see a reduction in staffing, as this becomes computerized and less staff are needed to control airspace due to the modernisation of airspace.

*‘It is notable that the dramatic expansion in passenger flights, has not been accompanied by an increase in the number of jobs in the sector. According to research conducted by campaign group Stop Stansted Expansion, jobs per 1,000 1,132 in 2008, deregulated industry, the formula that increased amounts of air traffic leads inevitably to job creation cannot be assumed as cause and effect, indeed the signs are that the opposite is likely to be true.’*

[https://www.pcs.org.uk/sites/default/files/site\\_assets/group\\_websites/aviation\\_group/2017/Heathrow-%20climate%20and%20trade%20unions%20report.pdf](https://www.pcs.org.uk/sites/default/files/site_assets/group_websites/aviation_group/2017/Heathrow-%20climate%20and%20trade%20unions%20report.pdf)

- **Reduce Carbon** - We would strongly suggest that allowing Gatwick, or any other airport, has ramifications on the surface access and other regional airports and would endorse allowing people to fly from a local airport and so reduce the carbon footprint of every passenger and at the same time allowing people to work locally and in so doing bring benefits to many communities rather than forcing work force to travel out of areas to seek work.

For example;

Southampton, Bournemouth airports, to name just two, could be badly impacted by Gatwick’s continued growth as airlines are enticed by low landing fees at Gatwick which could result in workers being forced on the roads to find jobs at Gatwick and so increasing the emissions and road congestion of every traveller.

- Southampton passenger numbers are expected to grow from 1.84 million in 2005 to 3.05 million per year by 2015, to 6 million per year in 2030.
- Bournemouth Airport details that they will have 4,500,000 passengers and 39,000 ATMs by 2030.

<http://mag-umbraco-media-live.s3.amazonaws.com/1010/masterplan.pdf#00>

- **The EU Factor** - *The European Commission’s proposal to continue exempting flights to and from Europe from its flagship emissions trading scheme (ETS) was an overreaction, writes Andrew Murphy of Euoractiv Sept 2017*

*Andrew Murphy is aviation manager at Transport & Environment (T&E), a sustainable transport NGO.*

*Climate action is easier when everyone pitches in. The alternative, to grant opt outs or special privileges, just burdens the load for everyone else. But this is precisely the problem we face with aviation and climate change, though MEPs have a chance to start changing this in a vote in September.*

*Aviation has always enjoyed special treatment. Despite its considerable and growing climate impact, the sector remains exempt from fuel taxation, exempt from VAT, most of its emissions are exempt from EU ETS or any other form of climate regulation. Moreover, the European Commission continues to champion its unbridled expansion, with scant regard for the climate impact. In fact it was the EU's role in liberalising the sector, without introducing measures to compensate for its climate impact, that has caused its emissions to grow. Aviation emissions have doubled since 1990, and now account for 4.5% of total European emissions. And those emissions are expected to grow and grow unless decisive action is taken.*

*With such growth, and with Europe as a climate leader, you would expect that the EU would be pushing for the strongest possible action. However in February this year the Commission proposed to continue exempting flights to and from Europe (equal to 70% of all Europe's aviation emissions) from its flagship emissions trading scheme (ETS), this time indefinitely. They did this in response to the UN's International Civil Aviation Organisation (ICAO) deciding last October on the broad outlines of an offsetting mechanism for some of the emissions from the sector.*

We quote the above article as an illustration that to allow Heathrow and Gatwick to expand would breach the new ICAO emission targets.

Gatwick continues to grow and so increases its carbon footprint but this does not seem to factor into the government equations on climate change. Gatwick states they will seek a second runway with Heathrow expansion and so we have to ask what are the ramifications on other regional airports and climate change?

If Heathrow and Gatwick are to expand then surely this will result in a reduction of capacity at other airports, reduce the capacity of northern airports and so force workers and travellers south.

Internal flights simply increases the carbon footprint whereas trains would reduce the carbon footprint of every passenger, for example Transform Scotland report that market share for rail travellers between central Scotland and London rose from 20% in 2005, to 33% in 2015, with reduced use of air transport.

Transform Scotland consider that a 50% share for rail is achievable by

2023....providing the relevant governments etc., take appropriate action...

See: <http://transformscotland.org.uk/a-green-journey-to-growth/>

- **Innovation** - CAGNE welcomes any innovation that reduces the impact aircraft has on communities below and the environment but there should also be a balance whereby innovation is not seen to overcome concerns about impact on those on the ground or the environment.

For example Gatwick produced a document (IMM03) for local authorities suggesting that if they build houses near the runway they should have windows that do not open and air conditioning. This is totally unacceptable as those that move to rural areas do not wish to be trapped inside houses and not able to use the outdoor spaces, we use the example of Forgewood, Crawley, which, by design, has outdoor areas of activities, cycling, walks, countryside.

[Questions on the policy making process](#)

[6 The strategy's policy principles are:](#)

[Strategy principles](#)

- [consumer focused – it will put passengers and businesses at the centre of everything we do](#)
- [market driven – it will emphasise the role of government as an enabler, helping to make the market work effectively](#)
- [evidence led – it will target intervention on specific problems which government can address, avoiding activity that does not respond to a clear problem](#)

- **New taxation** - CAGNE would like to propose that the Government put in place taxation or policy that prevents old planes returning to the runway. We see this as a quick fix in reducing noise and carbon. At present planes can be put back on the runway even though they are over 20 years old, do not have modern technology, short of parts, not as clean and are very noisy for local communities. We see a perfect opportunity for the Government to lead the way in opposing sanctions on such aircraft flying in and out of the UK.
- **Disruptive passengers** – is fueled by airlines selling alcohol on planes. Airline crew are assisting in this factor as airlines seek to operate a full shopping experience on board. CAGNE would submit that higher taxes should be forthcoming to reduce drinking on the planes as before when airports have, on average, a captured audience of 2 hours in the terminal – let the Government profit and not just the airport and aviation.
- **No 2<sup>nd</sup> runway at Gatwick** - We request that no expansion of a new runway be entertained at Gatwick due to the ramification it would have on noise over rural areas, the demise of green areas due to mass

housing, land take and runway itself, and lack of funding for surface access or rail links.

We request that the land set aside as the strategic gap between Crawley and Horsham now be released back into the local authorities hands and so the blight on homes and communities threatened by a second runway be removed.

- **The User Must Pay** - Gatwick 2017 is lobbying Government for funding for the Brighton Main Line, Windmill Junction. Gatwick acts as a bottleneck for the line preventing the line to increase capacity further down in coastal regions. The Windmill Junction improvements are to cost over £2bn and is planned without Gatwick expansion or growth but needed to meet population growth.

The £120.5m upgrade of Gatwick Airport train station with a new platform to benefit Gatwick - Gatwick will only contribute 7.5% towards the total cost.

**Rail facts** - Even after completion of the Thameslink improvement, the South East Route\* states there will be unacceptable standing from as far out as Haywards Heath and **by 2024 serious capacity problems overall** (SRS pp39-40). By 2018, with or without a new runway, the SRS states (p52) that **Gatwick passengers will be subject to significant congestion and standing on trains**. Page reference from South East Route: Sussex Area Route Study September 2015

<http://www.networkrail.co.uk/browse%20documents/strategicbusinessplan/cp5/supporting%20documents/our%20activity%20and%20expenditure%20plans/route%20plans/sussex%20route%20plan.pdf>

- **New technology** - Concerns would be raised about the increase of drone taxis and the noise they will create for communities at far lower intrusive heights. We also question the legalities of flying over people's homes without permission.

Also the increase in helicopter over rural areas due to congested roads. At present we see no safeguards to prevent the invasion of helicopter noise over those that live in tranquil areas or that are impacted by an airport routings. Only over London are there restrictions of helicopter movements. We would like to see similar restriction imposed on this sector as well as that of private jets which is set to increase eg this is TAG's growth forecasts

- **Fuel** - In 2014, Sustainable Aviation published a Road-Map to demonstrate the opportunity to develop and introduce sustainable jet fuels. This analysis has shown that the use of sustainable aviation fuels in the UK can contribute to a reduction in CO2 emissions of up to 24% by 2050 for the aviation sector as well as significantly reduce particulate emissions.

We question the feasibility of alternative aviation fuels and ask if we should be seeking to encourage more low cost flights that damage the planet and UK economy? Unsubstantiated pledged by an industry body includes:

*Independent research conducted for SA indicates that a domestic industry for the production of sustainable jet fuels could provide between five and 12 sustainable fuel plants throughout the UK, generating a Gross Value Added (GVA) of up to £265 million a year by 2030 and support up to 4,400 jobs.*

*Since 2014, SA and the UK aviation industry has been working with UK Government and Innovate UK to review and enhance incentives and policies to realise the opportunities for sustainable jet fuel production in the UK.*

- British Airways planned to produce fuel from waste but this was shelved due to expense of producing such fuel.
- August 2017 Norway detailed that they would produce 30% of all jet fuel from forestry but it would seem the commercial technology to do so is not available and would require imports to produce the 400m litres required by 2030. CAGNE has to question how this is good for the environment to remove vast amounts of woodlands that clean air to facilitate low cost airlines to profit whilst damaging the environment?

What are your views on the proposed principles?

7 The policy tests for the development of the strategy are:

Policy tests

- What is the rationale for action?

This will remain focused on what the government is trying to achieve, not just in terms of outputs (such as the publication of an Aviation Strategy), but the final outcome for the sector and society.

- What is government's role?

This will look at the need for government action to fix an identified problem, or whether activity is better carried out by others.

- What does the evidence say?

This is a test of whether the government is using the best available evidence and whether there is anything that could be done to improve the information and data available to decision makers.

- Have all of the options been considered?

This will ask whether there are other approaches that may not have previously been considered.

- What is the effectiveness of any proposed action?

This will ask whether government has considered the practicalities of policy decisions and if these have been properly discussed with those affected or who have an interest.

## Specific question on utilising existing runways

8 What are your views on the government's proposal to support airports throughout the

- UK making the best use of their existing runways, subject to environmental issues being
- addressed?
- Questions on the consultation process
- **Decision makers** - We would strongly oppose local authorities or even the airport being in control of anything to do with aircraft routings, quotas and noise. Localised solution may seem logical but it simply enables the airport to pitch communities against each other, as is the case with Gatwick and the NMB.

The local authorities close to Gatwick are not over flown and thus have no idea of the impact of aircraft noise. At a time when local authorities are crying out for funding there is an incentive for them to allow an airport to grow as they receive and negotiate the S106 money.

To allow an airport to control such matters would be disingenuous to all the taxpayers, as they would be trapped underneath flight paths changes/ new routes with no recall. For example Gatwick assured residents in February 2014 that ADNID was a trial departure route. The route then appeared as a departure route off a new runway and as three routes in LAMP 1 document.

Airports simply cannot be trusted, they have a vested interest in maximise profits for shareholders by maximum usage of the sky at any cost to communities – Gatwick continues to illustrate this via the NMB and the fact that they will push for a second runway with Heathrow R3.

- **Rural Areas** - Rural areas must be considered separately to those of urban areas when consideration is given to night and day aircraft movements.

CAGNE appreciate the new N60 and N45 but feel these do not go far enough in addressing the fact that rural areas are significantly impacted by aircraft noise per event compared to urban areas that absorb noise and has higher levels of ambient noise.\*\*\*\*\* It is documented that rural areas suffer aircraft noise 10dB more than urban areas.

We would also ask that consideration be given to those that are impacted by more than one airports noise below 10,000ft especially in rural areas as aircraft at 7,000ft still have a significant impact.

- Night Flights are a major issue and cause sleep deprivation for many, as do early morning movements especially departures in the

shoulder periods. This is well documented by many medical research bodies.\*

We believe the current push to have charging of landings and departures at night increased is a step in the right direction, but do not believe that airlines will be swayed to stop using night slots solely increased cost. The Government needs to reduce night movements and ban departures from 11.30pm-6am in the winter and summer schedules at Gatwick. Obviously some airports, such as Heathrow and City, are fortunate not to have night flights.

Gatwick fails to charge aviation for the disturbance it causes, CAP 1576.

We would like to see the ICAO aircraft noise categories up dated so that older planes fall into a category that limits their flight.

Night movements must be restricted and the fact that the Government has chosen in their recent night movements to allow Gatwick to grow during the winter months is very disappointing for local residents especially as many receive no respite day or night from multiple routes over rural areas.

- CAGNE would suggest that as aircraft become less noisy, eg Neo planes, that the number per routing is not increased, as it is the frequency of planes that causes issues. Larger planes have slower climb factor and so increase the noise footprint.
- The introduction of PRNAV on departure routes and the poor scheduling of night landings by Gatwick have not assisted in reducing noise. We would ask that policy ensures that airports have to take into consideration CAP 1498 when planning routes and the noise shadow from PRNAV routes is far greater than that of the old dispersed system.
- We would like to give preferential consideration given to those that suffer multiple routes and ground noise below 4,000ft especially in rural locations.
- The policy should include stringent safeguards for communities and local authorities to control the number of aircraft movements and number of the passengers an airport is allowed to grow to.
- We would also endorse restrictions of how many planes per hour an area/ route can be impacted by. This is stated as Gatwick has allowed 2015-16 a 3% increase on singular routes and reductions on other singular routes but on routes that receive no respite they have witnessed a 8% increase. CAGNE are awaiting CAA figures for 2016-17.

- Noise also has an impact on the environment, wildlife behaviour, habitat, as does light pollution from an airport and aircraft.
- **Who will pay the compensation?** In the case of a new motorway, the Land Compensation Act provides full compensation for any loss of property value plus 10% (increased to 25% in the case of HS2, and the third Heathrow runway). That is applicable at any distance from the new development, and is not linked to the installation of double-glazing, or the sale of the property. So who pays the compensation for increased capacity and noise at Gatwick?
- **ICCANA** – CAGNE asks that this organisation has ‘teeth’ to control aviation and helps communities. It should not become another research body like the CAA, Defra, DfT, gathering more data only to be shelved.

ICCANA must be permitted to ‘I can’ and not ‘I can’t’ as it is seen at present. We would see this organisation as working as an ombudsman, deciding on compensation for house owners that can prove loss of value due to increases in aircraft noise with or without a new runway.

- **Airports growth must be controlled** - Currently we see Gatwick uncontrolled as passenger numbers have increased by 7.7% up to 45m 2017 with their aim of 50m. No funding or offers of funding are forthcoming from Gatwick to cover improvements to highways or rail to accommodate this growth in passengers endeavouring to reach Gatwick to fly out of the UK. This is, and can, only result in creating more issues, congestion, decline in air quality, as Gatwick is surrounded by country lanes, B roads, A roads and only has one major access road which will be at full capacity by 2040 through natural southeast growth.

Larger planes also bring increases in freight, Gatwick has seen an increase of 16%, and this can only access Gatwick by road, so we raise the issue of added congestion and pollution from the road network for local communities on top of the burden of aircraft noise below 4,000ft and pollution of both.

Gatwick details that onward surface access is not their problem but it must be that of local authorities and thus the government and so we would ask that policy have stringent safeguards in place that airport are forced to finance and control emissions in a far great footprint.

We re-iterate, the policy should include stringent safeguards for communities and local authorities to control the number of movements and number of passengers and airport is allow to grow without breaching set figures.

[Questions on the consultation process](#)

9 This document sets out the questions that the government would like to explore in developing the Aviation Strategy, within each of the six objectives that have been identified. These can be found at the end of chapters 3-8.

Are there any other specific questions on the six objectives that you think should be included in the planned consultations?

- What is the climate change strategy
- Environmental concerns should not be ‘mitigated’ ‘addressed’, they should come first before aviation growth/profits
- Health costs of night flights and aircraft noise should be added into the equation against aviation income to the treasury
- Noise metrics that reflect the impact of PRNAV departures routes below 7,000ft, to incorporate noise events and noise shadows of PRNAV routings must factor into any consideration for routing or compensation. CAP 1498.
- Consider the impact of aircraft noise on rural areas vs urban when planning routing. Urban areas have higher ambient noise and thus are less impacted by aircraft noise; this is not included in policy or evidence.

10 Are there any other sources of information or evidence that the government should bear in mind when developing the strategy?

- Health costs of night flights and aircraft noise should be added into the equation against aviation income to the treasury

11 If yes, please give us some details of the sources of information or evidence.

- Noise metrics that reflect the impact of PRNAV departures routes below 7,000ft, to incorporate noise events and noise shadows of PRNAV routings must factor into any consideration for routing or compensation. CAP 1498.

12 Does the proposed timetable (set out in chapter 2), provide enough time to examine the issues in sufficient depth?

CAGNE feel the process should be halted and the key factor of the policy should be re-addressed to ensure environmental concerns, the CAGNE Big Three, are addressed from the outset as strategy is too heavily weighted in favour of the consumer and aviation growth at any price.

We feel that there has been unfair lobbying of government by the industry which communities cannot compete with and thus puts the UK residents at an unfair disadvantage, eg *‘The Airport Operators Association are excited to announce we are partnering with ITN Productions to produce a news and current affairs-style programme exploring the challenges, procedures and future of aviation and airports.’*

*‘The UK aviation industry is the largest in the EU and the third largest in the world, ‘Airport Matters 2017’ will bring this to life and showcase the innovations, people and skills that are driving this industry forward at a staggering pace’*

13 If no, please provide feedback on the timescale here.

As above, question 12.

14 What action could the government take in order to ensure that the maximum number of people, communities and organisations are engaged in the process and are able to have their views heard?

Work with all communities and not be selective to who sits on CAA and DfT groups as is the case at present. This behaviour leads to mis-trust of the process.

We would recommend national workshops/ seminars for communities to attend and the DfT to receive feedback about environmental concerns.

15 Would your organisation be willing to take part or help organise events to help the development of the strategy?

Yes, we would welcome such a move by the DfT

16 Are there any issues which we have not covered in this document which you think should be included in the consultation process?

Yes

If yes, please describe what you think these issues are.

Aircraft noise impact on rural areas and night flights.

Other comments

17 Do you have any other comments on the issues raised by this call for evidence? If so, you can either give these in your response to this consultation, or in the themed consultations which we have planned for each of the objectives.

CAGNE would also comment that the timing, planning, of the process is a bit like 'putting the cart before horse', it would seem an illogical timetable of procedure that the government has set in motion.

We would hope for more stringent regulations on aviation to control its growth and the damage it causes on the environment and communities health and wellbeing.

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