

15th January 2026

airspacemodernisation@dft.gov.uk

Dear Airspace Modernisation Team

Subject: Aviation Navigation Directions and Air Navigation Guidance consultation for 2026

CAGNE is the largest umbrella aviation community and environment group for Sussex, Surrey and Kent. We comment on the above consultation and object to proposed changes in the Aviation Navigation Guidance 2026.

1. Start Again

To date, the airspace change process through the Civil Aviation Authority CAP1616 consultation at Gatwick Airport has been of poor quality. We ask that it should start again from scratch, to ensure transparency about what is proposed in the airport's desire for growth at any price to those on the ground.

They lacked engagement with the full scope of residents that could be impacted relying upon a small selected audience of stakeholders, many lacking an understanding of airspace (elected members) with no clear understanding of what was being proposed by Gatwick.

- 2. Environmental studies include noise impact**, so we strongly support that these studies, as well as research into the impact of light pollution on nature and those seeking sleep, be included in airspace change.

3. Noise must be a priority below 7,000ft

The proposal is to remove the importance of noise between 4,000ft and 7,000ft. Noise has a significant impact on communities at this height, so the wellbeing of communities exposed to such aviation noise should not be ignored by policy. Ignoring noise provides aviation with greater growth, allowing planes to turn away from departure noise preferential routes (NPRs) with steeper, noisier climbs, potentially over people's homes.

The Department for Transport has already advised ministers (obtained by FOI and confirmed by the DfT) that there will be no compensation for loss of house value with airspace change. It is fundamentally wrong that government proposes to pitch the hypothetical and unquantified reduction in carbon over noise impact on communities.

Of course, saving CO2 is important, but it should not be allowed to remove residents' voices from the ramifications on them of airspace change. With growth, as proposed, comes significantly more noise and more CO2.

4. Noise Preferential Routes on Departures must remain

For many years, Noise Preferential Routes have dictated the departure routes where planes fly. Their importance is as relevant today as when they were introduced. Their proposed

removal should be stopped, as it will mean, again, more vectoring over residents from 4,000ft and above. This will increase noise for communities and affect their wellbeing.

NPRs also provide the option of dispersal within a set corridor using new technology.

5. Airspace Trials

Trials should only run for 6 months, and not 3 years as proposed. Residents should not be used as guineapigs, to suffer the blight of house devaluation and decline in wellbeing, all for an aviation experiment.

Overall, the Civil Aviation Authority has a vested interest in aviation, which gives it too much power. We therefore strongly object to the proposals to give the CAA more powers over airspace change, which would reduce the community voice further by seeking to engage directly (predominantly) with local authorities. These bodies often have a vested interest and lack an understanding of the ramifications on the ground of airspace change to all communities.

We object to the way the new ANG seeks to place responsibility for increased capacity and associated increases in CO2 emissions elsewhere in the proposals, especially associated with the planning system.

6. It is noted that documents commented that emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality. This seems not to be substantiated with evidence (ultrafine particles from landing aircraft) as such we object to this wording.

If CAGNE can provide you with any more information on this matter, or further evidence on the current impact of aircraft noise and the weakening of the Civil Aviation Authority consultation process (CAP1616), please contact CAGNE at cagnetatwick@gmail.com.

Yours sincerely

CAGNE Committee

Est Feb 2014

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