

Fair and Equitable Distribution (FED) response on meeting 16th February, hosted by Manchester University and Anderson Acoustics

25th February 2023

CAGNE opening questions -

Is it FED to ask residents – ‘is it fairer to fly over lots of people, sharing the noise load, than flying over a single route of concentrated planes?’

Is it right that residents that have never been overflowed are going to be subjected to FED without being:

- 1) fully engaged
- 2) informed about what this actually means, i.e. the noise impact on house value and wellbeing
- 3) informed about what it means to be overflowed by departures?

The mapping shown by the organisers illustrates how aviation is already seeking to mislead and fly over new communities to facilitate growth, without truly informing those to be newly-overflowed about the full impact of such a FED study. We therefore concluded that the study is to facilitate aviation’s desire for growth through FASIS/ FASIN.

CAGNE must ask how is this FED study fair to all communities when, predominantly, those currently overflowed are being engaged at various airports outweighing the number engaged that could be newly-impacted, to facilitate respite, growth of routes and capacity?

History of FED

FED was brought forward by noise groups within the NMB seeking to move noise over others. This was the case with the study brought by these noise groups (GACC/ GON/ PAGNE/APCAG) to reduce the join nearest to the runway to lower than 8nm – ILS study had found those closer to the runway would be newly-impacted at low heights.

The FED study was non-conclusive, so pressure was placed to take the FED research further by noise groups. This resulted in the current study, funded by the sponsors (Gatwick Airport) and the CAA.

CAGNE has been clear that it does not support FED, as its focus has been purely on moving noise over other communities to allow for aviation growth and respite (to facilitate growth) for those currently impacted by designated flight paths (NPRs departures) and swathes (arrivals).

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FED is now to be fed into FASIS (FASIN), which is a major concern for communities, as the modernisation of airspace is purely to benefit aviation and not those on the ground, nor the planet, as it offers no compensation for house devaluation or reduced quality of life, and more CO2 will be released due to increase in ATMs.

Gatwick Airspace

The study does not seem to wish to address the facts. At Gatwick, the west receives 70% of departures plus all the ILS traffic. Areas have departure routes 3 and 4 that then disperse along NPRs. The same route is taken by arrivals to the South, with joins to the ILS at 8nm, 10nm, 12nm, plus direct in at 14nm. Departures in the west cannot climb, due to Heathrow airspace and Gatwick arrival traffic that have increased in the west due to changes made for modernisation of City Airport airspace.

Departure routes 4 and 3 do not generally have arrivals over them. We have seen Plane Wrong, and a parish council seek to move traffic from this route over those that already suffer departure routes 3 and 4 plus all the ILS in the west.

In the East, the departure routes can climb, except for route 2 that is trapped under the arrivals.

The East predominantly has arrivals 70% of the time. The departure routes and ILS is the same route, until approx. 6nm when it disperses onto departure routes (NPRs) and a higher ILS route, so not the same routing as the main easterly departure routes.

Totality of noise has never been a consideration for an airspace change, or summary of noise impacts.

Meeting

In attendance – two representatives from Anderson Acoustics (one having worked for GACC noise group) and one from Manchester University.

GON/ GACC – Kent (arrivals)

Plane Wrong/ GACC – North Holmwood (departure routes 3 & 4)

GACC noise group – Charlwood and Kent

PAGNE – Plaistow and Ifold (arrivals)

CAGNE – umbrella aviation community and environment group for Sussex, Surrey and Kent

Simplistic questions were put forward –

- What does 'better' look like? In a room of those overflown, the answer is clearly 'not to be overflown'.

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- What does 'worse' look like? Again, in a room of noise groups the answer is clearly 'an increase of planes overhead.'

As such, there were questions seeking answers to 'dispersal vs concentration'. These are seen as loaded questions to facilitate the reply of 'multiple routes to appease aviation's desire for growth' – impacting more people, which will result in creating new noise groups and more anger towards aviation and government (£9.2m taxpayers' money paid to progress FASIS/FASIN).

- CAGNE was not surprised to witness suggestions put forward by the host to seek to fly over new communities. Without having equal representation in the room to speak for those residents that would be newly impacted, we do not see this research as solid foundations on which to base airspace change, as proposed – to feed into FASIS/FASIN.
- The presentation used the Heathrow noise group campaign to give respite with multiple routes - a rotation of runways and routes to give predicted respite to residents around Heathrow. It would seem, from the presentation, that they have adopted the Heathrow noise group campaign, taking it forward to allow respite and growth at any price – the price here being rural communities (reducing the number significantly affected by aircraft noise). In this way, noise groups are facilitating aviation's desire for growth.
- Various questions were asked to ascertain attitudes towards airspace change at Gatwick Airport, leading us to believe that the study is seeking wide sweeping answers to facilitate key points in a FED report.
- The conversation highlighted negativity towards the airport, the airspace change process, the CAA and government. It was particularly vocal towards changes made in 2014:
 - on arrivals (join moved from 8nm to 10nm to offer stability in flight) – that has now been returned to the pre-2014 joins to the ILS.
 - the departure trial in February 2014 over new communities in West Sussex called ADNID, and at Heathrow over Ascot.
- **The routings shown on the departures** (even if fictional) imply that planes fly computer generated lines and that the only impact on the ground is under those lines. This is not the reality of how planes fly. It is being suggested that there is a swathe that these planes fly within. This is not true. Planes fly within the noise preferential route (NPR) until a set height, whereby air traffic control can vector to a more direct route if airspace allows. This is not a set routing. If this was a set route flown on a regular basis, it would have had to go through a CAP1616 – as such, this 'swathe is fiction' and should be removed from diagrams.

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Dispersal inside the NPR is what was offered historically with ground based navigation.

A line on a map does not show the true impact on residents (ADNID illustrated this, as do RNAV routes flown today out of Gatwick). RNAV routes can cover 3-5nm either side of the route, allowing those on the ground (a noise shadow/cone) to feel the full impact of the direct route. See CAP1498???????

RNAV routes do not necessarily fly as a single route; we offer Route 4 dispersal on the turn as an example of this.

Arrivals are different, as they have not had any RNAV routes introduced. Arrivals have historically flown subject to height over a swathe of land. Residents have therefore had a dispersed routing of planes, with no concentration at the ILS joining points.

We expect, as with the NMB that was dominated by arrival noise groups, to witness a push to have arrivals moved over those closer to the runway, with no consideration to the height or frame noise (turning/ vectoring planes increase noise). A shorter distance to go to land increases the pressure on the pilot to take speed off quickly at a lower altitude, which increases the noise on the ground with wheels down early and flaps used to take speed off, so increasing noise by 3-5dB (studies at Heathrow, Luton and Gatwick).

The film

The voice-over is too quiet and insipid.

The film must be clear that departures have RNAV routes inside the NPR. The NPR history must be explained that they were put in place so residents knew where departing planes would fly in the 1940's (80 years ago). Residents would have paid a premium not to be under a flight path/ NPR.

Arrivals are very different from departures; this needs to be made clear. Residents already overflowed by arrivals believe they already have RNAV routes – this is not the case.

- Arrivals approach the ILS dependent upon entry into UK airspace and holding stack. Arrivals used to join the ILS from the North, prior to the changes made to City Airport airspace in 2014/15 which had the knock-on effect of removing this arrival route, bringing more arriving planes down the west side of the UK.
- Arrivals are conducted in a swathe with height restrictions and tend to be dictated by where they enter the UK airspace or travel from the holding stacks.

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- Timed Based Arrivals are suggested (as proposed by FASIS/FASIN) – these will enable pilots to know their join to ILS at the point of departure, enabling speed to be taken off over the sea. As we witness planes conducting CDO with little consideration of the impact that lowering height early has on the ground, we do not believe TBA will work for residents.

The mapping shown by the organisers illustrates how aviation is already seeking to mislead and fly over new communities to facilitate growth, without truly informing those to be newly-overflown about the full impact of such a FED study. We therefore concluded that the study is to facilitate aviation's desire for growth through FASIS/FASIN.

We do not believe residents will understand or appreciate the noise they will be impacted by, if they answer standalone questions such as 'do you think it is fair and equitable to share the routes rather than concentrate over a set area?'

The film must make it clear that there is no compensation for those newly-overflown.

The organisers seem to want answers to single questions to facilitate results. If attendees are only asked 'is it fairer to fly a concentrated route over a few or a dispersed route over many' logic would say 'over many'. Without understanding the full context, the question is loaded.

We do not support the use of the Stansted example, as this was led by the noise group and impacted new communities that had less of a voice due to being rural.

Conclusion

CAGNE continues not to support this study as it purely seeks to facilitate aviation growth. There is no such thing as FED except what aviation and government believe in – unconditional growth facilitated by multiple new flight paths over new communities to allow respite for noise groups today.

It looks to fly over new communities whilst ignoring the impact this will have on them.

It offers no compensation for any residents newly-impacted.

It offers no way of illustrating how the noise will impact those on the ground.

This study facilitates the relaxing of consultation as proposed in the CAA CAP2496 on CAP1616, to reduce costs and time for aviation.

A computer line on a map does not account for people's lives, wellbeing or value of home being impacted by aviation, as we witnessed in 2014 with ADNID and the Ascot trials mapping.

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Since 2014, the aviation industry has learnt to put communities in boxes. Prior to this they did not engage. CAP1616 is a good example of the tick box exercises that the CAA and DfT now operate to facilitate aviation growth whilst ignoring the impact on the local environment and the planet.

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