

CAGNE response to the Civil Aviation Authority Consultation process of CAP1616

Deadline 18.12.25 - CAA CAP1616 – airspace change consultation process –

Concerns are that this again weakens the consultation process in favour of aviation growth and profits. <https://consultations.caa.co.uk/safety-and-airspace-regulation-group/airspace-change-process-2025/>

Q5 Disagree

To ensure a balanced approach and safeguard communities, these stages should be far more stringent, not removed.

This is seen as being too aviation-biased with a lack of community input. These are important steps in the process, in which residents should be involved. By using poor mapping and being disingenuous with the facts, Gatwick has shown a poor understanding of how to build a sound foundation for creating an airspace that can move forward with community support. This has actively prevented stakeholders from being informed and providing effective engagement. We are therefore concerned that what may seem a logical approach is, in fact, a route to removing those impacted by change from the outset. If anything, these areas of the CAP1616 process should be made more stringent, to ensure community understanding and achieve community support going forward.

Q6 Other

Keep as current with stage 1 and 2.

Q7 Disagree

This does not offer a balanced approach whereby communities, the planet and aviation each benefit equally.

This is far too focused on aviation growth, with far greater input from aviation that has a vested interest in growth at any price. We see no evidence of a balanced approach, as required by policy and ICAO.

Q8 Agree

There is too great a similarity to each, so they are both the same.

Agree but they both seem to be the same. There is no difference in what they desire, and this has no bearing on what communities want for protection from aviation impacts.

Q9 Disagree

This is removing local influence over the airspace that the sponsor desires for growth at any price to those on the ground. This would be allowing too great an influence of the sponsor.

This is removing the local influence over the airspace the sponsor desires for growth, actively preventing the catering for local areas/need. The logic behind concentration is seemingly to be able to be more precise with flight paths, yet there is no evidence that much consideration is being given to the impact on the ground. It would also remove all the new noise metrics that have been established at Gatwick Airport by communities, such as the low-level noise.

Q10 Disagree

How can changes be made to the CAP1616 consultation process in relation to noise metrics when the consultation has not yet taken place on Aviation Nautical Guidance (ANG) which will set the metrics to be used by the CAA and sponsors? UKADS is seen as a government-appointed tier of bureaucracy that is aimed at stopping the community voice and preventing a balanced approach for all parties.

Until ANG has been consulted upon and noise metrics set, it is hard to understand how the sponsor can be given such a free rein. Gatwick's area of engagement is limited to those currently impacted (noise management board/ GATCOM), with no outreach to anyone who may be newly impacted. Elected bodies/ members do not provide a clear vision of what communities desire or offer any true impression/ feedback of the impact an airport currently creates. Elected members tend to have a vested interest in the airport, namely, the sponsor.

Q11 Disagree

As said previously, stages 1 and 2 are important steps that have allowed communities to see how dominated and manipulated the process has been at Gatwick Airport, with poor consultative maps and detail.

Q12 Disagree

High level methodology may be key to pushing ahead with aviation desires, but it does not allow communities the input that should be present at every stage of the consultation process.

Q13 Disagree

Milestones may work for aviation through collation of data, but they do not provide hope for communities that a weakened CAP1616 will offer a balanced approach or transparency.

Q14 Disagree

As above

Q15 Disagree

The CAA is an aviation body that implements government policy. Policy does not always reflect what is best for communities.

The current final appraisal (PIR) has been criticised, with the CAA playing judge and jury to the process with a government call-in set so high that it makes it almost impossible for anything to be initiated by communities. What is now suggested offers even less in the way of allowing an independent challenge. We would like to see a body formed that can be seen as truly independent (ICCAN) from all aviation influences, to undertake a review that would last a year to enable communities not to suffer from a poor airspace change, where all parties can put forward a case for change.

Q16 Disagree

The metrics currently used do not reflect the impact aviation noise has on communities, on the ground. To weaken metrics further would be a retrograde step. Metrics need to reflect the true impact of noise events and the background noise and other noise impacts, so that true evaluation can be assessed and acted upon to reduce the harm of aircraft noise on communities.

Q17 Disagree

As above

Q18 Low noise metrics. Noise events instead of average of noise. Consideration of background noise to provide a balanced approach.

Q19 Disagree

UKADS is a government-appointed body that will not have the communities' interests at heart, so they are too biased towards favouring decisions that benefit aviation over communities. This offers a very unbalanced approach with policy the driver to allow aviation growth.

Q20 Disagree

At present, there are no signs that communities will benefit from UKADS. It must therefore be seen as another tier of bureaucracy offering no balanced

approach, specifically aviation growth vs. community impact. There needs to be an independent body that oversees this whole process to ensure there is a balanced approach and transparency.

Q21 Disagree

10 years is far too long a period for appraisal. 10 years is too long for residents to suffer the impact of a new flight path/changes without any compensation or removal of the impact/ airspace change.

Q22 Maximum of 5 years, ongoing for impact assessments and pauses in airspace change.

Q23 Unsure

It is impossible to judge this as the UKADS body is not currently known, its terms of reference are clear, and the committee formation is not known. If it is similar to ACOG, this will not be a trusted body as it was purely aviation-led. We believe this is an unnecessary expense, to facilitate aviation lobbying for unconditional growth.

Q24 Disagree

These metrics are out of date and do not reflect the impact of modern aircraft noise on communities below 4,000ft.

Q25 Alternative noise metrics should include low noise metrics, noise events, and background noise impact as a comparison to aircraft noise. Night noise should feature and carry heavy burdens, such as additional cost for night flying.

Q26 Disagree

Aviation is notorious at launching consultations over the Christmas or summer periods when elected members are not serving and families are busy. There must be an option to extend the consultation time allowed, to accommodate such situations.

Q27 Disagree

This section will come too late for communities to influence and that, as we have seen at Gatwick, pathways have been wrongly removed to allow for their desired routes to go forward unjustifiably. This is very dangerous suggestion and reduces the influence and trust this process will offer to communities.

Q28 Agree

All public should be involved, and it must be made clear that new areas could be impacted and that the government is offering no compensation to anyone.

UKADS does not seem to be the body that can offer this independently.

Q29 Disagree

The CAA, as a government body, should be transparent, so everything should be updated on the portal throughout the process, allowing for challenges from communities.

Q30 Disagree

Once again, this is weakening the process to benefit aviation over those impacted by aircraft noise and airspace change.

It states in the consultation document 'when necessary' which is an unacceptable term to use when it comes to public involvement in a process that could, and would, impact their wellbeing and house value.

Q31 Disagree

Who are the stakeholders? What recourse will they have on anything they disagree with?

Q32 A chance for legal challenge of any proposal should be written into the CAP1616 process before any review or implication of an airspace change.

Q33 Unsure

What is currently in place is the CAA playing 'judge and jury' throughout the whole consultation process, which has been unacceptable to communities. What is proposed would seem a step in the right direction, but simply to monitor gives no hope or opportunity for communities to detail the impact an airspace change is having on them so can't be accepted.

It may reduce the cost to aviation and the CAA, but it must be seen as a way of aviation ignoring the ramifications of airspace change on the ground.

Q34 Agree

Yes, communities must be able to challenge or stop an airspace change if deemed to have unforeseen or unacceptable impacts.

Q35 A greater involvement of communities in UKADS operations and the process.

A lot of time was spent in CAA meetings guiding the CAP1616 change from CAP725. This weakening process of CAP1616 to benefit aviation is seen as regressive. Although reducing the complexity and sectioning of the CAP1616 process was welcomed, these proposals are not.

Greater transparency is required and a balanced approach that does not purely favour aviation; neither seem to be offered by what is being proposed in this consultation.

Q36 Disagree

It should be reduced to 6 months. If adverse effects are felt by communities then the airspace change should be stopped with a maximum of 6 months, similar to how a trial works today. This allows for adequate time to obtain data, as with a trial.

Q37 Disagree

Performance Based Navigation is subjective as it can mean several things on the ground. This would suggest that tailoring of local needs is best met by a balanced community involvement. To remove local involvement and development would seem a regressive move.

It is understandable that aviation desires PBN/ RNAV for the computerisation of modern flying, but on the ground, this has serious ramifications, so can't be allowed to be mandatory and formatted.

Q38 Unsure

If it is for drones only. The issue is if drones are used to deliver mail, parcels, medical equipment, etc. Communities must know how many and what noise impact they will have. Criteria must be established for noise limits and number allowed to be flown at set times of the day, plus the safety aspect of hitting residents/ buildings/ vehicles established, as well as carrying public liability insurance. What type of drone, what speed will they be flown at, what power will they have, maximum weight to be carried, etc. This must all be in place to govern the flying of drones, as well as privacy laws.

Q39 Agree

There must be controls if this is to be allowed, to safeguard residents from noise impact and safety.

Q40 Communities must be the number one consideration in the airspace change process. At present from this consultation, it seems very biased towards aviation benefits, whether that be growth, speed of process or reduction in cost. PBN has huge impacts on the ground.

Locally tailored solutions must be included. If communities are to accept airspace change with negative impacts for them, then there must be compensation paid by those that benefit, namely aviation/ airlines/ airports/ government.

Q41 The community voice and the impact airspace change has and could have on more people.

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CAGNE is the largest umbrella aviation community and environment group for Sussex, Surrey and Kent.

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