

Consultation on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace

Summary report of consultation feedback

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A report to the Department for Transport

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Executive summary

This report provides a summary of the responses to the Department of Transport's Consultation on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace. The consultation began on 2 February 2017 and closed on 25 May 2017.

The Government wishes to support airspace modernisation in order to deliver benefits for the UK economy, as well as for passengers and for the communities affected by aircraft noise. There is a need to modernise the way in which UK airspace is managed in order to increase capacity to meet rising demand for air travel, and to support sustainable growth in the aviation sector. To this end, the proposals put forward in the consultation document are intended to address the challenge of balancing growth in its use with effective management of the local impacts of air travel - in particular noise.

It was a national public consultation carried out in accordance with the Government's Consultation Principles.

Consultation process

The consultation was owned and managed by the Department for Transport (DfT). OPM Group was commissioned to receive, collate and analyse responses to the consultation made via the website, email or the Freepost address set up for this consultation.

A total of 794 responses were received. 171 responses were from organisations [listed in Appendix A]; the remainder were submitted by members of the public.

Chapters 3 and 4 of this report offer a detailed description of OPM Group's approach to response handling, analysis and reporting.

Consultation responses

This report summarises respondents' views by considering comments made in relation to each of the five consultation questions in turn. It also includes a chapter on comments relating to the Government's consultation on the Draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England.

This executive summary provides an overview of some of the key themes and issues that arise in this report, following the structure of the chapters in the report.

Chapter 5: Changes to Airspace

Call-in function for tier 1 changes

Most respondents express caveated support for the introduction of a call-in function for tier 1 changes, believing it will improve transparency and accountability to the community. These caveats usually relate to the criteria for call-in, particularly the need for a defined significant change in noise distribution before a call-in can take place. Respondents consider the definition of 'significant change' to be too high or too simplistic. In addition, the qualification that the airspace change needs to have an identified impact on health and quality of life is

seen as too subjective and therefore open to abuse. This concern about subjectivity applies to the other criteria: many respondents worry that without a tighter definition of 'strategic national importance' and 'significant impact on economic growth', the criteria become either meaningless or beneficial to industry only. In terms of the call-in process, some respondents seek greater community involvement, either directly or via local authorities, and a few ask that the scope of the call-in function is widened, for example to include smaller airports, lower level airspace changes or past planning applications.

Tier 2 changes

Many respondents support the proposals relating to the management of tier 2 airspace changes, though often noting concerns in relation to specific aspects of the proposals. In particular, many support the proposed requirements for community engagement, though many feel that these should be stronger. Many respondents express concern about the proposed trigger point for Air Navigation Service Providers (ANSPs) to engage with communities, arguing that this is too low or that it needs to be better defined.

Many of the other concerns with regards to the proposals for tier 2 changes relate to the Civil Aviation Authority (CAA) and its proposed role in these changes. Many respondents believe the proposals put too much faith in the CAA to be able to give sufficient consideration to community interests, often expressing concern about its independence.

Tier 3 changes

Again, many respondents are supportive of the proposals for managing tier 3 changes, while some feel they are not robust enough, particularly with respect to community engagement. Many express concern about the 'light-touch approach' it is proposed the CAA should take when setting tier 3 policy. Some say that in order to fulfil its proposed role in relation to both tier 2 and tier 3 changes, the CAA must have greater enforcement powers, or at least be given firmer guidance. While many are supportive of the proposed role for ICCAN in supporting the CAA, some feel that it should have a greater role with regards to enabling community involvement, or express concerns that this body would lack the powers and the independence to perform this role effectively.

Many are supportive of the requirements for community involvement in tier 3 airspace changes, in some cases highlighting a perceived lack of transparency in these changes currently. By contrast, some express concern about the resources needed for these requirements and worry they may impede or delay airspace changes as a result of being unnecessarily restrictive.

Proposals for compensation

The majority of those commenting on the compensation proposals are supportive, although again many add caveats to their support. These include the request for lower or more accurate noise level thresholds, increased compensation amounts and the consideration of a wider geographical area. Outright opposition arises from the belief that the Government should focus on noise reduction rather than noise mitigation, or that increased compensation levels could lead to industry prioritising sub-optimal airspace change options in order to reduce the

cost of compensation payments. Some consider the wording of the proposals to be too weak, putting too much trust in the aviation industry to treat communities fairly. The proposed provision of insulation as a compensation measure is questioned by some, with concerns that it does not mitigate noise impact experienced when outdoors, and that it is not effective or suitable for some buildings.

Chapter 6: Making Transparent Airspace Change Decisions

With respect to the proposals set out in Chapter 6 of the consultation document for making airspace change decisions more transparent, respondents are broadly in favour of the comparative appraisal of airspace change options through options analysis. They feel this will help increase transparency around how airspace decisions are made and enable communities to influence these. Others believe the proposals do not go far enough in this regard and put forward various suggestions for ensuring that communities are involved in airspace decisions. Many of those who comment on options analysis are specifically supportive of the need for consideration of multiple flight paths, emphasising the harmful impacts of the concentration of flight paths and criticising a perceived lack of notification and involvement of local communities in these changes. Related to this, they also highlight the other equality issues involved in the appraisal of flightpath options: the relative impact of aircraft noise on urban and rural areas, as well as on currently affected and unaffected communities. Respondents also put forward suggestions with regards to the methodology of the options analysis process, many of which relate to how this will enable community involvement in the process. These suggestions cover: the amount and type of data and information to be available to communities; the range and number of options to be considered; and the point at which communities should be involved.

Respondents also express concerns about the appraisal criteria, in terms of how different factors will be prioritised in the options analysis process. For example, some are sceptical about how noise impacts on local communities will be considered in relation to economic and commercial priorities. Others argue that other environmental impacts of aviation, particularly air pollution, also need to be taken into account.

Respondents are similarly supportive of the proposals to refine and improve the assessment of aircraft noise, including taking better account of the impacts of noise on health and quality of life. Support is expressed for the individual proposals set out in this chapter of the consultation document: replacing the single metric for the onset of significant community annoyance currently in use; the use of webTAG to assess impacts on health and quality of life; the introduction of supplementary metrics measuring the frequency of noise events; and the CAA's definition of overflight. Many question the basis on which the metrics - particularly the threshold values stated in the proposals – were decided, or ask for further information or clarification on the proposals relating to assessment overall, or specific aspects of them. Many also express concerns that the proposed metrics still do not accurately reflect the true impact of noise on communities. The main criticisms relate to averaged values not being representative of noise levels, and the need to better take account of ambient noise and respite periods.

Chapter 7: An Independent Commission on Civil Aviation Noise (ICCAN)

The need for an Independent Commission on Civil Aviation Noise as a way to build trust with communities is supported by most respondents. However, there are strong concerns that the current proposals will not allow it to meet this aim, particularly due to its perceived lack of enforcement powers or independence. Regarding its proposed functions, ICCAN's proposed role in commissioning research is particularly well-received by a wide range of respondents. However, comments relating to the other proposed functions reflect the disappointment about lack of enforcement ability mentioned above. Respondents say that the benefits of ICCAN carrying out advisory and monitoring functions, and promoting best practice, are severely limited without a regulatory role to ensure advice is followed and to impose sanctions for sub-standard noise management. Besides an increased regulatory role, respondents suggest several other additional functions for ICCAN, including an ombudsman or mediation function.

Many respondents believe that the Civil Aviation Authority's (CAA) previous record and the fact that it is funded by airlines means that it is inappropriate for ICCAN to be sited within this organisation. There is concern from a broad range of stakeholders that situating ICCAN within the CAA will prevent it being perceived as sufficiently independent from the CAA, and therefore jeopardise the aim "to build trust in communities". Most respondents therefore express preference for an ICCAN that is completely separate from the CAA, or suggest ways to mitigate potential CAA bias. In terms of governance, most respondents express support for ICCAN being publicly funded, and others stress the importance of a visibly independent head commissioner and a Board comprising a broad range of expertise. Most respondents who comment on the proposed five-year sunset review believe that ICCAN should be long-term or permanent and therefore object to this timescale.

Chapter 8: Ongoing noise management

The competent authority to assure application of the balanced approach

Respondents' views vary in relation to the proposals for ongoing noise management in Chapter 7 of the consultation document. Many are supportive of the proposals for the competent authority to apply the balanced approach to the adoption of operating restrictions at airports in England. However, others question the overall approach or express concern about one or more of the bodies proposed as the competent authority in different scenarios. Some are supportive of the localised approach to noise management proposed, which would involve devolving some areas of responsibility to local authorities and designated airports. Others express concerns about such an approach. Many of these argue that central Government should retain the areas of responsibility in question, or raise various concerns around the appropriateness of both local authorities and designated airports respectively taking these on. With regards to local authorities, they note that the issue of noise transcends local authority boundaries, and therefore view it as unfeasible and unfair for one authority to make decisions that will affect communities outside of their jurisdiction. They also believe there is a lack of resources and expertise in councils to perform this role, and question their ability to act

independently in these decisions, alleging conflicts of interest in some cases. Others question the suitability of the planning process as a means of addressing noise management issues, generally arguing that very few applications would meet the criteria set out in the consultation document.

Many respondents support the proposal that the Secretary of State should be the competent authority for operating restrictions brought forward with Nationally Significant Infrastructure Projects (NSIPs) or called-in planning applications. However, some question the ability or the appropriateness of the Secretary of State to decide on these matters. Respondents are also critical of the proposal that noise-related operating restrictions arising outside of the planning system will be decided by the CAA, with many questioning the independence of this body. Some believe that ICCAN has an important role to play in ongoing noise management both in terms of developing best practice and in providing independent oversight - generally and more specifically in relation to the CAA's decisions. Others, however, question the ability of the new body to perform such a role, expressing concern that, as proposed, it lacks the enforcement powers it would need to do so effectively. Respondents suggest various amendments or alternatives to the competent authority proposals, many of which fall within three key themes: maintaining central Government control of noise management; having a single competent authority (whether central Government, local authorities, or another body); and greater community influence.

Responsibility for noise controls at the designated airports

Many respondents oppose the proposal for airports to take responsibility for responsibility for noise controls (other than noise-related operating restrictions). Many of these respondents highlight a perceived conflict of interest arising from the fact that these are commercial entities. As such they do not believe that airports can be trusted to act in the interest of local communities in terms of managing and reducing noise. Some respondents express particular concern about night flights and Noise Preferential Routes (NPRs) being transferred to local authorities.

Many of those who oppose the proposal argue that the Government should retain the role of managing noise controls at the designated airports, or at least that there is a need for coordination at the national level. For example, respondents express concern about the potential for inconsistency in the approach taken at different airports, or argue that noise and air pollution limits should be enforced nationally. Some respondents suggest that ICCAN should play a role in monitoring noise management and ensuring local communities can effectively hold airports to account. Some also comment on existing arrangements in place at various airports for engaging local communities (particularly Airport Consultative Committees), often arguing that these need to be improved.

Publishing of aircraft tracks and performance data at designated airports

Respondents are supportive of the proposal that designated airports should publish details of aircraft tracks and performance. Many agree that this will help to increase transparency, build trust between airports and local communities, and allow communities to hold airports to account. However, a small number express concern that the publishing of data alone will not

reduce or address the problem of aviation noise adequately, arguing that these measures need to be accompanied by effective enforcement measures. Respondents also differ in opinion over the proposal that, beyond the minimum level of requirements, the content and format of the published data should be at the discretion of the airports. Some agree that airports, in consultation with local communities, should be able to make these decisions. They believe this will help to ensure that the resource requirements are minimised and that the data published is proportionate to the size of the airport and the impacts on local communities. Respondents put forward a number of suggestions around the type of data they believe needs to be published, where and how it should be made available (including the format of data and the frequency with which it is published), as well as how data will be collected and its quality and accuracy verified.

Incentives for industry best practice in noise management

Chapter 7 also considers measures to incentivise good practice by the aviation industry. Some respondents consider that industry is currently sufficiently incentivised, citing examples of good practice by airports and airlines in terms of controlling and reducing the impacts of noise and engaging local communities. Some feel that existing regulations and guidance are sufficient and express concern about the potential for excessive regulation to slow or impede airspace modernisation. Conversely, many respondents disagree that existing incentives are sufficient, often referring to examples of bad practice, alleging breaches of various regulations at specific airports. Many express the view that the priorities of the aviation industry - to maximise profits and reducing costs – are inherently incompatible with the aims of reducing impacts on local communities. Some argue specifically that the proposals set out in the consultation document will not improve the current situation, and that stricter enforcement and regulation is needed. Some also argue that other environmental impacts should be taken into account in the proposals as well as noise. Respondents suggest a number of incentive mechanisms they believe should be employed, including: fines and charges; sanctions; rewards and banning high-polluting aircraft (or encouraging quieter aircraft). Respondents also comment on the proposed role of ICCAN in driving up standards in noise management across the aviation sector. Again, they emphasise the potential of this body to provide independent oversight and build trust between the industry and communities, while expressing concern that it may lack the power and independence to do so as proposed.

Chapter 9: Draft Air Navigation Guidance

The draft Air Navigation Guidance was included in this consultation to illustrate how the proposals set out in the Consultation would be implemented in guidance to the CAA and the aviation industry. Some respondents support what they see as improved, clearer Guidance, although there are many requests for clarity in different sections of the document. There is a concern that the Guidance will be ineffectual due to the CAA's lack of enforcement ability and the increased responsibility given to the aviation industry for aviation noise management. Many comments relating to the Guidance raise issues which are covered in more detail elsewhere in the consultation and indeed many respondents simply ask that their responses to other consultation questions are taken into account when revising the draft Guidance. Other comments focus on a wide range of specific elements in the Guidance, such as the sections

covering replication of flightpaths with new procedures, National Parks and AONBs, and noise sensitive buildings.

Chapter 10: Additional comments on airspace policy

Some respondents make comments relating to the proposals as a whole. Many respondents draw attention to the various impacts of aviation on noise and air quality, citing their own experience of negative effects on health, quality of sleep and property values. Respondents are supportive of potential mitigation measures such as quieter aircraft, night flight restrictions and improved arrival and departure techniques (including the angle of take-off and landing and continuous climb and descent) although not everyone believes the benefits these measures can bring will be sufficient. There is an overarching concern that the proposals are not strict enough, or sufficiently different from previous policies, to bring about the improvements some respondents believe are necessary.

Some respondents are supportive of the case for airspace modernisation more generally. They argue that the current system is outdated and holding back the use of more joined-up, efficient practices. They add that modernisation will lead to a reduction of noise impact, for example through reduced need for stacking thanks to streamlining of airspace use. These claims are rejected by some respondents who predict that any efficiency gains arising from airspace modernisation will lead to increased frequency of flights rather than any reduction in noise impact for communities.

Chapter 11: Consultation process

Some respondents appreciate the opportunity to input through this consultation and request to be kept updated with future developments. However, others raise concerns about the consultation process and materials. In particular, the timing of the consultation is criticised, with some suspecting it has been rushed to link with the timeline for the proposed Heathrow expansion. Others do not think the consultation or its events were sufficiently well-advertised or accessible. Some describe the consultation materials as too long and technical although some of the diagrams were highlighted as being useful. In terms of the scope of the consultation, respondents point out a few perceived omissions including coverage of the General Aviation sector and the use of drones.

Glossary of terms

Acronym	Term	Meaning
	Airspace change	Changes to the design of UK airspace are proposed by an airspace change sponsor.
IA	Regulatory Impact Assessment	A systemic approach to critically assessing the positive and negative effects of a proposed government regulation.
AMSL	Above mean sea level	Altitude above the mean sea level (as opposed to above ground level).
AIP	Aeronautical Information Publication	A document which sets out the detailed structure of the UK's airspace and which is also intended to satisfy international requirements for the exchange of aeronautical information.
ANSP	Air Navigation Service Provider	A public or private entity providing air navigation services for general air traffic.
ATM	Air Traffic Movements	The landings or take offs of aircraft engaged in the transport of passengers or freight on commercial terms.
ACC	Airport Consultative Committee	Airport Consultative Committees (ACCs) provide a forum where airports can engage with key stakeholders in the local area and beyond.
AC	Airports Commission	Set up in 2012 by the Coalition Government as an independent body to identify and evaluate how any need for additional aviation capacity should be met in the short, medium and long term.
ACP	Airspace Change Process	The Civil Aviation Authority's airspace change process which is set out in its Civil Aviation Publication 725 (CAP 725).
	Airspace Change Sponsor	Those who develop proposals for amending the UK's airspace structure.
ABP	Altitude Based Priorities	Guidance issued by DfT to CAA to assist in the determination to what extent noise and other environmental factors are prioritised at different altitudes when it considers airspace changes.
	Ambient noise	Background noise or any sound other than the sound being monitored (primary noise).

	Angle of elevation	The angle of elevation of an object as seen by an observer is the angle between the horizontal and the line from the object to the observer's eye (the line of sight).
RNAV	Area Navigation	An accurate navigation system, similar to PBN. This a method of instrument flight rules (IFR) navigation that allows an aircraft to choose any course within a network of navigation beacons, rather than navigate directly to and from the beacons.
AONB	Area of Outstanding Natural Beauty	An area of countryside designated by a government agency as having natural features of exceptional beauty and therefore given a protected status.
ANASE	Attitudes to Noise from Aviation Sources in England	Previous DfT report on attitudes to noise published in 2007.
APF	Aviation Policy Framework	Government framework (2013) that sets out the sector's objectives and policies and its role in driving growth, creating jobs and facilitating trade, while addressing a range of environmental impacts.
	A-Weighted Scale	A sound measurement. The A-weighted scale incorporates a frequency weighting approximating the characteristics of human hearing.
	Balanced Approach	The Government's approach to managing aircraft noise is based on the principles of the International Civil Aviation Organization's (ICAO) Balanced Approach. The goal of the Balanced Approach is to address noise problems on an individual airport basis and to identify the noise-related measures that achieve maximum environmental benefit most cost-effectively using objective and measurable criteria.
	CAP 1498	CAA document containing a proposed new definition of overflight.
	Carbon emissions	Emissions of Carbon Dioxide from aircraft and airport infrastructure.
CAA	Civil Aviation Authority	The statutory body which oversees and regulates all aspects of civil aviation in the United Kingdom.
	Competent authority	The competent authority is the body responsible for approving noise related operating restrictions at an airport. Currently the 'competent authority' is the airport operator, except where the airport is designated under section 78 of the 1982 Civil Aviation Act. In such cases the competent authority is the Secretary of State.

CNF	Computer Navigation Fix	A Computer Navigation Fix (CNF) is also a point defined by a latitude/longitude coordinate and is required to support area navigation (RNAV) system operations. The GPS receiver uses CNFs in conjunction with waypoints to navigate from point to point.
	Concentration	This is where aircraft fly the same route consistently with minimal lateral dispersion.
CCO	Continuous Climb Operations	An aircraft operating technique enabled by airspace design, instrument procedure design and facilitated by Air Traffic Control (ATC). It allows departing aircraft to climb continuously, to the greatest extent possible. Aircraft applying CCO use optimum climb engine thrust and climb speeds until they reach their cruising levels.
CDO	Continuous Descent Operations	An aircraft operating technique enabled by airspace design, instrument procedure design and facilitated by Air Traffic Control (ATC). It allows arriving aircraft to descend continuously, to the greatest extent possible. With CDO, aircraft use minimum engine thrust, ideally in a low drag configuration, prior to the final approach fix.
dB/dBA	Decibel	Units describing sound level or changes of sound level. Expressed as dBA when it relates to the A-weighted scale.
DfT	Department for Transport	The UK government department dealing with all transport policy.
	Designated airports	Airports designated for noise control purposes under section 80 of the Civil Aviation Act 1982. Currently these are Heathrow, Gatwick and Stansted airports.
DCO	Development Consent Order	A consent by a Minister for a Nationally Significant Infrastructure Project (NSIP).
DALY	Disability Adjusted Life Year	One DALY can be thought of as one lost year of "healthy" life. The sum of these DALYs across the population, or the burden of disease, can be thought of as a measurement of the gap between current health status and an ideal health situation where the entire population lives to an advanced age, free of disease and disability.
	Dispersal/dispersion	Dispersal is the consequence of either natural variation from a flight path as a result of navigational limitations, or tactical vectoring of individual aircraft by ATC.
CAP 1520	Draft airspace design guidance	This is a draft of the CAA guidance document that supports the new process for assessing airspace changes.

	Envelope (Noise)	A concept that creates balance between aviation growth and noise reduction and incentivises the reduction of noise at source. A noise envelope should be agreed among stakeholders, take account of new technology and be appropriate for the airport in question. Noise envelopes can give local communities more certainty about the levels of noise they may expect in the future and could take the form of a movement cap, a maximum contour size, a quota count system or a limit on passenger numbers among others.
Leq / LAeq	Equivalent sound level	The measure used to describe the average level of sound experienced over a period of time (usually 16 hours for a day and 8 hours for a night) resulting in a single decibel value. Leq is expressed as LAeq when it refers to the A-weighted scale.
	Eurocontrol	The European Organisation for the Safety of Air Navigation. Membership is drawn from across Europe. It carries out a range of service provision and other operational and research activities linked to air traffic control.
EASA	European Aviation Safety Agency	EU body dealing with safety of civilian aviation.
	Flightpath 2050	European Union's research agenda for the aeronautics industry.
	Frequency of noise events	The number of instances of noise, over a specified volume (e.g. 60 dB), in a specified amount of time (e.g. 1 hour).
GA	General Aviation	General aviation (GA) is the term for all civil aviation operations other than scheduled air services and non-scheduled air transport operations for remuneration or hire.
	Hub airport	Serves as a transfer (or stop-over) point, where people can arrive from one airport and get to their final destination. Part of the hub-and-spoke system.
ICCAN	Independent Commission on Civil Aviation Noise	[One of the proposals in the Airspace consultation – yet to be set up] A proposed UK body responsible for providing independent and expert advice on civil aviation noise.
ILS	Instrument Landing System	The standard system for navigation of aircraft upon the final approach for landing.
IATA	International Air Transport Association	The trade association for the world's airlines.

ICAO	International Civil Aviation Organisation	The international aviation body established by the 1944 Chicago Convention on International Civil Aviation.
KPI	Key Performance Indicator	Project management term used to measure the effectiveness of a project aim or goal.
	Lmax	A measure of the loudest part of a sound event.
LAMP	London Airspace Management Programme	The NATS led project to modernise the airspace structure across southern England.
LAMP1	London Airspace Management Programme phase 1	Major airspace change proposal affecting airspace arrangements in south-east England, from Stansted to the Isle of Wight. Completed in February 2016.
LOAEL	Lowest Observed Adverse Effect Level	Above this level, an average person will begin to experience observable, or measurable, adverse effects on health and quality of life as a result of noise exposure.
Lnight	Night equivalent level	The equivalent sound level between 2300 and 0700 over the course of a year.
	Mitigation	Measures to reduce impact.
	Mixed mode	A mode of runway operation where runways are used for both take-off and landing at the same time. Can be used to increase capacity.
	N-above metric (e.g. N60)	Frequency of noise events over a specified decibel level.
NAPDM	National Air Passenger Demand Model	Measurement of the passenger demand for airport capacity.
NATS	National Air Traffic Service	The UK's en-route air navigation service provider which also provides services at many UK airports.
NSIP	Nationally Significant Infrastructure Projects	Large scale developments (relating to energy, transport, water, or waste) which require a type of consent known as development consent. For airport projects, the Planning Act 2008 sets the threshold as any development that adds 10m passenger movements or 10k cargo flights.
NPR	Noise Preferential Route	Noise Preferential Routes (NPRs) set the overall framework within which the flightpaths at a number of airports, including Heathrow, Gatwick and Stansted, were originally designed to mitigate noise impacts.

	Operating restrictions	Restrictions on operation at an airport, such as those that might be put in place to reduce noise. Noise related restrictions will be approved by the 'competent authority', which must operate in accordance with the 'balanced approach'.
PBN	Performance Based Navigation	A concept developed by ICAO that moves aviation away from the traditional use of aircraft navigating by ground based beacons to a system more reliant on airborne technologies, utilising area navigation and global navigation satellite systems.
PPR	Permanent and planned redistribution	This is where an Air Navigation Service Provider makes a conscious decision to amend an air traffic control procedure which results in the permanent shift of some air traffic.
PPG24	Planning Policy Guidance 24: Planning and Noise	A former government document guiding local authorities in England on the use of their planning powers to minimise the adverse impact of noise. Replaced by the National Policy Planning Framework in 2012.
	Point to point	The direct opposite of a hub, the idea that people are seeking and airlines are increasingly favouring providing direct services.
	Property blight	This is the reduction in marketability and value of land as a result of a public-sector decision.
RNP	Required Navigation Performance	This is a type of performance-based navigation (PBN) that allows an aircraft to fly a specific path with a degree of high accuracy.
	Respite	Time when an area is not overflown, which can be achieved either through runway alternation or route variation resulting from Options Analysis. The principle of noise respite is to provide planned and defined periods of perceptible noise relief to people living directly under a flight path.
	Section 106 agreements	Legal agreements between Local Authorities and developers under the 1990 Town and Country Planning Act for England and Wales; these are drafted when it is considered that a development will have significant impacts on the local area that can be moderated by means of conditions attached to a planning decision.
SOAEL	Significant Observed Adverse Effect Level	This is the level above which significant adverse effects on health and quality of life occur.
SES	Single European Sky	The Single European Sky (SES) is a European initiative to improve the way Europe's airspace is managed. Its purpose is to modernise

		Europe's airspace structure and air traffic management technologies so as to ensure forecast growth in air traffic can be met, safely and sustainably, whilst reducing costs and improving environmental performance, ensuring Europe's aviation industry remains globally competitive.
SEL	Sound Exposure Level	The steady noise level, which over a period of one second contains the same sound energy as the whole event. It is equivalent to the Leq of the noise event normalised to one second.
SAC	Special Area of Conservation	Special Areas of Conservation (SACs) are strictly protected sites designated under the Habitats Directive.
	Stacking	When aircraft deliberately delay their arrival by circling near an airport whilst waiting for an opportunity to land safely.
SIDs	Standard Instrument Departure routes	These are the established departure routes which are published in the AIP and which must be flown by aircraft when departing airports which have SIDs.
STARSS	Standard Terminal Arrival Routes	These are the established arrival routes for aircraft which are published in the AIP. They end at holding stacks.
	Statutory authority	A statutory authority is a body set up by law which is authorised to enact legislation on behalf of the relevant country or state.
	Sunset review	An evaluation of the need for the continued existence of a program or an agency.
SoNA	Survey of Noise Attitudes	In 2014 the Government commissioned a Survey of Noise Attitudes (SoNA) to investigate attitudes towards aviation noise and whether these have changed over the years. The results of this study have been published by the CAA.
Ofcom	The Office of Communications	The Government approved communications regulator in the UK.
Ofwat	The Water Services Regulation Authority	The economic regulator of the water sector in England and Wales.
	Transport Act 2000	This is an Act of the Parliament of the United Kingdom. It provided for a number of measures regarding transport in the UK, including the public, private, partnership of NATS.

	Vectoring	This is where an air traffic controller directs the pilot of an aircraft to fly a specific compass heading which can be off the normal airspace route structure.
	WebTAG	WebTAG is the Department for Transport’s guidance on appraising transport schemes. TAG Unit A3 includes an approach to analysing the possible health effects associated with aviation noise, based on WHO guidance and research reports from Defra and the Interdepartmental Group on Costs and Benefits (Noise).
WHO	World Health Organisation	The World Health Organization (WHO) is a specialised agency of the United Nations that is concerned with international public health.

Chapter 1: About the consultation

1.1. Background

- 1.1.1. Current airspace arrangements are outdated and infrastructure around airspace has remained largely unchanged for around 50 years.
- 1.1.2. In late 2012 the independent Airports Commission was set up to examine the scale and timing of any requirement for additional capacity to maintain the UK's position as Europe's most important aviation hub. In December 2013 they published their interim report followed by a final report in July 2015, within both reports there were recommendations relevant to airspace modernisation and noise management.
- 1.1.3. Since 2014, high profile changes and trials at Gatwick, Heathrow, Birmingham, and Edinburgh have caused a rise in public complaints. Policy changes are required to address these issues, to support airspace modernisation which will improve efficiency and provide additional capacity.
- 1.1.4. In February 2017 the Secretary of State (SofS), launched the "UK Airspace Policy: A framework for balanced decisions on the design and use of airspace consultation". The SofS confirmed the Government's commitment to airspace modernisation and its continuing support to aviation growth whilst supporting economic growth for the UK. The following supporting documents were also published on 2nd February 2017:
 - Revised draft air navigation guidance;
 - Survey of Noise Attitudes; and
 - Upgrading UK Airspace: Strategic Rationale.
- 1.1.5. Aviation and airspace are reserved matters therefore the proposals are applicable to the whole of the UK. The key proposals are:
 - the government to set the overarching framework for governing airspace decisions, with the CAA determining individual airspace arrangements. This framework will provide balance and transparency along with consistency;
 - the Airspace Change Process (ACP) will now include options analysis, a new tiered system, and it will also provide criteria for a call-in function for the SofS;
 - the establishment of an Independent Commission on Civil Aviation Noise to assure noise data and ensure noise is properly considered in change proposals, building on the recommendation from the Airports Commission;
 - non-strategic decisions on noise management will be delegated to airports and local authorities; and
 - clearer policy to ensure compensation is considered for airspace changes to bring it in line with policy on infrastructure changes.

1.1.6. In parallel to this consultation, the Government published its consultation on a draft Airports National Policy Statement which sets out the proposed framework against which a planning application for a Northwest Runway at Heathrow Airport can be brought. The Government brought forward the two consultations at the same time because of the relationship between them. The policy principles set out in this airspace consultation will influence decisions taken later in the planning process for a Northwest Runway at Heathrow, including how local communities can have their say on airspace matters and how impacts on them are taken into account.

1.2. The consultation process

- 1.2.1. The consultation on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace was launched by the Secretary of State for Transport on 2 February 2017. The consultation was open for 16 weeks, closing on 25 May 2017.
- 1.2.2. The purpose of this consultation was to seek views on an update to UK airspace policy to meet the needs of passengers, communities, the aviation sector and the wider economy.
- 1.2.3. It was a national, public consultation undertaken in accordance with the government consultation principles.
- 1.2.4. The consultation questions are listed in Table 1: List of consultation questionsTable 1.

Table 1: List of consultation questions

CHAPTER 4	Q1a: Please provide your views on 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 Air Navigation Guidance.
	Q1b: Please provide your views on the proposal that tier 2 airspace changes should be subject to a suitable change process overseen by the Civil Aviation Authority, including the Draft Air Navigation Guidance and any evidence on costs and benefits.
	Q1c: Please tell us your views on 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.
	Q1d: Please tell us your views on the airspace change compensation proposals.
CHAPTER 5	Q2a: Please provide your views on the proposal to require options analysis in airspace change processes, as appropriate, including details provided in the Draft Air Navigation Guidance.

	Q2b: Please provide your views on 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 Air Navigation Guidance.
CHAPTER 6	Q3a: Please provide your views on the Independent Commission on Civil Aviation Noise's (ICCAN's) proposed functions.
	Q3b: Please provide your views on 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.
CHAPTER 7	Q4a: Please provide your views on the proposal that the competent authority to assure application of the balanced approach to the adoption of operating restrictions at airports in England should be as set out in Chapter 7 on Ongoing Noise Management and further information at Annex F.
	Q4b: Please provide your views on 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.
	Q4c: Please provide your views on 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.
	Q4d: Please provide your views on 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.
DRAFT AIR NAVIGATION GUIDANCE	Q5: Please provide any comments on the draft Air Navigation Guidance published alongside this consultation.

1.2.5. For both consultations the Department held a series of local and regional events for members of the public and stakeholders¹.

1.2.6. In determining the location for the local consultation events, which were organised in particular for the communities with an interest in the draft Airports National Policy

¹ In accordance with the Planning Act 2008 for National Policy Statements. This requires the Secretary of State to consult and arrange for such publicity as he or she thinks fit.

Statement, the Department relied upon the Airports Commission's analysis of indicative flight path data and resultant noise contours associated with a new runway at Heathrow Airport. There are 17 local authorities that fall wholly or partly within what in 2030 would be a 54dB noise contour, assuming a new runway is constructed at Heathrow. DfT contacted these authorities for advice on the arrangements for publicising the consultation, and on the most appropriate venues for events. In some cases, the local planning authority areas did not align with the Parliamentary constituency boundaries so the events area was broadened to address this. As a result, DfT held 20 local events which were open to the public and 12 regional events for invited stakeholders in locations across the United Kingdom, including one in each of the Devolved Administrations.

1.3. The role of OPM Group

- 1.3.1. OPM Group² is an independent employee-owned research and consultancy organisation, delivering a range of services for public, private and third sector clients. Our Consultation and Engagement team specialises in consultation planning and analysis services, predominantly in the infrastructure sector.
- 1.3.2. OPM Group was commissioned by the Department for Transport to provide the following services:
 - advise on the consultation questions;
 - design and provide response channels (online form, downloadable PDF version of the response form, dedicated email address and Freepost address) to the consultation;
 - receive, process and analyse all responses submitted to the consultation; and
 - produce a summary report of the consultation feedback.

² <http://www.dialoguebydesign.co.uk/>

Chapter 2: Participation

2.1. Introduction

- 2.1.1. This chapter provides an overview of participation in the consultation. It covers response types and information about respondents.
- 2.1.2. In total, excluding null responses³, this consultation received 794 responses, of which:
- 623 came from individuals (including MPs and Councillors); and
 - 171 came from organisations.

2.2. Response channels

- 2.2.1. There were three official channels through which to submit a response to this consultation. All of these were advertised on the www.gov.uk website:
- online: using the dedicated consultation web form;
 - email: sending an email to the consultation email address; and
 - hard copy: sending a letter to the consultation Freepost address, or submitting responses at the consultation events held between 13 February and 20 April.

Respondents could use the consultation response form (available in hard copy or as a downloadable PDF) or send a response in their own choice of format.

- 2.2.2. The online response form and the email address (subject to the user's account settings) provided confirmation messages explaining that the response had been successfully received. Practical considerations prevented the use of confirmation messages for responses submitted in hard copy via the Freepost address.

Table 2: Number of responses by channel

Channel	Number of responses received
Online	204
Email	398
Hard copy	192
TOTAL	794

³ Null responses included general enquiries, duplicate responses, blank responses and responses which were obviously not intended as consultation responses, such as junk email

2.3. Response categories

2.3.1. Table 3 shows a breakdown of the types of responses received by the consultation.

Table 3: Response categories

Response Category	Number of responses received
Email/Letter	499
Response form: online	204
Response form: paper	58
Response form: email	33

2.3.2. OPM Group also received 65 submissions that were categorised as a null response. These included:

- general enquiries (these were forwarded to the Department for Transport);
- duplicate responses from the same respondent;
- blank responses; and
- responses which were obviously not intended as consultation responses, such as junk email.

These responses were not processed or analysed any further by OPM Group and are not included in the total number of responses.

2.4. Response sectors

2.4.1. For the purposes of reporting, respondents were classified by sector. A breakdown is given in Table 4 below. The sectors were identified and applied to respondents based on information provided in their response or in an iterative process between OPM Group and the Department for Transport. A list of organisations within these sectors is included in Appendix A.⁴

Table 4: Number of responses received by sector

Sector	Count
Individuals (including MPs and Councillors)	623
Statutory body	15
Local authority	65
Community group	35
Environment group	10
Airport	14
Airline	4
Air navigation service provider	1
Other transport provider (e.g. bus, train)	0
Small business	1
Medium business	0
Large business	1
Business umbrella body	9
Air freight business	3
Other	13

⁴ The list in Appendix A does not include individuals, small businesses or any organisations who have requested confidentiality.

2.5. Geographical breakdown of respondents

- 2.5.1. Figure 1 shows where responses were received from, based on postcodes provided by respondents. The map was produced using all the complete and legible UK postcodes provided (624 out of 794 responses). Responses without valid postcodes are not included in this map.

Figure 1: Geographical breakdown



2.6. Co-ordinated responses

- 2.6.1. OPM Group identified responses which appeared to have been co-ordinated. It seems that some groups sought to assist respondents by providing them with additional information on the consultation, publishing bullet points they could use to structure their own response or making it easier to respond by providing an addressed blank postcard. Information on those groups is provided below:

Heathrow Association for the Control of Aircraft Noise (HACAN)

- 2.6.2. HACAN is a campaign organisation that represents residents under the Heathrow flight paths. During the consultation, they published a briefing on their website that respondents could use to structure their own submissions.

Gatwick Area Conservation Campaign (GACC)

- 2.6.3. GACC is a community group that is seeking to improve the environment around Gatwick and to reduce noise and pollution. They published their response on their website so respondents could use it as a guideline when writing their own responses.

Englefield Green Action Group

- 2.6.4. Englefield Action Group sent out a leaflet with information on the consultation with a blank addressed card enclosed.

All co-ordinated responses were treated as individual responses.

Chapter 3: Methodology

3.1. Receipt of responses

3.1.1. Submissions were received in a number of formats:

- online response forms (via the online form);
- emails; and
- paper response forms, letters or postcards.

3.1.2. Before data processing, each response was assigned a unique reference number. Responses that had not been submitted online were processed by data entry staff so that they could be added to the database.

3.1.3. Where submissions contained images, maps and other non-text content, analysts could access a PDF version of the original submission, in order to see this information.

Responses received via the online form

3.1.4. Online submissions made via the online form were imported into the analysis database on a regular basis throughout the consultation period.

3.1.5. While the consultation remained open, online users were able to amend their submissions. If a respondent amended their submission, this was imported into the analysis database with a clear reference that it was a 'modified' submission. If the original submission had already been analysed, an analyst would review it and revise the coding as required.

Responses received via email

3.1.6. A consultation-specific email address, administered by DfT, operated for the duration of the consultation. Emails were forwarded – automatically and in turn – to OPM Group's dedicated email address. Throughout the consultation, the numbers of emails were compared to ensure that all were being successfully forwarded. At OPM Group, emails were logged and confirmed as real responses (i.e. not junk or misdirected email), given a unique reference number and then imported into the database.

Responses received via the Freepost address

3.1.7. A Freepost address (Freepost UK AIRSPACE POLICY CONSULTATION) operated for the duration of the consultation for respondents to submit hard copy consultation responses. Upon receipt, letters, postcards and paper-based response forms were given a unique reference number, scanned and imported into the database.

3.1.8. At the data entry stage, all scanned submissions, were transcribed using optical character recognition software, which can recognise printed text without the need for manual data entry. However, each of these files was then opened and reviewed by OPM Group transcription team in order to correct any misrecognition. Handwritten

responses were typed into the database by data entry staff within the transcription team.

Responses submitted to the Department for Transport

- 3.1.9. The Department for Transport took measures to ensure that responses mistakenly sent to their offices rather than to the advertised response channels were transferred to OPM Group.

Responses received at consultation events

- 3.1.10. Paper copies of the response form were available for visitors at the consultation events. All completed response forms were collected by a DfT member of staff and sent to OPM Group. A confirmation email, specifying the number of received responses, was sent by OPM Group upon receipt. These responses were treated as hard-copy responses.

Responses addressing the consultation on Draft Airports NPS which was run in parallel

- 3.1.11. The DfT decided to run both the airspace policy and draft airports NPS consultations at the same time to ensure that members of the public could take an informed view, having been provided with relevant information on the two different but related consultations. However, having two closely related consultations running in parallel led to some responses being sent to the wrong consultation, or addressing both consultations.
- 3.1.12. Responses sent to the wrong consultation: where it was clear that the response was intended for the Draft Airport NPS consultation, OPM Group processed it as part of that consultation.
- 3.1.13. Responses addressing both consultations: these were processed as part of the UK Airspace Policy consultation. The parts discussing the Draft Airports NPS consultation were analysed by the draft NPS analysis team via specially created codes and reported in an appendix of this report.

Quality assurance

- 3.1.14. The transcription process was quality controlled by a team of transcription supervisors, who reviewed a percentage of the transcriptions and indicated their quality using a comprehensive scoring system. The transcription quality score is a ranked scale, differentiating between minor errors (such as insignificant typographical errors), and significant errors (such as omitted information or errors that might cause a change in meaning).
- 3.1.15. The quality control process involved a random review of each team member's work. At least 5% of the submissions they transcribed were reviewed by response type. We set a process whereby if a significant error was detected, the quality control team reviewed 10% of the relevant team member's work on that response type. If a second significant error was detected, the proportion reviewed was raised to 100%.

Late submissions

- 3.1.16. The consultation period ended at 11:45pm on 25 May 2017 and the online form was switched off at this time.
- 3.1.17. To make allowance for postal delivery times and delays, responses that were received via the Freepost address with a postmark date of up to 1st June were accepted.
- 3.1.18. For consistency all email responses received up to midnight on 1st June were also accepted.
- Duplicate responses
- 3.1.19. OPM Group took steps to identify and remove duplicates, as far as reasonably possible. However, as some respondents may have used a different naming format or names may have been illegible, it is likely that not all duplicates have been removed.
- 3.1.20. Duplicate responses make no material difference to the summary report as they do not raise any additional issues.

3.2. Developing the coding framework

- 3.2.1. OPM Group created a coding framework to help analyse the issues raised in responses to the consultation. A team of senior analysts reviewed an early batch of responses and used these to develop an initial set of codes for the themes covered by each consultation question.
- 3.2.2. Each code represents a point of view expressed by respondents, and these are grouped together according to unifying themes or sentiments. This makes it possible to systematically record all of the points raised by respondents and report on this information in a logical, structured fashion.
- 3.2.3. Once an early version of the framework had been developed, OPM Group met with representatives of Department for Transport to receive their feedback. The purpose of this meeting was to ensure that the overall framework met their expectations in terms of the level of detail it covered and the separation of issues according to different themes. The analysis process was carried out independently of the Department by the OPM Group.
- 3.2.4. Coding frameworks necessarily expand and change over time, as more issues are raised by respondents and as we develop the approach to organising and presenting analysis.
- 3.2.5. OPM Group's codes usually consist of three tiers, using subthemes to group similar points together. For this consultation, some of the codes created consist of four levels, allowing for an extra level of detail in our analysis and reporting. We start with a high-level theme, typically related to a particular consultation question, then a sub-theme of that question, then either an ending which describes the point raised by respondents under that code, or an additional subtheme before this ending. Some higher-level codes (such as those capturing overall support and opposition) continue

to comprise only two tiers. Table 5 below provides an extract from the coding framework that illustrates this approach to creating codes.

Table 5: Extract from the coding framework

Tier 1	Tier 2	Tier 3	Tier 4	Final code
Question 4c: Publishing and transparency	Support proposals	–	–	Q4c - Support proposals
	Suggestions	How data should be collected	–	Q4c - Suggestions - How data should be collected
		How to publish	must be clear/accessible	Q4c - Suggestions - How to publish - must be clear/accessible
	Process	Concerns	cost/workload	Q4c - Process - Concerns - cost/workload
		How data influences decisions	allows comparison/analysis	Q4c - Process - How data influences decisions - allows comparison/analysis

3.3. Using the coding framework

- 3.3.1. Once the initial coding framework had been created and shared with the Department for Transport, senior members of OPM Group analysis team then instructed other analysts about how it should be applied to responses. Modifications to the framework, such as adding codes or splitting themes, could only be implemented by senior analysts, although all members of the team were encouraged to provide suggestions.
- 3.3.2. Senior analysts were responsible for checking the quality of the codes that other members of the team had applied to consultation responses. A minimum of 5% of each analyst's work was subjected to a quality assurance review, in which senior analysts used a comprehensive scoring system to rate the standard of each analyst's work. If an analyst's score dropped below a certain level, a higher proportion of their work would be reviewed, and they would receive further support to improve the standard of their coding. If it was found that an analyst had made a critical error in their work – indicating that they had misunderstood the meaning or sentiment of a respondent's point – then all of their work would be reviewed.
- 3.3.3. The quality assurance of coding serves two purposes: it gives assurance that the analysts are performing to the required standard, and it provides an insight as to how the coding framework could be refined and improved.

- 3.3.4. It is common for responses to contain identical or near-identical text, and we follow processes to ensure that our coding of these issues is consistent throughout. The analysis database aids this process by automatically applying the same coding to responses that are entirely identical.
- 3.3.5. It is common for responses to be submitted in formats that do not follow the question based format outlined in the consultation document. For example, responses submitted by email or letter would generally not include explanations of which consultation question particular comments were intended for. OPM Group's approach to analysing these responses was to apply codes from whichever of the theme-based sections of the coding framework were most relevant. For example, if a respondent submitted an email that discussed their views on the proposed functions of the Independent Commission on Civil Aviation Noise (ICCAN), we applied codes that have been created to analyse responses to question 3a, which asks for respondents' views on this area. This helped to ensure that comments on a particular topic were analysed consistently, regardless of the format in which they were submitted, and it helped us to organise and present our analysis.

3.4. Approach to reporting

- 3.4.1. OPM Group report writers used the coding framework as the basis for writing Chapters 5 to 11. As explained in 3.2.5, our codes usually conform to a three or four-tier structure, with the first tier corresponding to a consultation question and the second tier to a unifying theme within that question. OPM Group report writers assembled these sub-themes into an order to help them structure each question-based chapter.
- 3.4.2. The next stage was to add a further level of detail to the draft structure, by adding descriptive endings to individual codes after the second or third tier themes (using an additional fourth tier subtheme if necessary). Again, the purpose of this stage was to understand how best to present our analysis in a structure that was logical and clear and avoided undue repetition or overlap.
- 3.4.3. The result of this process was a full structure for each summary chapter, which our report writers could then use to organise their work.
- 3.4.4. We provide short summaries of each of the codes in the structure, explaining the issues that they represent and some context as to how they were raised by respondents. In some instances we provide further detail to illustrate the different ways in which respondents make the same or similar points, or to draw out the detail from relatively technical comments. In each case we use editorial judgement, and our in-depth knowledge of the coding framework, when deciding how much detail to provide for each of the points made by respondents. On occasions, several codes are covered by a single sentence in our report. This would usually be because the issues they represent are all closely related, and it would add little to the reader's comprehension of the general topic to list each of them.

Chapter 4: Reading the report

4.1. Introduction

- 4.1.1. This report summarises the responses to the Government’s consultation on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace. The report summarises the issues raised by respondents.

4.2. Use of numbers

- 4.2.1. Numbers are used very sparingly in this report, usually at the start of each analysis chapter so that the reader has a general sense of scale. It is important to note that this consultation was an open and qualitative process, rather than an exercise to establish dominant views across a representative cross-section of the public. Therefore, no conclusions can be reliably drawn about any population’s views beyond those who responded to the consultation. OPM Group’s intention is to accurately reflect the issues raised, rather than attributing any weight to the number of respondents raising them.
- 4.2.2. Throughout the report we have used quantifiers (for example, ‘a few’, ‘most’, ‘some’, ‘various’, ‘numerous’) when describing issues raised by respondents. These quantifiers do not correspond to a strictly defined volume of responses. Like the overall numbers we provide at the start of each chapter, the quantifiers are intended to provide a basic sense of scale and proportion, and to help make the report more approachable to readers.

4.3. Structure of the report

- 4.3.1. Chapters 5 to 11 of this report present a summary of our analysis, structured according to the main themes covered by each consultation question. Each chapter uses a similar approach: we summarise higher level comments expressing support and opposition for the proposals mentioned in each consultation question, then comments that deal with a more specific element of the proposal. For example, in Chapter 5 in the section dealing with the proposed call-in function for the Secretary of State in tier 1 airspace changes, we summarise what respondents said about the appropriateness of this proposed function in general, then look in closer detail about what people said about specific elements of the proposals, including detailed comments and suggestions relating to the criteria for the proposed call-in function and how it would work in practice. Each chapter begins with an explanation of the main themes that it addresses.
- 4.3.2. Our approach to reporting on responses that do not follow the question-based format of the consultation is similar to the analysis method described in 3.3.5. If, for example, respondents addressed ICCAN in non-fitting responses, we have presented our

analysis of those responses within the chapter on ICCAN. This enables us to present our analysis on a theme by theme basis, and to avoid repetition of identical or similar issues in different chapters. At the start of each chapter we explain the proportion of fitting and non-fitting responses that have been included in our analysis of that theme.

- 4.3.3. We have followed a similar approach when responses to a particular question include comments that are more directly relevant to another question. For example, question 1a relates to the proposed call-in function for the Secretary of State in tier 1 airspace changes and comments on this proposal are covered by codes within the question 1a theme. If a respondent comments on the proposed call-in function within their response to question 3a (relating to the proposed functions of ICCAN), we would apply codes from the question 1a theme. As a result, these comments would be included in the chapter summarising responses to question 1a.
- 4.3.4. We have included direct quotes from consultation responses throughout the report as a way of illustrating certain themes that were raised by respondents and the way in which they chose to raise them. The inclusion of a quote to illustrate a certain issue does not mean that we attribute greater importance to it. The names of respondents have not been included in the report, and we have not included quotes from any respondents who requested confidentiality.

Chapter 5: Changes to Airspace

5.1. Introduction

- 5.1.1. Question 1 asks for respondents' views on changes on the proposals relating to airspace changes. The question has four parts (1a to 1d), with each question covering a specific set of proposals in this area. These are: a call-in function for the Secretary of State (SofS) for tier 1 changes, management of tier 2 and tier 3 changes, and airspace change compensation.

Proposed call-in function for the Secretary of State in tier 1 airspace changes (Q.1a)

5.2. Question 1a: Overview

- 5.2.1. Question 1a asks:

Please provide your views on 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 Air Navigation Guidance.

- 5.2.2. Question 1a relates to tier 1 airspace changes – changes to the permanent structure of UK airspace. It is proposed that tier 1 changes are overseen by a new SofS call-in function. It is proposed that this function be triggered by a set of criteria.
- 5.2.3. Question 1a received 308 responses. While some of these respondents also commented on the proposed call-in function for the SofS in responses to other questions, no additional respondents discussed this topic outside of question 1a.

5.3. Overall support for and opposition to the proposed call-in function

Overall support

- 5.3.1. Of those respondents who explicitly express support for or opposition to the proposal for a call-in function, the majority are supportive of the proposal.
- 5.3.2. Most of these respondents state that the proposed function is necessary or adequate without commenting further. Of those who do elaborate on the reasons for their support, some comment that the call-in function would make the process of tier 1 airspace changes more transparent, accountable and democratic. This is seen as being particularly important in the context of acting as a balance against the observed lack of trust in the aviation industry and the CAA. A few of these respondents argue more specifically that the call-in function would be beneficial in protecting the interests of

communities, particularly in terms of ensuring against increased noise and air pollution.

- 5.3.3. Those who are supportive of the proposal also put forward a number of other more specific reasons for their support. Some feel that a mechanism for government intervention is necessary for issues of national importance, while others argue that government oversight more generally will ensure sustainable growth of the aviation sector. Finally, a small number of respondents believe that the call-in function will increase the speed and clarity of the airspace change process, benefiting both local communities and sponsors.

“The proposal helpfully goes some way to clarify the respective roles of the Secretary of State and the CAA, recognising the broader remit of the Government to balance UK-wide economic and societal interests”

Airport, User ID 131399

- 5.3.4. Many of those who are supportive of the proposed call-in function attach a caveat or condition to their support. These usually relate to the need for clarity, further accountability assurances or change to the criteria for call-in. (More detailed comments and suggestions relating to the criteria are in 5.4).

Overall opposition and concerns

- 5.3.5. A few respondents explicitly express opposition to the proposal for a call-in function. A few others, while not opposed to a call-in function in principle, state that the proposals are inadequate – for example that they do not go far enough or provide government oversight in the way they believe this is needed.
- 5.3.6. Many respondents note specific concerns in relation to the proposed call-in function. Most of the concerns again relate to the criteria proposed for the call-in (discussed in 5.4). Besides these concerns, the most frequently-mentioned issue relates to the extent to which the SofS will act independently. These respondents question who will hold the SofS to account, and whether the SofS will be susceptible to pressure both from the aviation industry and the minister’s party. Respondents note their opinion that this has happened in the past with previous Secretaries of State.
- 5.3.7. Respondents also question the appropriateness of the SofS performing this function on other grounds. A few are concerned about leaving the decision making with one person who they believe cannot consider all factors equally. They argue that the issues related to airspace change are too complicated for the SofS alone to decide on.

5.4. Comments and suggestions on the criteria for call-in

- 5.4.1. Paragraph 4.24 of the consultation document sets out three proposed criteria for the SofS to be able to call-in an airspace change proposal. These are:

- that the proposal is considered to be of strategic national importance;
- that the proposal could have a significant impact on UK economic growth; or
- that it could lead to a significant change in noise distribution, defined as a 10,000 net increase in the number of people subjected to a noise level of at least 54 dB LAeq 16hr (see Chapter 7 of the consultation document for explanation of noise values and assessment).

5.4.2. Many respondents believe that the proposed criteria are too restrictive, and that therefore the call-in function would be very limited. A few of these are particularly concerned that the criteria would exclude the possibility of a call-in at many small and medium-sized airports. Some respondents, most of whom are part of a co-ordinated response, point to previous changes in flight paths at Gatwick which have triggered protests and the involvement of local Members of Parliament, and note that these changes would not have fallen within the proposed criteria.

“We are concerned that excessively restrictive criteria are being proposed to allow the Secretary of State to avoid participation in decisions that are every bit as important as those the Government involves itself with in other contexts. We want to see an active, interventionist, Secretary of State who uses the powers given to him by Parliament, not one who seeks to avoid responsibility”

Local authority, User ID 131331

- 5.4.3. A few respondents - mostly individuals and a few local authorities, community and environmental groups - raise a number of concerns around the fact that the only environmental trigger proposed in the criteria is noise pollution. Some of these respondents raise concerns that air quality is not a trigger. A few, mainly environmental groups, suggest that designated assets such as AONBs should be taken into account, while others feel there should be a greater emphasis on health impacts.
- 5.4.4. Many respondents request clarification of the call-in criteria, expressing the view that insufficient detail is provided in the consultation document on how they would be applied in practice.

Criterion 1: Strategic national importance

- 5.4.5. A few respondents express support for the ‘strategic national importance’ criterion. However, the majority of those who comment on this criterion - especially local authorities and community groups - are more critical, noting various concerns. Some express concern that the criterion could be used to override concerns of local communities. Others refer to the subjective nature of this criterion and the need for it to be better defined. Some are concerned that the definition would be dictated by business interests rather than the interests of society and the environment. A few respondents request that the definition takes environmental protection into

consideration, for example effects on climate change and on Areas of Outstanding Natural Beauty (AONBs).

Criterion 2: significant impact on economic growth

- 5.4.6. A few organisations, including local authorities and an airport, express support for the second criteria without commenting further.
- 5.4.7. However, some respondents - generally local authorities, environment groups and community groups - criticise this criterion on the basis that it is too vague and hard to define or quantify. A few of these respondents argue that, worded in this way, it would allow wide scope for the SofS to intervene.

“Indeed as written, the call-in of any ACP could be justified on the above basis, and we find it impossible to view the prospect of this particular call-in as likely to be motivated by the community-protection side of the balancing process.”

Community group, User ID 131269

- 5.4.8. By contrast, one community group suggests that the vagueness of this criterion restricts the scope of the criterion, as the claim of ‘significant’ impact is easily argued against.

Criterion 3: Change in noise distribution

- 5.4.9. The majority of the comments on the proposed criteria for the call-in function relate to the third criterion. As well as commenting on the overall suitability of this criterion, respondents raise issues in relation to three requirements within it:
- the 54 dB LAeq 16hr threshold;
 - a 10,000 net increase in the number of people affected by aviation noise at this level; and
 - an identified adverse impact on health and quality of life.

The 54 dB LAeq 16hr threshold

- 5.4.10. With regards to the threshold stated as part of this criterion, a few respondents acknowledge that numbers of movements that can be heard, as well as the long-term average noise level, are important. However, many respondents challenge the specific value set for the threshold. Some comment that 54 dB LAeq 16hr is too high and suggest a lower noise threshold. A few respondents believe that setting the threshold at this level would limit the call-in procedure to areas close to major airports.
- 5.4.11. Many also question the proposal to set a single threshold value for the noise level, arguing that this makes this criterion too inflexible. Some of these respondents note that a single metric would not be able to take account of specific circumstances such as the presence of schools and designated environmental sites. Others express

concern that using a fixed threshold does not allow for future changes in sensitivity to aircraft noise.

- 5.4.12. A few respondents - mostly local authorities - question the basis on which the level of 54 dB was decided. A few of these note that this does not correspond with the 51 dB threshold proposed for the Lowest Observed Adverse Effect Level (LOAEL) set out in Chapter 5 of the consultation document (see Chapter 6 of this report). Others query the use of a single metric, noting that an equivalent night time value for the LOAEL is stated in Chapter 5 of the consultation document, as well as upper and lower values.
- 5.4.13. As with comments on the metrics proposed in Chapter 5 of the consultation document, a few respondents argue that the 54 dB LAeq 16hr threshold does not take account of peak noise levels or ambient noise levels (again, see Chapter 6 of this report for further discussion of these issues). Some of these respondents propose alternative approaches and metrics to be used alongside or in place of this threshold to take account of geographical variances in the relative impacts of aviation noise. These include a night metric, the percentage increase in overflights, lower thresholds for AONBs and 'heat maps' showing aviation noise impact by area before and after a proposed airspace change.

“Basing the criteria on the 54 leq contour would be unsatisfactory because this metric does not take ambient noise levels into account. It also fails to take account of the increased level of annoyance caused when a new flight path is over areas which have not been previously overflown”

Local authority, User ID 131331

10,000 net increase in the number of people affected

- 5.4.14. A few respondents welcome the fact that the Government recognises that those newly overflown are likely to be particularly sensitive to repeated aircraft events. Some, however, raise various concerns and criticisms of the threshold proposed for the net increase in the number of people affected by noise.
- 5.4.15. Many respondents argue that the threshold of 10,000 people is too high, making the criterion overly restrictive so that changes that would potentially affect a considerable number of people would still not qualify. A few respondents argue that setting the threshold at 10,000 people does not take account of the impact on smaller, more rural communities newly affected by aviation noise. Suggestions include using 5,000 people as a threshold, or a percentage of the total local population, to assess on an individual basis, or to have a smaller increase in people experiencing a greater noise pollution. One respondent asks for comparison noise distribution figures for recent changes. Some respondents query the basis on which the threshold was decided.

“The criteria of excluding 9,999 people affected is too narrow. This is particularly the case if the effect is very significant eg from busy concentrated flightpaths”

Individual, User ID 5004

- 5.4.16. One airport also notes that the threshold appears particularly high considering the Secretary of State's role in determining planning applications for other noise-producing infrastructure, such as road or rail improvement schemes, whose effects may be very local in comparison. By contrast, some note that the threshold may not be appropriate for larger airports such as Heathrow and Gatwick where – as a result of the number of flights from these airports - any and all changes could qualify.

“The proposed trigger of a 10,000-net increase in population impacted by aircraft noise exceeding 54 dB(A) and having an identified adverse impact on quality of life and health is too narrow and not proportionate. Such a narrow criteria may have little impact on airspace changes outside of Heathrow, Gatwick and Manchester airports. Conversely the trigger would probably lead to all airspace changes at Heathrow becoming subject to a call-in review”

Business umbrella body, User ID 127456

- 5.4.17. Aside from the number used for the threshold, many respondents criticise the focus on measuring the net additional increase, arguing that instead it is the absolute number of people affected that is important. They note that focusing on 'net increase' excludes major changes in airspace which result in the re-routing of flightpaths affecting previously unaffected residents where the net increase may be zero but thousands of new residents are being overflown. Similarly, one respondent notes that if an airport expands gradually in stages then the call-in criteria may not be triggered. A few respondents express concern about the possibility that the threshold would encourage sponsors to break down airspace changes into smaller components to avoid a call-in.
- 5.4.18. Other respondents criticise the fact that the call-in only relates to increases in numbers of people exposed to noise and not to significant increases in exposure for large numbers of people already suffering a significant adverse effect. They argue that the call-in threshold should be based on relative change in impact as opposed to absolute change.

An identified adverse impact on health and quality of life

- 5.4.19. Many respondents question the qualification at the end of this criterion: ‘as well as having an identified adverse impact on health and quality of life’. They criticise this requirement on the basis that they perceive it to be too subjective.
- 5.4.20. Some of these respondents express concern that the subjective nature of this part of the criterion would make it easy for sponsors to deny. In this way, they feel it would

provide a legal loophole, while at the same time failing to fulfil the intended aim of avoiding increased impacts on health and quality of life.

5.4.21. A few respondents question how a specific health impact could be identified and linked to a specific route. Others note that it will take time for long-term symptoms to develop, and that in fact the burden of proof should not be necessary as sufficient evidence exists already on the relation noise and certain health conditions.

5.4.22. A few respondents suggest that in place of the requirement for demonstrable impacts on both health and quality of life, evidence of significant impacts on either area should be sufficient. They suggest therefore that this part of the criterion should be changed to ‘impacts on health *or* quality of life’.

Other comments and suggestions on the criteria

5.4.23. Respondents put forward a number of suggestions with regards to the criteria for the call-in function, most of which relate to the perception that the criteria are too restrictive. A few respondents feel that, in order to maintain democratic involvement in airspace changes, any proposal that would be likely to have a significant impact should be capable of being called in.

5.4.24. Others suggest that greater consideration should be given to the views of local communities, as well as - or instead of – overarching criteria. A few respondents suggest that different criteria should be used for different sized airports.

5.4.25. Finally, one respondent suggests linking the call-in criteria to the outputs of an impact assessment using the webTAG method (see Chapter 6 of this report for an explanation of webTAG). Another suggests that there be an assessment before a call-in, to avoid missed or unnecessary call-ins.

5.5. Other comments and suggestions on the call-in process

5.5.1. Respondents put forward various suggestions and comments relating to the call-in process. These cover:

- the roles and responsibilities of different actors and agencies;
- the scope for the application of the call-in function;
- the timescale for the proposed call-in process; and
- specific issues or suggestions for consideration.

The role of various actors in tier 1 airspace changes

Local communities

5.5.2. Many of the comments on the call-in proposal relate to public involvement and the role of communities in the call-in process and tier 1 airspace changes more generally. Many respondents, including local authorities, individuals and a community group, suggest that a public consultation should take place alongside the call-in process - or

at least that there is wide engagement with local communities - and that their concerns are balanced against economic interests. One respondent asks that PBN, concentrated flight paths and departure gradients also be subject to consultation.

- 5.5.3. While a few respondents express concern that the call-in function may become an appeals process, many would like an appeal mechanism for local communities to be included.

Airport Consultative Committees

- 5.5.4. A few respondents comment on the role of Airport Consultative Committees (ACCs). These respondents are all supportive of engaging with and consulting ACCs.

Local authorities

- 5.5.5. A few respondents would like to see local authorities, as the democratic body closest to potentially affected communities, have a greater role in decision making. Conversely, others believe that local authorities would not have the necessary expertise. To assist with this, one local authority asks that meaningful guidance be introduced in place of the planning guidance in PPG 24. A few respondents, including local authorities and a community group, believe that local authorities should be kept informed and engaged by airports with regards to proposed changes which may affect their communities.

The Government/SofS

- 5.5.6. With regards to the role of the SofS or the Government more generally, a small number of respondents question the need for government oversight of tier 1 changes. In contrast to those who are critical of the CAA's current performance, these respondents believe that the majority of tier 1 airspace changes are overseen sufficiently well by the CAA, and that government intervention is usually not needed. By contrast, a few respondents argue that the level of government oversight proposed is inadequate.
- 5.5.7. A few respondents suggest that the SofS share powers – either with other government departments (for example the Department for Environment, Food and Rural Affairs), or with Parliament having the final decision. One local authority suggests that the DfT official which will support the SofS should be an integral part of the Public Evidence Session (PES) proceedings proposed as part of the call-in process, or that the SofS appoint their own independent chair of a PES for a called in proposal.

The CAA

- 5.5.8. Some respondents make suggestions regarding the CAA's role in tier 1 changes. These mostly come from a co-ordinated group of respondents, and relate to the Government being clearer about the balance it expects the CAA to achieve in its decisions. Some of these respondents would also like the CAA be given an explicit environmental objective. Some requested that the criteria applied by the CAA be transparent: the CAA itself to make clear the way in which it will make decisions,

particularly the balance it strikes between competing objectives. One respondent suggests that the CAA should have the power to firstly consider and subsequently apply the need for a potential SofS call-in at an early stage of the process.

“In addition we urge the government to set out more clearly the balance it expects the CAA to achieve in the decisions it takes. Specifically we would like to see the CAA be given an explicit environmental objective”

Community group, User ID 129548

- 5.5.9. One statutory authority also asks that the DfT work with the CAA to ensure that call-in requests, decisions to call-in and final decisions taken by the Secretary of State are communicated via the CAA’s online portal, to enhance transparency and keep the process accessible and comprehensible for stakeholders and the public.
- 5.5.10. As mentioned already, many respondents are critical of the CAA’s role in tier 1 airspace changes. Some respondents are concerned that any flight path changes that are not called in would instead be subject to CAA decision making.

ICCAN

- 5.5.11. Other respondents ask that an independent body such as ICCAN is able to take final decisions on flight paths. This is particularly important for respondents who are wary of the CAA making decisions when not called in.

The scope for the application of the call-in function

- 5.5.12. Many respondents – including statutory bodies, local authorities, community groups and individuals - suggest that the call-in process should be extended to cover tier 2 airspace changes, as they can have the same impact on local communities as tier 1 changes. One local authority suggests that the process also covers tier 3 changes.
- 5.5.13. A few respondents believe that the call-in function should apply to smaller airports as well as larger airports. These respondents use London City Airport as an example, citing its plans to expand.
- 5.5.14. A few respondents, including local authorities, community and environment groups, state disagreement with the provision that the call-in function may not be used to reopen a local authority planning decision. A few of these respondents express concern that in some cases such decisions may be made on the basis of incomplete information - such as indicative flight paths – which could then change significantly. One local authority requests clarification as to whether this restriction applies to Development Consent Order (DCO) applications, as in case of expansion at Heathrow.
- The timescale for call-in by the SofS
- 5.5.15. A few respondents note that people may not experience the full impacts of a flight path change until after the event, and therefore request that the function apply retrospectively within a certain period, for example 5 years.

- 5.5.16. Regarding the 28-day period allowed to invoke a call-in, a few respondents - individuals and local authorities - argue that this is not long enough and that the period should be longer to allow residents to hear about a proposal and work through its implications. One of these respondents suggests the timescale should be three months.
- 5.5.17. Some respondents suggest that the call-in process takes place at an early stage in the life-cycle of an airspace change development to avoid delays. A few organisations – including airlines, an airport and a business umbrella body - suggest that the call-in process itself is time limited to provide certainty and to minimise the impact on airspace sponsors. Another respondent suggests that any call-in decision is made within and not outside of the CAA's proposed decision-making timescales.
- 5.5.18. More generally, a few respondents express concern that the call-in process would be time-consuming and costly. One airport emphasises that airspace modernisation must not be slowed.

“The timescales for completing a call-in review should be specified clearly at the outset and capped to provide airspace change sponsors with planning certainty”

Airline, User ID 131379

Other specific suggestions in relation to the process

- 5.5.19. Respondents put forward a number of specific suggestions, or highlight considerations they feel should be taken into account in relation to the call-in process. These include:
- that a Regulatory Impact Assessment is carried out and is made public;
 - that the SofS be obliged to call in a proposal if a request is made by an MP on behalf of people in a constituency affected;
 - that the DfT should consider in advance any additional policy principles it may wish to rely on during any potential call-in decision to avoid creating new process risks;
 - that call-in function be used on a more systematic (as opposed to an ad hoc) basis. For example, it could be focused on more detailed noise pollution events and causes, thereby putting the burden of responsibility on noise creators;
 - that the planning and airspace change processes run simultaneously in order to avoid unnecessary delays;
 - that a process be established to handle a call-in related to the SofS's home constituency;
 - that where an aerodrome would close if an airspace change cannot be introduced to meet the requirements of legislation, the SofS should have the final decision; and

- that the call-in process should be co-ordinated and compatible with the National Aviation Policy Framework objectives (particularly those relating to noise), as well as the Draft Airports National Policy Statement and the CAA's new Airspace Change Process.

Requests for further detail or clarification

5.5.20. Respondents also request further information or detail on specific aspects of the proposals. Many feel that further information is needed on the call-in process as a whole - for example suggesting the process to be illustrated using worked through end-to-end examples. Others highlight particular aspects of the proposal for which they feel further information and clarification is needed. These include:

- the roles and responsibilities of the key stakeholder groups that may recommend or participate in a call-in review;
- whether individuals, community groups or local authorities can request a call-in;
- the steps that will be taken to ensure that the process is 'proportionate, transparent and defined';
- the specific objectives, administration, assessment approach and outputs of a call-in review, as well as the timescales for this process;
- how the public and other bodies would be informed of both the proposed changes and the call-in function;
- whether the call-in function will give the SofS a veto on airspace change proposals;
- whether the proposed CAP1520 Public Evidence Session will have been held in advance of and to inform a SofS decision;
- the relevant legislation and guidance; and
- the relationship between UK airspace policy and European legislation in the context of Brexit.

Tier 2 Airspace Changes (Q.1b)

5.6. Question 1b: Overview

5.6.1. Question 1b asks:

Please provide your views on the proposal that tier 2 airspace changes should be subject to a suitable change process overseen by the Civil Aviation Authority, including the Draft Air Navigation Guidance and any evidence on costs and benefits.

5.6.2. Question 1b relates to Tier 2 airspace changes: planned and permanent changes to ATC's day-to-day operational procedures (e.g. vectoring practices). It is proposed that, subject to certain criteria, ANSPs and the CAA should assess tier 2 proposals and establish a policy on an appropriate change process which should include community engagement.

5.6.3. Question 1b received 311 responses. While some of these respondents also commented on tier 2 changes in responses to other questions, no additional respondents discussed this topic outside of question 1b.

5.7. Overall support and opposition

Support

5.7.1. Of those who responded to this question and indicated a view, the majority express overall support for the proposal. Those who are supportive mostly welcome the opportunity for community engagement, or express the belief that the increased transparency and accountability will help to protect communities. Many note the lack of community engagement at present, and the frustration felt at having to live with current noise levels. Some emphasise that the current situation also leaves the UK slow to make decisions, putting it at a competitive disadvantage.

5.7.2. However, many respondents attach a caveat to their response, with a number of these being related to the trigger for engagement and for the proposed exclusions.

Opposition

5.7.3. A few respondents express outright opposition to the proposal. Some of these simply state that the proposal is inadequate or will not address the negative impacts of airspace changes. Others believe that the process would be 'unwieldy' and impractical, as it would be impossible to consult every time frequent vectoring changes take place. A few respondents feel there is insufficient consideration for community engagement in the proposals.

“Again, ensuring the effect of any airspace changes on changes in noise levels in local communities is key. I am not clear that the proposals go far enough to ensure this.”

Individual, User ID 106587

5.8. Comments on individual elements of tier 2 changes

5.8.1. Many respondents comment on the individual elements of the proposal. These are that:

- when changes are likely to cause a permanent and planned redistribution (PPR) and create a certain level of noise impact below 7000 feet amsl, ANSPs should engage with affected communities;
- the CAA should assess the proposal and give its approval for the procedural change before it is implemented; and
- the CAA should establish a policy on an appropriate change process for tier 2 airspace changes in line with their duties under the Transport Act 2000, and to be consistent with better regulation principles and practices. This will include the level of engagement which is considered suitable, including where consultation is appropriate.

First element of the proposal

5.8.2. Many respondents comment on the first element of this proposal. Some ask for clarification of what *‘a certain level of noise impact’* means, and request that wider measurement criteria are used, including LOAEL, Leq 16hr, Leq 4hour, N 60/65 and Lmax. They also emphasise that the altitude threshold itself should be higher; 8,000ft and 10,000ft are both suggested.

5.8.3. A few respondents also suggest that an above ground level (AGL) value should be used instead of above mean sea level (AMSL).

5.8.4. One respondent suggests that the DfT undertake further research to understand at what height planes generally get above the LOAEL of 51dB.

5.8.5. A few respondents ask that that a health impact assessment is part of the criteria. The number of people affected and time of day are also suggested as criteria.

Second and third elements of the proposal

5.8.6. Respondents generally use the second and third elements of the proposal to comment on the CAA in general. Although a minority, those expressing outright support view the CAA as a pragmatic and qualified regulator. The majority of those commenting on the role of the CAA in tier 2 changes however, are critical. These are mainly community groups and local authorities. These respondents are mistrustful of the CAA’s ability to ensure community and environmental needs are taken into account, believing that it is biased towards the aviation industry. They cite previous

changes approved by the CAA, such as the PBN changes at Gatwick in 2014 as evidence for their views. One respondent comments that the Draft Airspace Design Guidance is difficult to understand, which suggests that the CAA do not know how to engage with the public. A couple of respondents are concerned that the CAA does not have sufficient resources to enable it to carry out the proposed role.

5.8.7. Many respondents put forward suggestions in relation to the role of the CAA. As discussed in Chapter 7 of this report, they mostly feel that it should be replaced or supplemented with a more ‘independent’ authority. Some respondents believe that ICCAN would better fulfil the role proposed for the CAA, whereas others feel that a completely independent body is needed. A few local authorities and community groups advocate an appeals procedure for local communities. Other respondents ask that the CAA ensures its measurements are transparent. A few respondents suggest that the CAA is given detailed information at the start of the process to inform its decision-making. Other suggestions include:

- that the CAA should also assess whether changes will lead to increased air traffic from a variety of airports;
- that the CAA consult with manufacturers and industry trade associations on any vectoring proposals; and
- that the DfT and CAA policy and regulatory requirements be seamlessly aligned and logically sequenced;

5.9. Other comments and suggestions relating to tier 2 changes

5.9.1. A large number of respondents make comments and suggestions for the process of tier 2 changes as a whole.

Concerns

5.9.2. Some respondents feel there should be more consideration for enforcement and compliance in the management of tier 2 changes. Respondents would also like unauthorised breaches by airports and airlines to be penalised, and for there to be opportunities for public reporting.

5.9.3. Some respondents are sceptical of the proposal for public engagement. They argue, for example that local authorities cannot always speak for the public, and that guarantees are needed that the CAA will listen to the public and act accordingly, rather than just consulting.

“This question is written as a fait accompli. Of course the local community should be engaged, however it seems to make little difference to outcome”

Individual, User ID 4470

- 5.9.4. A few respondents, mainly airports and airlines, express concern that the proposals could risk the change process being delayed unnecessarily, particularly if the change is unlikely to have any discernible impact on communities anyway. Related to this, some suggest that a timeframe for change processes should be established, so as to manage stakeholder expectations.
- 5.9.5. A few respondents note that the criteria for assessing whether a change in vectoring procedure qualifies as a PPR should be proportionate so as not to act as a disincentive to more efficient airspace use.
- 5.9.6. Some respondents are critical of the proposed exclusions, particularly:
- the proposal to exclude ‘any procedural change linked solely to the maintenance of a high standard of air safety’; and
 - the proposal to exclude airports handling fewer than 50,000 movements per year.

Regarding the first point, respondents argue that it is too broad, as it could exclude changes where safety becomes a concern only because of an increase in traffic numbers, for example. In relation to the second point, respondents argue that the noise from these smaller airports can still be considerable, particularly in rural areas.

Suggestions

- 5.9.7. Many of these comments suggest that the process for tier 2 airspace changes should include a greater degree of local involvement than currently proposed, for example through public consultation. Respondents ask that:
- communities are consulted both before and after the changes;
 - it begins early in the process; and
 - that the CAA must respond to community feedback.

One respondent notes that the CAA may be tasked with establishing a proportionate methodology for consultation and suggests that this methodology could be quality-checked by the affected local authority.

- 5.9.8. Some comments relate to ANSPs. A couple of respondents suggest that ANSPs and the CAA should receive more guidance in assessing when PPR is likely to create adverse impacts that will require consultation. It is also suggested that the flexibility for ANSPs to adapt procedures based on safety requirements or short-term, temporary changes in airspace use is retained. Some comments ask that the applicability of the process be widened to cover stakeholders and airports, rather than just ANSPs.
- 5.9.9. Some respondents would prefer all tier 2 changes to trigger compensation process.
- 5.9.10. Some respondents ask that there be more environmental assessment. These comments suggest that environmental costs be given a greater weight than they currently are. A couple of community groups ask that where nationally protected

landscapes are to be impacted, the decision making process should include liaison with the public sector bodies responsible for Areas of Outstanding Natural Beauty (AONBs). A few airports ask that a Regulatory Impact Assessment is also undertaken and made visible.

“To that end, insufficient guidance is provided on how the local environmental costs will be balanced against wider economic benefits”

Airport, User ID 124830

- 5.9.11. Some comments relate to aviation industry. A few respondents suggest that a draft process should be developed in collaboration with it and issued for consultation before the policy on tier 2 airspace changes is agreed. Another suggestion is that industry has a formal mechanism to propose operational improvements as part of industry wide commitments to achieving EU ACARE (Advisory Council for Aviation Research and Innovation in Europe) Flightpath 2050 noise reduction targets.
- 5.9.12. Other comments include:
- a request for more consistency between tier 1 and 2 change processes;
 - that there are mechanisms to ensure the process is scalable;
 - that any forthcoming legislation or future guidance should only impact future PPR practices and should not have an effect on any current practices;
 - that the process be benchmarked, so that once a stage has been passed and approved, it will not be revisited (which would require extra resource);
 - that service standards are established and agreed; and
 - that airport consultative committees be invited to assist in undertaking a first sieve to identify what airspace changes their airports need.

Requests for further information

- 5.9.13. Many respondents request clarification on the process for tier 2 changes. A large number of these feel that further details are needed of the requirements for community involvement in this process, a few suggesting a distinction between where engagement and formal consultation is proposed. Other requests for clarifications include:
- that timescales are outlined more clearly;
 - that the difference between tier 1 and tier 2 change processes is clarified more clearly;
 - clarification of the word ‘proportionate’ which is used to describe the suggested approach taken to implement tier 2 changes;
 - clarification that changes do not only relate to an ANS; and

- clarification that the scope of ANSP operational changes that the CAA will be directed to approve before they can be implemented by ANSPs.

- 5.9.14. Some respondents request further information regarding how the process would apply to airports that have published routes with no Standard Instrument Departure routes (SIDs), Standard Terminal Arrival Routes (STARs) or Noise Preferential Routes (NPRs).
- 5.9.15. A few respondents comment on vectoring in general, with one claiming that vectoring practices can cause as much noise impact as changes to formal airspace structure. Respondents cite previous changes such as the re-design of the Gatwick departure Route 4 as having impacted significantly on communities. A couple of respondents would like more information on existing vectoring arrangements, for example software used.

Tier 3 Airspace Changes (Q.1c)

5.10. Question 1c: Overview

5.10.1. Question 1c asks:

Please tell us your views on 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.

5.10.2. Tier 3 airspace changes are changes to operations, for example significant shifts in the distribution of flights on routes. These may not be planned changes, but shifts over time and in response to changes in demand. It is proposed that the CAA should put in place a suitable policy for industry to follow in respect of tier 3 airspace changes. This should include expectations on transparency and engagement with local communities. It is proposed that the CAA takes a 'light-touch' approach, working in conjunction with ICCAN.

5.10.3. Question 1c received 300 responses. While some of these respondents also commented on tier 3 airspace changes in responses to other questions, no additional respondents discussed this topic outside of question 1c.

5.11. Overall support and opposition

Overall support

5.11.1. Of those who responded to this question, the majority express overall support for the proposals.

5.11.2. Respondents feel that there is currently a lack of oversight, transparency and community engagement in tier 3 changes, and that decisions prioritise the interests of industry. They demonstrate this point using examples of previous changes which have caused significant disruption, such as flight concentrations at London City Airport. These respondents therefore support the proposals because they believe that they would bring more transparency, accountability and control over the tier 3 change processes.

5.11.3. Many respondents attach a caveat to their support. These mostly relate to requests for clarity on the respective roles of the CAA and ICCAN and assurance that decisions will be subject to suitable checks and audits.

Overall opposition

5.11.4. The main concern expressed is that the proposals are not robust or effective enough, particularly with respect to community engagement. Those expressing this concern are predominantly local authorities and community groups. They worry that change sponsors may not be held to account, leaving local communities with no real ability to

influence changes. This relates to the proposed 'light touch' approach, discussed further in 5.13.

“Any engagement with communities needs to be more than just paying lip service. It appears from previous consultations that the Government is ready to ignore objections/suggestions made by impacted people if it suits their overall strategy to do so. As such, it's difficult to have faith that communities will actually be listened to in practice”

Individual, User ID 5076

- 5.11.5. A few airports and airlines question the need for the proposals at all. These respondents note that community engagement already happens (for example through Airport Consultative Committees), and feel that the focus should be on improving existing mechanisms. They also believe that the proposals would create unnecessary bureaucracy. One respondent states that the introduction of PBN would reduce the number and potentially the requirement for tier 3 changes.
- 5.11.6. A small number of airports and aviation organisations note that tier 3 changes are normally out of their control, and that retrospective reporting may sensitise communities unnecessarily.
- 5.11.7. Other reasons for opposition include that the proposed process will not be transparent enough. A few respondents express concern about increased noise impact on communities as a result of tier 3 changes, particularly in previously unaffected areas.

5.12. Roles of organisations in administering tier 3 changes

CAA

- 5.12.1. Many respondents comment on the proposed role for the CAA, specifically, that it should put in place a suitable policy for change sponsors to follow in respect of tier 3 airspace changes.
- 5.12.2. A few respondents are supportive of this proposal. One suggests that CAA could aggregate information regarding traffic flows, and communicate it to local communities. While a few respondents feel that the CAA is well-placed to perform the role proposed for it, others believe that it would need additional enforcement powers to fulfil this role effectively, or that it must reform its current practice first.
- 5.12.3. Other comments are more overtly critical of the proposed role for the CAA. These respondents mistrust the CAA and question its independence from the aviation industry. Respondents cite decisions such as the adjustments to Gatwick's Route 4 as indicative of a perceived lack of independence in its decision-making.

ICCAN

- 5.12.4. Many respondents also comment on the proposed role for ICCAN – that it should support the CAA in disseminating best-practice and improving transparency.
- 5.12.5. The majority of those commenting on the proposed role for ICCAN are supportive. They feel that ICCAN would be an independent facilitator of community engagement and be effective in shaping policy for change sponsors. However respondents emphasise that it must be independent, and must be able to enforce its decisions. This is discussed further in Chapter 7:.
- 5.12.6. Respondents suggest additions or amendments to ICCAN’s proposed role. Many respondents, notably community groups and local authorities as part of a co-ordinated response, argue for a trigger point at which review by ICCAN should be required, for example a specific increase in traffic. A few others believe that ICCAN should be involved at an earlier stage in the process, and one respondent asks whether ICCAN will have a conciliation role as well as providing technical advice. One respondent believes that the role of ICCAN in tier 3 changes should be to aid communication and share guidance on good practice engagement. They say that it may sometimes be sufficient to just place a notice of tier 3 changes on airport websites, rather than contacting a large number of people who may not have otherwise noticed the change.
- 5.12.7. Very few respondents oppose the role for ICCAN. Those that do express concern that this new body would lack the power and independence to fulfil its role effectively, or that it would add another layer of bureaucracy to the process.

Government

- 5.12.8. A small number of respondents comment on what they believe the role of the Government should be in the tier 3 change process. A few emphasise the need for overall Government oversight, whereas one respondent believes that the Government should have no intervention role whatsoever.

5.13. ‘Light-touch’ approach

- 5.13.1. It is proposed that the CAA takes a ‘light-touch’ approach to setting out a policy for industry to follow. A clear majority of respondents commenting on this aspect of the policy are critical of it. Community groups and local authorities make up the bulk of these respondents. They believe that a ‘light-touch’ approach could too easily become a ‘hands-off’ approach, leaving industry with too much free rein. Indeed, a few respondents criticise phrasing used such as that industry should take impacts on communities into ‘due consideration’. One respondent notes that tighter control is needed because tier 3 changes are often incremental, and can eventually result in very significant impacts. Some respondents feel that leaving the overall decision on tier 3 changes with airports is undemocratic and suggest giving the CAA more powers to bring airports into compliance.

“As proposed, the CAA can simply say that they are taking a 'light touch' and leave the communities suffering without the Local Authorities able to grant any assistance whatsoever. That does not seem to us to be what democracy is about”

Community group, User ID 127459

5.13.2. A few respondents, mainly airports and airlines, support the ‘light-touch’ approach, believing it to be sensible.

5.13.3. A few other respondents ask for clarification of the approach.

5.14. Community involvement in the tier 3 process

5.14.1. Many respondents emphasise the importance of localised decision-making and community engagement, with a large number feeling that tier 3 change processes should include more public engagement. For example one respondent suggests that tier 3 changes should be subject to the same oversight as tier 2 changes.

5.14.2. Respondents argue that airports must communicate with local authorities and organisations such as National Park Authorities from the beginning of the process. Among these, a few respondents – including airlines, a business umbrella body and an Air Navigation Provider – suggest that information regarding changes in air traffic flows is made accessible to communities and other stakeholders. Some respondents note the importance of Airport Consultative Committees in this process. One respondent suggests that airlines should sometimes ease the burden from airports in terms of community engagement, while another suggests that engagement could be focused on those worst affected.

“Engagement with communities is not altogether easy, especially where that part of the community which receives the noise is cut off from the rest of the community by the noise. So those most affected are perhaps the ones we need to talk with and find fair ways of mitigating the noise impact”

Individual, User ID 140887

5.14.3. Conversely, a number of airports believe that consultation should be proportionate and not impede the normal working of the aviation industry. One respondent believes that the policy should be determined by national guideline and not by localised decision making.

5.14.4. Related to this, a few respondents suggest that the proposed process should be simplified, in order to speed it up. One respondent argues that this is particularly important because not all route growth is predictable. Another argues that the tier 3 proposals could potentially overregulate and over-formalise existing successful consultative arrangements.

- 5.14.5. A few respondents, including airports and airlines, suggest that reporting and engagement should be retrospective, as speculative forecasts or estimates could be misleading.
- 5.14.6. Some respondents would like clarification on the extent to which a tier 3 change can be reversed or mitigated.

5.15. Other comments on the Tier 3 process

Requests for clarity

- 5.15.1. Some respondents ask for further clarity on the proposed process overall, with a few reasoning that this would avoid giving local communities ‘unrealistic expectations’.
- 5.15.2. A few respondents ask for further clarity over what constitutes a tier 3 change, particularly as growth can be incremental over a long period of time. Respondents cite the changes at London City Airport as an example of where this has happened in the past.
- 5.15.3. A few respondents suggest that tier 3 is re-defined as ‘airspace usage’ or ‘operational changes’.
- 5.15.4. Some ask for the Government to be clear what changes are considered to be within a tolerance of natural variation. Others, all part of a co-ordinated response group, suggest that the Government should cap the extent of change that can occur under tier 3 airspace changes. Any change in excess of that cap could be redefined as a tier 2 change and therefore be more fully consulted on.
- 5.15.5. One respondent asks for more clarity on who is ultimately responsible for weighing up the economic and community effects. A few respondents emphasise that examples would be a useful way of clarifying points.

“The proposals for tier 3 airspaces changes require greater clarity, particularly around the definition of tier 3 airspace change. It is difficult to provide detailed comment without a clearer definition”

Business umbrella body, User ID 131363

- 5.15.6. It is requested by some that some of the terminology is clarified, for example that the phrases ‘suitable process’ and ‘best practice’ are defined further.
- 5.15.7. Respondents reiterate that it is difficult to comment before the regulatory process and its associated requirements have been decided. Some note that the process for change sponsors to follow is to be devised by the CAA, and ask for clarification as to whether there will be any further consultation once a process is proposed. Another respondent would like more information regarding the method which will be used to engage with local communities.

Transparency

5.15.8. Many respondents emphasise the need for the overall process to be transparent, one respondent suggesting that the proposals do not go far enough in this regard. However, another respondent cautions that over-prescriptive requirements in this area could lengthen the change process and prevent changes taking place. A few respondents suggest that the CAA should facilitate the process of making full information on airspace usage available to local residents.

Other comments and suggestions

5.15.9. Many respondents ask for certain areas to be prioritised. Some ask for local impact to be prioritised above economic interests. A few respondents emphasise the need to consider other factors, including: AONBs and National Parks; air pollution; and the development of routes to new markets.

5.15.10. A few respondents suggest a review period, to check whether information provided as a result of tier 3 policies is of value to communities. A couple of respondents also request an appeals process within the CAA's change process.

5.15.11. Some respondents make other suggestions regarding the tier 3 process. These include:

- the tier 3 process and decisions should satisfy the National Aviation Policy Framework objectives;
- policies on transparency, community engagement and where appropriate, mitigations, should be better enforced;
- the expected outcomes of changes should be defined as precisely as possible, including with the use of noise impact modelling;
- the improvements in environmental performance delivered by the introduction of new aircraft should be highlighted as part of the tier 3 related regulator reporting function;
- the merits of making tier 1 or tier 2 changes in order to mitigate the impacts of tier 3 changes should be considered carefully, both in terms of the accountability for making such mitigating changes and the assessment of their direct and second order effects.

5.15.12. Some respondents believe that further assessment, such as more noise contour studies and a Regulatory Impact Assessment, should be required as part of the process for tier 3 changes.

Airspace change compensation proposals (Q.1d)

5.16. Question 1d: Overview

5.16.1. Question 1d asks

Please tell us your views on the airspace change compensation proposals.

5.16.2. Four compensation proposals are made in the document:

1. Allow for the payment of financial assistance toward insulation regardless of whether a change in noise impact is attributable to an infrastructure development or an airspace change;
2. Allow for financial assistance towards insulation for all homes brought into the 63 dB LAeq level or above, regardless of the degree of change which has led to their falling within that contour;
3. Encourage airspace promoters to consider compensation for significantly increased overflights that occur as a result of the airspace change, based upon appropriate metrics; and
4. A requirement of an offer for full insulation to be paid for by the airport for homes within the 69 dB LAeq or above contour, where the home owners do not wish to move.

5.16.3. Question 1d received 316 responses. In addition, 58 respondents commented on the compensation proposals in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 1d and are included in the analysis below.

5.17. Overall support for and opposition to the compensation proposals

Overall support

- 5.17.1. Of those respondents who express a clear position on whether they support or oppose all of the compensation proposals, the majority are supportive, though nearly half of these express their support subject to one or more caveats. Reasons given for supporting the proposals include that they are seen as fair, thorough or that they address the issues of those affected by noise. Additionally, a few respondents express support for the principle of compensation for airspace changes in general, or express the view that they feel compensation is important.
- 5.17.2. Some express strong support for the (increased) cost of compensation being borne by the aviation industry, as this places the financial burden on those who make the changes. Some respondents hope that increasing compensation levels will force the

aviation industry to plan airspace changes more carefully, or simply put them off making changes at all.

- 5.17.3. The absence of a noise levy also receives support from a few respondents, often because it is seen as not properly taking account of local situations. However, a few other respondents express support for a noise levy. Some of these argue that a national noise levy, as proposed by the Airports Commission, would ensure that communities affected by aircraft noise from different airports would be entitled to consistent levels of compensation. Others state that such a tax would help fund mitigation and compensation or act as an incentive for airports and airlines to reduce their noise footprint on local communities, for example through the introduction of quieter aircraft.

Overall opposition

- 5.17.4. The majority of those that express clear opposition to the proposals consider them to be inadequate. Some comment that priority should be given to reducing noise in general, such as through the use of quieter aircraft or simply fewer of them, rather than allowing noise increases and then compensating for the impacts. One respondent considers that the need to compensate is effectively an ‘admission of guilt’ of wrongdoing. Some suggest that noise reduction and noise mitigation should be applied in tandem. A few suggest that compensation should only come ‘as a last resort’, if all attempts to avoid the impact have failed. A number of respondents make the more general point that no amount of compensation can make up for the effects of airspace changes on health, quality of life or the environment.
- 5.17.5. A small number of aviation organisations reject the proposals because of the fear that airspace design would become too heavily influenced by the desire to limit compensation, rather than on other priorities such as limiting noise or carbon emissions. Some say that this could lead to increased routing over rural areas, where there are fewer people to be compensated. Other respondents object on the basis that the costs may limit airport and wider economic growth or simply be passed on to the consumer, leading to higher air fares and holiday prices.
- 5.17.6. A few respondents express general opposition to changing the current compensation policy, without specifying further. A few others reject the proposals on the basis that they see the current compensation regime as adequate or that the new proposals lack ‘balance’.

5.18. Specific compensation proposals

- 5.18.1. Many respondents comment on the specific proposals listed above. Respondents express clear support or opposition for specific proposals, as well as putting forward specific suggestions or challenges.

Proposal 1: financial assistance towards insulation for changes in noise impact

- 5.18.2. With respect to proposal (1), the majority of respondents who express a clear position on this proposal indicate support. One respondent expresses clear opposition, without specifying further. One small business considers the proposal to be ‘excessive’ and ‘not proportionate’. This respondent comments that many of the changes which would trigger compensation under proposal (1) are due to changes in government policy (such as the introduction of PBN routeing), and that airports should not have to pay for compensation made necessary by government changes over which they have no control.

Proposal 2: financial assistance towards insulation for homes brought into the 63 dB LAeq level and above

- 5.18.3. With respect to proposal (2), the majority of respondents who express a clear position on this proposal oppose it in its current form, on the basis that the noise threshold is set too high. These respondents request that the threshold be lowered from 63 dB, though the majority do not state what they wish the threshold to be. Those who do, make a range of suggestions including 57 dB, 51 dB, 50 dB and 48 dB, with 51 dB being the most common, due to it being the same as the LOAEL proposed in Chapter 5 of the consultation document.
- 5.18.4. Other suggestions regarding this proposal include basing the compensation on other criteria, such as whether a resident is deemed to be ‘significantly’ affected; or on the basis of the health implications of the noise experienced, rather than the numerical amplitude of noise itself.

Proposal 3: Consider compensation for significantly increased overflight

- 5.18.5. With respect to proposal (3), the majority of respondents who express a clear position on this proposal oppose it in its current form. The majority of these comments relate to the specific wording of the proposal. Many of the respondents who comment disagree with the words ‘encourage’ and ‘consider’, commenting that the phrasing is too weak and leaves open the option for airspace change sponsors to ignore the proposals. These respondents suggest that the compensation should instead be mandatory. A few respondents suggest that the expectation that airspace change promoters will adhere to this proposal voluntarily constitutes an abdication of responsibility on the part of the DfT.
- 5.18.6. Others comment that ‘overflight’ as well ‘significantly increased’ are not defined, or are not defined in a manner which is clear and satisfactory to them. Many of the criticisms, especially that the perceived ‘weakness’ or ambiguity of phrasing with regards to eligibility criteria and compliance with the proposals, are applied to the compensation proposals more widely.
- 5.18.7. One air navigation service provider expresses concern about the lack of a recognised trigger or definition of overflight in relation to the policy proposal for airspace promoters to consider compensation for significantly increased overflights. They

comment further that this lack of definition could cause confusion and this could lead to poor airspace design, and that a better definition is needed so that airspace change sponsors can forecast costs and manage stakeholder expectations.

Proposal 4: Full compensation for homes within the 69dB LAeq contour

- 5.18.8. With respect to proposal (4), relatively few respondents express a clear position, with those that do mostly opposing it in its current form. As with proposal (2), most who comment request that the threshold be lowered. The majority do not indicate a value that it should be lowered to. The few that do make suggestions ranging between 30dB and 65dB.

5.19. Compensation criteria

- 5.19.1. Many respondents comment on the criteria used to trigger compensation.

Lower/more accurate noise levels

- 5.19.2. Many respondents request that the noise criteria be lowered, i.e. that the relevant noise contours and consequent compensation eligibility be expanded to cover more people. Most do not specify what they wish the criteria to be, though a few suggest that the criteria should be based on WHO guidelines, some specifying that it should therefore be based on a 50dB LAeq (8 hour) measure.
- 5.19.3. Some respondents criticise the ways in which noise is measured and calculated in the compensation criteria. A few criticise the use of average noise levels (such as LAeq and Lden), arguing that averaging the noise level over 8 or 16 hours does not capture the full experience of noise, such as the volume of individual noise events. Others argue that this does not properly take account of respite, or the effects of PBN. Views on noise metrics are reported on in more detail in Chapter 6: of this report.
- 5.19.4. In order to solve the problems described above, a few respondents suggest using supplementary metrics to decide compensation eligibility, such as N70, LAeq 1hr, LAeq 4 hour or Lmax. Another respondent suggests using an additional criterion regarding noise amplitude at night.
- 5.19.5. A few respondents suggest that compensation be based on the difference in noise level experienced before and after airspace change, rather than simply the final noise level experienced after the airspace change has been made. A similar suggestion is that different criteria should be applied in urban and rural environments, due to the differences in typical background noise. One respondent comments that a rural environment could receive a significant noise increase of, for example, 22dB, which would greatly impact residents, but which might still not cross the 63dB threshold due to the low baseline of ambient noise.

Compensation area

- 5.19.6. Some respondents express concern that the proposed criteria will not cover specific geographical areas, despite the view that residents of those areas consider

themselves to be significantly affected by airspace noise, either in general or due to recent changes.

- 5.19.7. However, a few business umbrella bodies and an airport suggest that compensation should not be paid to individuals who move to an area where a planned airspace change has already been consulted on and/or published, i.e. those who were in a position to find out about the airspace change prior to purchasing their home. One airport emphasises the importance of information about airspace changes, which might affect noise levels, being passed on to planning authorities and subsequently to developers. Additionally, one local authority suggests focussing compensation on schools, health-related premises and places of religion, rather than a policy covering all those within a specified noise contour.

“Where an airport’s intentions for expansion or changes to the airspace and/or routings had been published, local planning authorities should have ensured that all developers were aware of any intended changes and this information should have been passed onto purchasers by the developers. Where this has not been done, the purchaser should be invited to claim against the local authority, the developer, or their solicitor for not providing information that could have informed their purchasing decision.”

Airport, User ID 4381

- 5.19.8. A small number of respondents request that the new compensation policy be applied retrospectively to those affected by recent changes, including where concentration has been implemented. Others emphasise the importance of including tier 3 changes in the compensation proposals.

Consideration of non-noise impacts

- 5.19.9. A few respondents draw attention to non-noise effects of airspace changes, such as effects on health, air quality, the environment and ‘loss of amenity’; and request that compensation also be provided for these. However, most respondents do not specify what compensation should be offered, other than a suggestion of health insurance.

Requests for clarification

- 5.19.10. A few respondents comment that the criteria are too vague, with others requesting further detail about how the proposed criteria were determined or what impacts the changes will have. As with other aspects of the consultation documents, a few respondents comment that the meaning of the specified noise criteria might not be clear to people lacking the relevant technical knowledge.

“A figure of 69dB LAeq level is difficult for ordinary people to understand.”

Individual, User ID4915

5.19.11. A few respondents ask how residents are expected to know what noise level they are experiencing due to aircraft, whether they are entitled to compensation or how to apply for it.

5.20. Amount of compensation

5.20.1. A few respondents comment that compensation proposals do not go far enough, and that compensation should be ‘in full’ instead of providing ‘assistance’ or ‘a contribution’. A few respondents, as part of a co-ordinated response, go on to list a number of components of what they deem to constitute ‘full compensation’.

“The components of full compensation should include Council Tax and local precept reductions (or rate relief) funded by the industry, payments to public buildings like schools and hospitals, diminution in value of property and meaningful packages to address the health, environmental and loss of amenity impacts of aviation noise. In cases of severe impact landowners should additionally have the right to sell their properties to the relevant airport at pre-impact values together with associated costs.”

Community group, User ID 124818

5.20.2. Others suggest that the compensation should be proportional to the impact.

5.20.3. A few respondents, mostly as part of a co-ordinated response, suggest that compensation should be based on the provisions of the Land Compensation Act. Others suggest the Act should be altered to include airspace changes. Respondents interpret the Act, as applied to airspace changes, as entitling those affected by noise changes to compensation for any loss of property value, plus 10%.

5.20.4. Many respondents emphasise the extent to which they believe noise changes can devalue property, both through direct impacts to residents and the publication of changed noise contours. Suggestions vary regarding how to compensate for loss of property value, including:

- value of property plus relocation cost;
- value of property;
- relocation cost;
- one third of value of property; and
- lost value of property.

5.20.5. However, one respondent comments that even a compensated homeowner may still struggle to find a buyer, and therefore be ‘trapped’ under a flightpath.

5.20.6. Some respondents criticise the comment in paragraph 4.40 of the consultation documents that, ‘*the expected financial benefits of any airspace change will inform whether and at what levels compensation may be realistic.*’ More than one

community group challenges this, arguing that if the financial benefits of a proposal are calculated to be insufficient to enable compensation, then the proposal should not proceed.

- 5.20.7. Two airports request that compensation arrangements involve some flexibility, in order to reflect local circumstances.

5.21. Who pays for compensation

- 5.21.1. The question of exactly who should pay for compensation and exactly how the compensation mechanism will work is also raised by some respondents. A few criticise what is seen as a lack of clarity on these points in the consultation document.
- 5.21.2. Various suggestions are made as to who should pay for compensation, including airports, airlines, the airspace industry, the airspace change sponsor and passengers. However, some respondents comment that any extra cost to airports or airlines will inevitably be passed on to passengers anyway. Many respondents, some of whom are part of a co-ordinated response, state that the ‘polluter pays’ principle should be applied to airspace compensation.. More broadly, a few respondents suggest that those who benefit from an airspace change should pay for the compensation of those who are impacted.
- 5.21.3. Many respondents express concern that airspace change sponsors will not actually pay the compensation they are liable for and, therefore, that compliance with compensation policy needs to be monitored and enforced where necessary. A few suggest that those liable for compensation should be fined if they are found to have not met their obligations.

“The compensation proposals are too weak. Airspace promoters should be obliged, not merely encouraged, to compensate the people whose lives are disrupted by aircraft noise.”

Community group, User ID 131237

5.22. Use of insulation as compensation

- 5.22.1. Many respondents comment on the principle and practicalities of insulating buildings against noise. A few respondents express general support for the practice, or alternatively comment that such practice is inadequate, without specifying further.
- 5.22.2. More specifically, many of the respondents who comment on this topic criticise the use of building insulation, such as double or triple glazing, as a means of compensation. By far the most common criticism relates to the view that, for building insulation to be effective, the windows and doors always need to be closed. Respondents comment that this effectively means that the only way to receive the benefits of building insulation is to remain indoors and live in a ‘sealed home’. Respondents also note that insulating buildings does nothing to alleviate the

experience of noise outside, such as in the garden or school playground, and that the tranquillity of communities would still be impacted.

- 5.22.3. A few respondents comment that not all buildings are eligible for insulation, including listed buildings and those in conservation areas. Others comment, sometimes referring to their own experience, that building insulation is an inadequate measure for achieving sufficient noise reduction.
- 5.22.4. Respondents put forward a number of suggestions with regards to the implementation of building insulation. These include:
- the possibility of providing air conditioning as well as insulation;
 - not restricting insulation provision to a particular company; and
 - developing new forms of windows and sealing that provide better protection against noise.
- 5.22.5. In terms of exactly who receives compensation for building insulation, concern is raised that if a present owner chooses not to insulate their property, that future owners might be penalised, as they may not be eligible for compensation for a past airspace change. Therefore the suggestion is made by some respondents that compensation should be based around the buildings, not the residents, affected, i.e. that the principle be about noise mitigation, not compensation to individuals.

5.23. Other comments on how compensation is made

- 5.23.1. In terms of exactly how compensation is made, many respondents appear to be unclear as to whether compensation will take the form of payment made to individuals affected or whether compensation will only be paid specifically for changes made to alleviate the effects of noise, through noise insulation or moving house.
- 5.23.2. Some respondents suggest council tax breaks as a mechanism for compensation payment, for example through tiered council tax bands based on noise. Houses in high noise areas would be in lower bands, with the band of a dwelling being adjusted if an airspace change is made. Thus, a household whose noise impact increases would move into a lower council tax band, which would partially compensate for the impact.

5.24. Other comments

- 5.24.1. Finally, a few respondents suggest that an independent body, such as ICCAN, should be involved in the compensation process, although none describe exactly what role such a body should play.

Chapter 6: Making Transparent Airspace Change Decisions

6.1. Introduction

- 6.1.1. Questions 2a and 2b relate to proposals set out in Chapter 5 of the consultation document: Making Transparent Airspace Change Decisions. In particular, these questions ask for respondents' views on two sets of proposals set out in this chapter affecting the way in which aviation noise is considered within the airspace change decision making process. These are options analysis and the assessment of noise respectively.

Options analysis (Q.2a)

6.2. Question 2a: Overview

- 6.2.1. Question 2a asks:

Please provide your views on the proposal to require options analysis in airspace change processes, as appropriate, including details provided in the Draft Air Navigation Guidance.

- 6.2.2. Options analysis refers to the comparative appraisal of different policy options based on their costs and benefits. This methodology is currently used as part of many government regulatory and transport investment decisions, as well as to some extent for airspace changes. One of the proposals set out in Chapter 5 of the consultation document is to make it a formal requirement for airspace changes to be informed by options analysis, in line with government best practice in other areas.

- 6.2.3. Question 2a received 288 responses. In addition, 278 respondents commented on options analysis in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 2a and are included in the analysis below.

6.3. Overall support and opposition to options analysis

Overall support

- 6.3.1. Of those respondents who express a clear position on whether they support or oppose the proposals on options analysis overall, the majority are supportive. Many of these respondents are supportive in a more general sense of the principle of options analysis being used to inform airspace changes, without elaborating further. Some of these respondents add a caveat to their response, reflecting some of the concerns or suggestions covered in the rest of this chapter.

- 6.3.2. Particularly within comments in response to question 2a, a large number of respondents simply state agreement or satisfaction with the proposals without commenting further. Those who do elaborate on the reasons for their support often agree that this approach would contribute to the stated aims cited in the consultation document: namely increasing transparency in the airspace change process, as well ensuring that noise has been properly taken into account in airspace change decisions.

“The idea of transparent options analysis is a good one, and will go a long way towards reassuring communities that decisions are being made on a rational and fair basis.”

Individual, User ID 4485

Overall opposition

- 6.3.3. Only a small number of respondents indicate explicitly that they are opposed to options analysis and these do not explain their opposition with reference to the proposals set out in the consultation document.
- 6.3.4. However, many respondents – including some who are supportive in principle- raise specific concerns in relation to options analysis and comment on issues they feel need to be considered. These include:
- concentration and dispersal of flight paths as a result of airspace change decisions;
 - transparency and community involvement in the airspace change process;
 - equality issues in the use of options analysis; and
 - specific suggestions on the process and methodology of options analysis.

6.4. Concentration and dispersal

- 6.4.1. Respondents often comment on the need for options analysis in the context of criticism of previous airspace change decisions, questioning the basis on which such decisions have been made and highlighting the impacts these have had on many local communities.
- 6.4.2. In particular, respondents are critical of the concentration of flight paths over certain areas following recent airspace changes - partly as a result of the introduction of more accurate routeing made possible by Performance Based Navigation (PBN). They argue that certain areas and communities have become disproportionately affected as a result of concentration, both in terms of noise experienced and related impacts on health and quality of life. One community group uses the term ‘noise sewers’ to describe the areas affected by concentration. Many respondents express concern about the impacts of concentration on local communities, describing the practice as ‘unfair’ and underlining the negative impacts of noise experienced as a result.

- 6.4.3. This issue is often raised by individuals and community groups, but also in responses from local authorities.

“Gatwick has implemented PBN on all its departure routes which have generated a huge reaction from the community with the resulting concentrated flight paths against the former more dispersed flight tracks”

Local authority, User ID 127436

- 6.4.4. In commenting on the impact on local communities, many respondents mention specific changes which have resulted in the concentration of flights from airports including London City, Luton, Heathrow, Gatwick and Edinburgh; as well as flight path changes such as that to Gatwick Route 4. Respondents express frustration in regard to a perceived lack of notification about these changes and their inability to influence them. Particular communities and areas mentioned as being affected by concentration include Billingshurst, North Romford, Molesey, Englefield Green, Leyton, Wanstead and Hertfordshire.
- 6.4.5. Those critical of concentration are generally supportive of options analysis for allowing consideration of alternative options to help ensure that certain communities are not disproportionately affected. Many express support for an alternative approach based on dispersion, which they feel is implied by options analysis. However, a smaller number of respondents note the proposal in Chapter 5 of the consultation document that concentration will still be preferred below 4,000 feet. Most of those who comment on this policy are critical of it, though a small number of airports do support it in principle.
- 6.4.6. The majority of those who express views on concentration and dispersion are in favour of dispersion. Community and environment groups and local authorities in particular advocate dispersion, though a few community groups express a preference for concentration.

“However, as stated in Question 2a, we believe the options appraisal system should be designed in such a way that it favours proposals whereby significant impacts are spread over multiple routes, rather than concentrated to single routes, wherever possible”

Local authority, User ID 131341

- 6.4.7. On similar grounds, many respondents also express support for recognition of the need to provide relief or respite to overflown communities. While some suggest this could be done through a system of rotating alternative flight paths over certain days of the week, or on a weekly basis, most simply advocate dispersion as a means of achieving this.

6.4.8. In contrast to those arguing for dispersion, a few respondents argue that the options analysis process should not lead to new areas being overflowed. Respondents argue that house buyers have made decisions based on the noise situation at the time of purchase, and hence those who have chosen to live in areas which were not overflowed at the time of purchase should not be affected by new noise due to dispersion or other airspace changes. One respondent highlights the trade-off involved in providing respite for affected communities and increased impacts on others not currently affected. (Other comments on equality issues relating to options analysis are summarised in 6.6)

“PBN technology, resulting in concentration, is not popular but neither is dispersion to those newly affected or experiencing re-distributed noise. The industry seems keen on multiple flight paths whereby use is rotated thus creating respite. However, respite comes at a cost to those who experience a new flight path.”

Community group, User ID 139354

- 6.4.9. Based on their own computer modelling of splitting one concentrated flight path into two, one community group states that although the noise level directly below the original flight path would be reduced (by 3dB in their example), the noise experienced under the new path would increase by a greater amount (7 dB in their example), suggesting that dispersion could lead to a net increase in noise. They go on to comment that this net increase in noise could lead to a net increase in the associated impacts on health and quality of life, especially as some areas will be overflowed for the first time – an issue which they argue needs to be taken into account in the debate over concentration and dispersion.
- 6.4.10. A small number of respondents suggest that developers should make house buyers aware of the possibility of future airspace changes which could affect noise levels at their property.
- 6.4.11. Another concern raised in relation to the consideration of alternative flight paths through options analysis is the possibility that the publication of rejected options could lead to property blight. A few respondents express the concern that even if an option had been rejected, awareness of the fact that a flight path was considered above a community could affect house prices due to fear that it might be implemented in the future.

6.5. Transparency and community involvement in airspace change decisions

- 6.5.1. Many respondents are supportive of options analysis due to the belief that it would increase transparency, enabling communities to understand the basis on which

airspace change decisions are made, as well as to influence and challenge these decisions.

“The requirement for the sponsor to provide a number of options and to argue the case for each one before recommending the preferred route is one of the good updates that are being proposed. This transparent approach should allay suspicions that might be engendered by those who will be most affected”

Individual, User ID 131389

- 6.5.2. Again, these comments are often made in the context of criticism of past airspace decisions, most frequently those involving concentration of routes near various London airports. Respondents highlight a perceived lack of consultation with communities around these decisions, despite the impacts that concentration has had on them.
- 6.5.3. In this context, there is broad support, including from airports, local authorities, community groups and individuals, for greater community engagement and involvement in airspace change decisions through the options analysis process. However, specific suggestions as to how this should be achieved and the exact role of communities in airspace change decisions vary.

“I support the use of options analysis – both in terms of the technical ability to explore and assess different viable models, but also the opportunities it provides for community engagement.”

Individual, User ID 4956

- 6.5.4. A few individuals and community groups specifically request that communities be consulted on airspace changes. Another group of respondents feels that communities should have a greater, deciding role in these decisions, for example suggesting that they have a 51% say in decisions that affect them, or that communities should be able to make the final decision themselves or veto options put forward. By contrast, some envision a more modest role for communities, arguing only that they should be kept fully informed about what decisions are being made and why. Some respondents believe it is important that the Government should have the final say.
- 6.5.5. At the level of principle, a number of respondents simply underline their belief in the need for the options analysis to be fair, transparent and unbiased. In this context, some state that options be presented to communities in a manner easy for them to understand.

6.6. Concerns about impartiality in the options analysis process

- 6.6.1. Respondents raise a number of issues in relation to the way in which different interests will be accommodated in the options analysis process, in some cases expressing concern that this will be inequitable and so lead to unfair outcomes.
- 6.6.2. A number of respondents, many of whom are part of a co-ordinated response (Gatwick Area Conservation Campaign), express concern that an options analysis process could inadvertently set communities against each other, due to the possibility that all would wish any new route option to be as far away from their own community as possible, and thus inevitably above another community instead. They note the possibility that in such instances certain communities may be able to overrule others (through the exertion of numbers of complaints). Some suggest the need for safeguards to be built into the process in order to avoid this.

“...the choice of options would tend to set community against community. Any consultation on options should make it clear that it is not a public opinion poll based on the number of votes.”

Community group, User ID 5102

- 6.6.3. Another concern raised with regards to the options analysis process is that industry will be given too much influence, with the process potentially biased towards commercial needs and away from community desires.
- 6.6.4. Other concerns around impartiality in the options analysis process relate to how different areas are likely to be affected. As mentioned above (6.4.8), a few respondents also comment on issues of fairness in relation to how different areas are likely to be affected as a result of decisions around concentration and dispersion. Many respondents also raise the issue of how options analysis might take account of whether possible options are above urban or rural areas. Some of these respondents argue that the options analysis process, coupled with the policy of minimising the number of people significantly affected by aircraft noise, should not be used to justify increased routing of aircraft over rural areas. These respondents often argue that that aircraft noise is perceived as having a greater impact in rural areas, which typically have lower background noise and are therefore seen as being more ‘tranquil’, than urban ones. As a result of this distinction, they believe overflight of urban areas is less noticeable and causes less annoyance.

“Villages again are areas generally of low ambient noise so the impact of having a plane diverted away from a town with relatively higher ambient noise level is not a fair and equitable for the increased aircraft movements being forecast.”

Local authority, User ID 131344

- 6.6.5. A few community and environment groups state that AONBs and national parks in particular should be avoided for this reason. One respondent expresses concern at the proposed use of HMT Green Book guidance in this context, arguing that this places insufficient value to the status of AONBs and National Parks.
- 6.6.6. A small number of other respondents express a preference for overflight of rural areas, either on the basis that this would decrease the number of people affected by noise, or that the burden of noise be shared between urban and rural communities.

6.7. Specific comments and suggestions on the options analysis process

- 6.7.1. Respondents put forward a range of specific suggestions with regards to the options analysis process in the context of airspace change decisions.

Applicability of options analysis

- 6.7.2. In terms of the range of airspace changes to which options analysis will be applied, a few airports, airlines and air navigation providers' respondents suggest that options analysis only be applied to tier 1 airspace changes.
- 6.7.3. Meanwhile, many respondents, including community groups, local authorities and individuals, enquire as to whether options analysis has been, or will be, applied to recent or present proposals, including the Draft Airport National Policy Statement on expansion in the South East of England. A few also suggest applying the process retrospectively to past airspace changes.

“but what about current airspace arrangements for which there continues to be significant public concerns that have not been subject to such an options analysis and where such options would provide significant noise reduction benefits for the community at large.”

Individual, User ID 4915

Transparency and community involvement

- 6.7.4. One of the main set of suggestions put forward relates to data and transparency. A broad range of respondents, including individuals and various organisations - airports, community groups, local authorities and an airline- emphasise the need for the data involved in the options analysis process to be published. Some specify that this should include details of the options considered and their predicted impacts and reasons for options being discounted. A small number of respondents suggests that this information should be presented as part of a clear and complete audit trail of the process, from beginning to end.

“However, when a final decision is reached on a route all of the options considered must be discussed in detail in the final document, including the reasons for certain options being scoped out. In addition, all of the input data used in the assessment of these options must also be made publicly available so that they can be reviewed by a third party if necessary.”

Local authority, User ID 119741

6.7.5. Many of these respondents also underline the need for this data and information to be made available to local communities in an accessible format. Among these, one local authority notes that given the complexity of the process a clear and easy to read summary would be useful.

6.7.6. A few environment groups, community groups, local authorities and individuals also request that once an option is chosen, that a schedule of flights be created and published, so that communities will know when they will be overflown and when they will experience respite.

Range of options to be considered

6.7.7. Respondents put forward a number of suggestions relating to the number of options that should be considered as part of the options analysis and the criteria for deciding which options are considered.

6.7.8. Some respondents, including local authorities, statutory bodies, a community group and individuals, believe that options analysis should include ‘all options’, i.e. that the options should not be restricted in any way. A small number of other respondents argue that the list of options should include a ‘do nothing’ option, in order to acknowledge that airspace changes should not be considered inevitable - especially in instances where these might impact new communities.

6.7.9. In contrast to those who feel that all options should be included as part of the analysis, a number of airports, airlines and air navigation providers request that change sponsors not be required to put forward options which they deem not to be technically feasible or realistic.

“We see no requirement to include options that are not feasible - perhaps on operational or technical grounds - simply to provide a range of potential airspace solutions. If there is only one feasible option then the policy needs to be flexible enough to provide mitigation.”

Airline, User ID 124824

6.7.10. A few respondents, including airports and an air navigation provider, suggest that there should be a preliminary stage of the options analysis process, the purpose of which would be to reduce all possible options to a list of all feasible options, based on technical criteria and experience. Some of these respondents argue that it would be impractical and unnecessary for change sponsors to engage with communities in this

initial stage of the process in light of the amount of technical information involved, as well as the potentially needless worry likely to be raised by options discounted at this early stage. As such they suggest that communities would be involved in the process of choosing between the remaining options identified as feasible.

“However, consultation on any initial high level assessment should be limited to avoid causing undue worry amongst those properties that would not have been overflown before. Greater certainty on the pros and cons of any options would need to be investigated in greater detail first.”

Airport, User ID 4376

6.7.11. Similarly, a few respondents argue that given the time and cost involved in choosing and analysing options, the analysis of options should begin at a high level only, with more detailed analysis only being applied once unfeasible options have been discounted.

6.7.12. A small number of respondents suggest that ICCAN should be involved in the options analysis process.

Altitude-based priorities

6.7.13. In relation to how noise impacts should be taken into account in the options analysis process, paragraph 5.21 of the consultation document states that these will be balanced alongside other considerations – particularly impacts on carbon and air quality - in line with the government’s existing policy on altitude based priorities (ABPs). This policy, states that below 4,000 feet amsl (above mean sea level), noise will be the primary consideration; between 4,000 to 7,000 feet amsl, noise will be balanced alongside other considerations; and above this altitude, noise will be considered less of a priority.

6.7.14. In responses to question 2a, some respondents comment on the suitability of the ABPs in this context. Of these, a small number of respondents are supportive of the application of the ABPs, one of these describing it as a transparent and pragmatic approach.

“We support the continued use of the altitude based priorities where noise is accorded greatest weight below 4,000 feet, emissions given greatest weight above 7,000 feet and these issues being balanced in between. This is a simple, transparent and pragmatic approach”

Airport, User ID 131391

6.7.15. However, the majority of respondents who comment on the policy are critical. Some of these merely challenge the ABPs in general, without elaborating further. Other respondents - particularly local authorities - comment that the altitudes chosen in the

ABPs appear to be arbitrary, with no clear link between the volume of noise at ground level and the altitudes at which noise priorities change. A few respondents suggest that the relationship between noise and altitude be re-assessed, taking into account information such as the relationship between altitude of flight path and complaints received, or the relationship between altitude and likelihood of breaching the proposed LOAEL⁵.

“The Government still has to explain the scientific basis which underpins its current altitude based priorities”

Local authority, User ID 5270

6.7.16. Many respondents comment that aircraft noise can still have a significant impact above 4,000 feet amsl, often referring to their own experience. A small number of respondents allege that A380s departing Heathrow are breaching ABPs by climbing slowly at low altitudes, in order to conserve fuel and reduce engine wear. They comment that this results in a greater noise impact below 4,000 feet. Whilst acknowledging the impact of carbon emissions, these respondents argue that noise should remain the key priority above this altitude. Whilst some do not specify a specific altitude to which noise should still be considered the main priority, a few respondents specifically request that noise be the main priority up to 6,000 or 7,000 feet, or simply that noise should always be the priority wherever it generates concern on the ground from communities. Whereas requests for 6,000 feet come almost entirely from individuals, requests for 7,000 feet come from a few local authorities, community groups and a statutory body, as well as individuals.

6.7.17. Some respondents also challenge the consideration of altitude above mean sea level. They argue that this measure is misleading and disadvantages those who live at higher altitudes, as the relative altitude of planes above these communities would be less than the altitude stated as an amsl value.

Other comment on priorities in the appraisal criteria

6.7.18. Without making reference to the ABPs, some respondents also put forward suggestions as to criteria they feel should be prioritised or given greater weight when choosing between options. These include the environment, climate change, the national interest, safety and sustainable development.

⁵ Lowest Observed Adverse Effect Level: This is the level above which adverse effects on health and quality of life can be detected; The Government proposes that that 51dB LAeq 16hr should be regarded as the LOAEL for daytime noise and 45dB Lnight should be set as the LOAEL for night time noise.

- 6.7.19. Some respondents also express concern about the way in which different priorities will be balanced within the options analysis process, particularly that noise impacts on local communities would not be given sufficient consideration.
- 6.7.20. A few respondents express specific concern that airspace changes will continue to be focused on increasing capacity and mitigating the impact of an increasing number of flights, rather than providing respite for communities currently affected. They argue that options analysis should inform an alternative policy of noise reduction. One of these respondents suggests that options analysis be used as part of a health-based noise-reduction strategy.

“There should therefore be a health-based noise-reduction strategy. To date, airspace changes have often being pursued in order to facilitate growth, and the proposed revised process appears to be designed only for facilitating discussion about the least bad option for communities.”

Local authority, User ID 131283

- 6.7.21. A few respondents, who are part of a coordinated response, express concern about the addition of the words “in support of sustainable development” to the government’s policy on sharing the benefits of noise reduction between industry and communities. They express concern that this policy was originally focused on promoting noise reduction through technological advance, but that the addition of this term will be used to justify the expansion of air travel in spite of increased noise impacts. These respondents include local authorities, environment groups and individuals.
- 6.7.22. A few community groups and local authorities as part of a co-ordinated response request that options analysis be carried out subject to a noise limit on options, with any options which are predicted to break such a limit being automatically discounted or, if necessary, ‘urgent mitigating action’ being taken and paid for by the airport concerned.
- 6.7.23. Finally, a number of respondents express a general desire for the options analysis process to be based on as much research and evaluation of the impacts associated with different options as possible.

Assessing the impacts of noise (Q.2b)

6.8. Question 2b: Overview

6.8.1. Question 2b asks:

Please provide your views on 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 Air Navigation Guidance.

6.8.2. In support of the Government's policy 'to limit, and where possible, reduce the number of people significantly affected by aircraft noise', Chapter 5 sets out a number of proposals in relation to how aircraft noise is measured in the context of appraising options for airspace change. The proposals include the introduction of a risk-based approach to noise assessment, a methodology for assessing the impacts of aircraft noise in relation to health and quality of life impacts and the introduction of additional metrics in relation to the frequency of noise events.

6.8.3. Question 2b received 309 responses. In addition, 251 respondents commented on the assessment of noise in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 2b and are included in the analysis below.

6.9. Overall support and opposition for the proposals

6.9.1. Overall, of those respondents who express a clear position on whether they support or oppose all of the above proposals, the vast majority are supportive. Many of these simply state their support for the proposals, or for the principle of refining and improving the assessment of noise more generally. A few respondents comment that these changes to the way noise is assessed are overdue.

"These are welcome additions and we support the general approach."

Statutory body, User ID 116261

6.9.2. Only a very small number of respondents indicate explicitly that they are opposed to the proposals. However, a few other respondents question the purpose or value of the proposed new metrics in terms of their impact on the decision making process. Generally these respondents question how these supplementary metrics will be taken into account or suggest that further clarity is required on this. Others comment on the importance of proposals being implemented and complied with, in some cases expressing concern about whether they will be. A small number are more negative, expressing the view that an outcome is not changed by measuring it.

“Frequency of overflight is stated as being ‘one of the factors taken into account when airspace decisions are made’ but the guidance does not commit to serious consideration of aircraft numbers in assessing the overall significance of a change.”

Local authority, User ID 4353

6.10. Government policy on airspace noise and approach to assessment

- 6.10.1. The consultation document explains that in order to support the Government’s overarching policy on aviation noise (‘to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise’), there is a need to better define what it means to be ‘significantly affected’ in the context of aviation noise.
- 6.10.2. A number of respondents - including community groups, local authorities, airlines, airports, businesses and individuals - express support in principle for the policy of reducing the number of people significantly affected by aviation noise.

“It is reassuring to see the proposals clarify the Government’s objectives on limiting and where possible reducing the number of people significantly affected by aircraft noise.”

Local authority, User ID 131289

- 6.10.3. However, a few community groups and local authorities challenge the wording of this policy, noting that both the words ‘limit’ and ‘significant’ are undefined in the consultation document, which would make it impossible to determine if this policy has been met. One respondent suggests that a more meaningful policy in this regard would be a commitment to avoiding exposure to any noise levels above those set out by the World Health Organisation (WHO).

6.11. Measures of aircraft noise levels: assessing adverse effects of aviation noise

- 6.11.1. The consultation document explains that there is a need to update and refine the Government’s approach to assessing the adverse effects of aviation noise. The current approach uses one metric to mark the onset of significant community annoyance⁶.
- 6.11.2. The first of the proposals set out in Chapter 5 involves replacing this one metric with a new approach to assessing adverse effects of aviation noise. The proposed approach is that adverse effects should be assessed using a risk-based approach above a Lowest

⁶ The Government currently considers a daytime aviation noise level of 57dB LAeq 16hr as marking the approximate onset of significant community annoyance.

Observed Adverse Effect Level (LOAEL) of 51dB LAeq 16 hr during the day, and 45dB LAeq 8 hr at night. The LOAEL is the level above which adverse effects on health and quality of life can be detected. It is proposed that using this approach, rather than one metric above which noise is considered significant, better reflects the subjective nature of how individuals experience and are affected by aviation noise. This approach is also proposed in order to avoid the assumption that communities will only be affected once a given level of noise is reached. Further details of this can be found in Chapter 5 of the consultation document.

- 6.11.3. Many respondents who comment on noise assessment metrics are critical of the existing 57dB metric, often implying or stating explicitly that they support its replacement as proposed in the document. However, a small number of local authorities and community groups suggest continuing to use this metric in tandem with the proposed new metrics, in order to enable comparisons to previous airspace changes which have been measured with respect to this level of noise.

“The Council welcomes the acknowledgement that use of the 57dB LAeq contour as representing the onset of significant community annoyance is outdated, although continued use of the contour as part of noise analysis should continue for benchmarking purposes.”

Local authority, User ID 4831

Support for the proposed LOAEL metric

- 6.11.4. A few respondents express support for the principle of using a LOAEL as part of the broader risk-based approach to noise assessment proposed.
- 6.11.5. Many respondents express agreement with the specific daytime and night-time values proposed for the LOAEL: 51dB LAeq 16hr and 45dB Lnight. Some of those who comment further note that these values are consistent with WHO guidance.

The proposal to use 51dB LAeq 16 hr as the point at which there is Lowest Observed Adverse Effect Level (LOAEL) for daytime noise and a LOAEL of 45dB Lnight for assessing aviation noise impacts at night are welcomed as these are consistent with the World Health Organisation's guidance on assessing aircraft noise impacts.

Local authority, User ID 131394

- 6.11.6. A few respondents would like the upper and lower thresholds of No Observed Effect Level (NOEL) and Significant Observed Adverse Effect Level (SOAEL), as mentioned in the consultation document, to be included in the proposals: indeed, a small number of respondents interpret the proposals as including these thresholds already.

Criticisms of the proposed LOAEL metric

- 6.11.7. Some of the criticisms put forward of the LOAEL also relate to the other metrics proposed. These concerns focus on its appropriateness as an indicator of the true impact of aviation noise and are summarised in more detail below (see 6.13).
- 6.11.8. Some respondents challenge the level at which the LOAEL is proposed to be set - 51dB LAeq 16hr - or suggest this to be changed on a number of grounds. A few of community groups and local authorities feel the proposed level is not low enough, and therefore would not encompass some people who would still consider themselves to be significantly affected by aircraft noise. Among these, one community group suggests that Penshurst is significantly impacted by aircraft noise, but would not fall within the LOAEL. They suggest that other indicators should be factored in to obtain a more accurate lower limit.

“This implies that the definition is not reliable indicator of community impact: residents of Penshurst and the surrounding countryside have been severely impacted by aircraft noise since arrival flight paths were concentrated in 2013. The Government should therefore consider this limit again, including by comparing noise contours with complaint data and taking account of ambient noise.”

Community group, User ID 124818

- 6.11.9. By contrast, a small number of airlines, airports and air navigation providers express concern that lowering the threshold from 57dB to 51dB will bring a much greater number of people within the noise contours, diverting the focus of attention away from those most significantly affected.
- 6.11.10. While not opposed to the value proposed for the LOAEL, a few respondents suggest that the metric be averaged over a shorter time period: namely, 4 hours as opposed to 16 hours. They argue that this would better represent the true impact of aircraft noise on communities, particularly as a result of concentrated flight routes. As discussed below (paragraph 6.13.2), many more respondents are critical of the practice of averaging noise values in the context of the LOAEL.

Comments on WebTAG

- 6.11.11. The consultation document proposes observable noise, health and quality of life impacts are assessed and quantified using webTAG, a Department for Transport guidance for transport modelling and appraisal. It states that the webTAG noise tool allows decisions on transport schemes to take account of the costs and benefits of different options with regard to noise.
- 6.11.12. Some respondents express support for the proposal to use webTAG, generally underlining the need to consider and assess the health, wellbeing and quality of life impacts of aircraft noise and for clear guidance in this respect. A few respondents challenge the ability of webTAG to properly assess impacts on health.

- 6.11.13. Some respondents - including some who are supportive of its use in principle - raise specific questions or concerns in relation to the use of webTAG. A number of respondents, particularly local authorities, community groups and individuals, request further information to be provided in relation to webTAG and its proposed application. They argue that insufficient information has been made available regarding webTAG and how it will be applied in an aviation scenario, inhibiting the ability of respondents to comment meaningfully on the proposal. A few respondents suggest the need for an interim methodology while the application of webTAG to aviation is further developed and consulted on.
- 6.11.14. A few respondents highlight the need for flexibility in the appraisal methodology in order for it to incorporate non-monetisable impacts. They note that such impacts often result from unique local circumstances and could be a key factor in the appraisal of options through the options analysis process.
- 6.11.15. For the same reasons, a small number of community groups request an independent review of webTAG methodology in order to demonstrate its suitability in an aviation context.

“We support the proposed use of WebTAG in assessing adverse noise effects. Given the likely importance of WebTAG in future appraisals we request that the Department provides funding for an independent review of the adequacy and appropriateness of the WebTAG methodology, to be carried out by consultants on behalf of communities.”

Community group, User ID 119762

- 6.11.16. Other respondents, particularly airlines, airports, air navigation providers, local authorities and businesses, go further to express concern that webTAG in its current form, having been developed for non-aviation transport schemes, might not be suitable or fully effective for use in aviation. A key aspect of this concern is its perceived inability to properly quantify the effects of respite. In some cases these respondents suggest that webTAG should be developed further in order to make it fit for purpose.

Assessing the impact on health and quality of life

- 6.11.17. Many respondents express general support for the consideration of these impacts within the assessment of noise.
- 6.11.18. In responses to all of the consultation questions - often without reference to the proposals in this area - a large number of respondents, underline the negative impact that noise has on health and quality of life. This issue is raised mainly by individuals, but also by community groups and local authorities.

“With the number of noise events increasing for everyone, even where dispersal is the current strategy, noise is now as much a health as a lifestyle issue because of the stress it causes.”

Local authority, User ID 131283

6.11.19. In relation to the commitment in the consultation document to assess the health impacts of aviation noise, a number of community groups and local authorities (as part of a co-ordinated response) are supportive of such an approach but feel that not enough is proposed in this regard. They do not believe sufficient effort has gone into understanding and addressing noise impacts, and emphasise the need for further detail on how health and quality of life considerations will be integrated into the assessment of noise and the appraisal of airspace change decisions.

6.11.20. In order to address this, a few respondents suggest that WHO guidelines should be implemented or followed. These guidelines are mostly referred to generically. However, one local authority highlights specific guidance and suggests a health and social impact study be carried out in line with this to support noise assessment.

“It is recommended that when assessing potential impacts, that such metrics are supported by a robust health and social impact study in accordance with WHO methodology (WHO 2012: Methodological guidance for estimating the burden of disease from environmental noise).”

Local authority, User ID 131390

6.11.21. Respondents also highlight a number of considerations relating to health that they feel should be taken into account:

- the effects on psychological wellbeing, cardiovascular diseases other than acute myocardial infarction and diabetes;
- long-term health impacts from airspace changes;
- the costs to the NHS and the economy of health impacts, especially due to possible impacts on education and work productivity;
- the effects of noise on children, specifically the impacts on cognition and learning arising from lack of sleep;
- health impacts by age category more generally;
- ensuring health impacts are measured by impartial third-parties; and
- other data and information, such as research carried out at MIT relating to the impacts of noise on life expectancy and quality of life.

6.12. Measures of aircraft noise levels: frequency of aircraft noise occurrences

- 6.12.1. In addition to the metric for LOAEL, the consultation document proposes the introduction of relative metrics based on the frequency of aircraft noise occurrences, known as N-above metrics. It suggests that N65 - indicating the number of noise events exceeding 65dBA over a given period - be used to supplement the LAeq 16hr metric to better understand the impact on those potentially affected by an airspace change.
- 6.12.2. Those respondents who comment on the proposal to assess the frequency of noise events (in addition to existing metric) are overwhelmingly supportive, though some respondents make additional suggestions with respect to this proposal. A very small number of respondents oppose the proposals for the assessment of noise, without commenting further.
- 6.12.3. Clear support is voiced for the proposal to include the frequency of noise events in noise assessment in general, as well as for the use of N60/N65 (number of events above 60 and 65dB, respectively) noise metrics more specifically.
- 6.12.4. A small number of respondents request that in addition to the N60 metric suggested, contours for N55 and N65 also be included on noise contour maps to give a more detailed picture of the variation in noise levels.

Overflight

- 6.12.5. In addition to the N-above metrics, the consultation document also proposes adoption of a definition of 'overflight' put forward by the CAA in their document CAP 1498. This document defines 'overflight' as an aircraft passing an individual below 7,000 ft. and at an elevation angle (approximately representing the angle between the horizon and the aircraft) above a threshold to be agreed. It proposes a corresponding metric based on the number of 'overflights' experienced within a given time period.
- 6.12.6. The concept of overflight focuses on an individual's perception of being overflown, and is intended to contribute to comparison of different airspace options by better reflecting the number of times an individual will feel like they have been overflown.
- 6.12.7. Relatively few respondents comment on this proposal. Of these, a few are supportive, some of whom caveat their support depending on the choice of angle of elevation chosen for the threshold value. The two possible angles suggested by the CAA - 60 degrees or 48.5 degrees – are supported by different respondents.
- 6.12.8. A few other respondents are critical of the proposal, generally without commenting further a small number of local authorities and an individual are particularly critical of the choice to restrain the overflight definition to aircraft flying at 7,000 ft. or below.

6.13. Further criticisms of the proposed metrics for noise assessment

Criticisms of the use of averaging

- 6.13.1. Respondents are also critical of the practice of using noise values which are averaged over a number of hours – a feature of both the existing metric for significant community annoyance and those proposed as part of a risk-based approach (particularly the LOAEL).
- 6.13.2. Averaging is most often discussed with specific reference to the LOAEL proposal. Many respondents - particularly community groups, environment groups, local authorities and individuals - feel that whether averaged over 16 hours (LAeq) or 8 hours (Lnight), this set of metrics does not accurately reflect either the frequency of noise events, or their full significance in terms of health and quality of life impacts.

“...by averaging noise over an extended period, with no account of operational mode changes, it does not highlight the impact of periods of frequent noise events.”

Community group, User ID 127451

- 6.13.3. Some of those who believe the LAeq metrics to be inadequate on this basis are supportive of the proposed supplementary metrics measuring the frequency of noise events, seeing these as a means of refining these metrics. By contrast, some respondents note that, even if supplemented by other metrics, the new principle metrics for LOAEL - 51dB LAeq and 45dB Lnight - are still averages, and therefore still suffer from the same inherent problems as the previous metrics.
- 6.13.4. Some of those who comment on averaging raise the related issue of how respite periods are reflected in noise assessments. They argue that by averaging over a certain time period, the LAeq metrics do not account for the effects of respite. A few respondents - including by a small number of airports and air navigation providers - argue that a better quantification of respite is needed in the assessment of noise.
- 6.13.5. A few respondents question the use of the supplementary N60 and N65 metrics on a similar basis, commenting that if the proposed metrics cover a long enough time period, including times of respite, that they will have the same shortcomings as the LAeq metrics in this respect.
- 6.13.6. Many other respondents make a specific request that separate contours should be provided for periods with and without respite – for example easterly and westerly operations - rather than averaging across the two. This is so that the average noise values for an area do not include times of respite due to runway alternation, which would lower the average.

“The contours are misleading in that they measure the noise averaged between easterly and westerly operations”

Local authority, User ID 119762

Ambient noise (differences between urban and rural areas)

- 6.13.7. Some respondents are critical of the proposed noise metrics on the basis that they fail to take account of the fact that noise will affect certain areas in different ways depending on the character of the area. In particular, some respondents comment on the fact that the relationship between noise amplitude and annoyance could be very different between rural and urban areas, owing to different levels of ambient (or background) noise.
- 6.13.8. Ambient noise is discussed in relation to both the concept of significant community annoyance and the proposed new LOAEL metric. Some respondents argue that rural areas typically have lower background noise than urban ones. As such the amplitude at which aircraft noise begins to have a significant negative impact (however defined) will be lower in rural areas than in urban areas.
- 6.13.9. On this basis, many community groups, environment groups, local authorities and individuals request that ambient noise be included in the noise assessments. More specifically in relation to the proposed LOAEL metric, they often argue that using only an averaged value to measure the noise due to an airspace change takes no account of the net increase in noise in the area where the change has taken place.

“It is not so much the absolute aircraft noise impact that matters, but its relative impact, compared to the ambient noise level. Thus, if you live and work next to a busy road or an otherwise noisy environment you will, in all likelihood, be less disturbed by aircraft noise than if you live and work in a tranquil rural and otherwise peaceful environment. Clearly this is an extremely important issue in the case of airports located in a rural setting, and it must be given due consideration.”

Community group, User ID 137697

- 6.13.10. A few respondents criticise the 2014 Survey of Noise Attitudes (SoNA) – part of the research underlying the new proposals - on the grounds that the data collected in this survey did not take account of ambient noise. In some cases these respondents go further to suggest that additional work is required in terms of collecting ambient noise data and considering how this can be integrated into assessments.

“We understand that the reason the SoNA survey did not include ambient noise was the difficulty of obtaining appropriate figures for the levels of ambient noise at the locations where the interviews took place. That does not appear an insuperable problem, and we hope that further work can be done on this issue.”

Community group, User ID 5102

Other

- 6.13.11. A few respondents criticise the proposed metrics in a more general sense for not capturing the true ‘annoyance’, ‘disturbance’ or ‘distress’ experienced by communities as a result of aircraft noise.
- 6.13.12. As with options analysis, a few respondents express concern about the weighting of community concerns in relation to the commercial interests of aviation industry stakeholders. When commenting on why they believe the proposed metrics to be inadequate, a few community groups and local authorities state their belief that these are biased towards the aviation industry, or towards enabling growth and expansion rather than health-based noise reduction. These comments are often made in relation to averaging and the lack of consideration for ambient noise.
- 6.13.13. A few respondents criticise a perceived over-reliance on noise modelling, and call for more experimental or ‘actual’ measurements of noise to be made, particularly in areas away from the immediate vicinity of airports. A smaller number of respondents comment critically and in more detail on current modelling of noise at Heathrow, concluding that these practices underestimate the true level and therefore impact of noise there.

6.14. Other comments and suggestions relating to the assessment of noise impacts

- 6.14.1. Aside from the suitability of the proposed metrics, there are a number of other higher level comments and suggestions raised in responses with regard to proposals for assessment, mostly in relation to how these will be developed and used in the future.
- 6.14.2. A few respondents, particularly airports and local authorities, express concern about the complexity of different approaches to noise assessment and underline the need for noise metrics and assessments to be presented in ways that are easy to understand for the layman.

“We are concerned that noise assessment as a subject is already complex and difficult for the layman to understand. It is unlikely that communities will understand how noise has been assessed unless you take the time to come up with clear and easily explainable assessments of noise measurement and impact. Unless this is done communities may continue to view noise monitoring metrics with suspicion and see them as an attempt by airports to ‘blind them with science’.”

Local authority, User ID 131344

- 6.14.3. Many respondents who comment in detail on the proposed metrics also make a number of more specific suggestions regarding additional or replacement noise metrics. In particular, a few suggest consideration of peak noise (also known as Lmax) as an indicator of the maximum volume of noise events. A few of these respondents also suggest that this indicator should take account of the volume within a particular time interval either side of this peak noise level. Similarly, others note the need to consider the duration of loud events (in addition to how often these events take place). A small number of respondents suggest utilising noise metrics based on the sound exposure level or the single event level. Others suggest that any measurement of noise should account for the frequency (pitch) of the noise.
- 6.14.4. Some respondents also put forward suggestions in relation to how the metrics and approach set out in Chapter 5 of the consultation document should be further developed and applied. Among these, a small number of respondents underline a perceived need for additional data and improved assessment of noise without elaborating further. Some, as part of a co-ordinated response, suggest regular review and updating of noise assessment data. Others ask more specifically that further details be given on the definitions of the proposed new metrics, and examples provided. A few respondents suggest that the new metrics should be consulted on more before being implemented.
- 6.14.5. Some community groups and local authorities suggest that ICCAN should play a role in further refining the metrics, tailoring these to the specific circumstances of different areas, carrying out research and establishing best practice.

“...and believes the role of ICCAN to be critical in advising on how these should be tailored/customised to individual circumstances. Its research and best/better practice role will also be fundamental to moving forward.”

Local authority, User ID 131387

- 6.14.6. As with the options analysis proposals, a few respondents request that the proposals for the assessment of noise be applied to current proposals to expand air capacity in the South East of England or even retrospectively to previous decisions.
- 6.14.7. A few respondents also highlight other factors to be considered in the assessment of noise. In particular, a few suggest the need to take account of the cumulative impact

of noise from other sources such as road and rail, while some others argue that air quality indicators should be included in assessments.

Chapter 7: Independent Commission on Civil Aviation Noise

7.1. Introduction

- 7.1.1. Questions 3a and 3b relate to proposals set out in Chapter 6 of the consultation document: Independent Commission on Civil Aviation Noise (ICCAN). In particular these questions ask for respondents' views on a set of functions proposed for the Commission and on aspects of the new body's structure, governance and funding.

Independent Commission on Aviation Noise – functions (Q.3a)

7.2. Question 3a: Overview

- 7.2.1. Question 3a asks:

Please provide your views on the Independent Commission on Civil Aviation Noise (ICCAN's) proposed functions.

Respondents are asked to consider a range of functions proposed for ICCAN including:

- advising on airspace change and noise management;
- providing guidance on planning approach;
- publishing and promoting best practice;
- reviewing, undertaking or commissioning research;
- and monitoring and reporting noise measurements.

- 7.2.2. Question 3a received 299 responses. In addition, 224 respondents commented on ICCAN's proposed functions in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 3a and are included in the analysis below.

7.3. Overall support and opposition to ICCAN

Overall support

- 7.3.1. A number of respondents express overall support or opposition to the proposal to create ICCAN. Of these, the majority - including organisations from various categories - support the creation of the Commission.

- 7.3.2. Many respondents simply state their agreement with the proposals without further comment. Those who do elaborate express support for ICCAN’s potential to provide an independent voice on aviation noise, expertise on noise management, and the ability to foster engagement between communities and the aviation industry.

“We welcome the creation of Independent Commission on Civil Aviation Noise (ICCAN) and recognise the role such an advisory body could play in improving communication and trust with communities.”

Airport, User ID 137699

- 7.3.3. Among those who are supportive, local authorities, community and environment groups and individuals in particular welcome the prospect of ICCAN providing a channel through which local community concerns and priorities will be heard and represented.

Caveats to overall support

- 7.3.4. Many of those who express support for ICCAN do so with a caveat - a concern or condition qualifying their support. The various concerns and criticisms in relation to the ICCAN proposals are explored in greater detail in the remaining sections of this chapter but a few key caveats are noted here.

- 7.3.5. **Independence:** Many respondents highlight the importance of the Commission’s independence. Respondents generally want to see an organisation with broad, well-balanced expertise, impartial in its thinking and transparent in its functioning. Some of those respondents who express support for the proposals question whether this independence will be possible with ICCAN sited within the CAA.

“We support the creation of an ICCAN providing that its Head Commissioner and key people are truly independent with no connection with the aviation industry”

Community group, User ID 113578

- 7.3.6. **Lack of powers:** Many respondents - notably local authorities, community groups, some statutory bodies and individuals - question the power ICCAN will have to effect real change. These respondents often suggest that ICCAN should have additional powers, in particular the ability to set and enforce noise limits and to compensate those affected. Many propose potential additional functions for ICCAN, both statutory enforcement powers and enhanced roles in research, monitoring, mediation and advising government.

- 7.3.7. **Need for clearer definition of role:** A few respondents who agree that ICCAN’s role should be advisory rather than regulatory – including a few airports and an airline – believe that further definition of ICCAN’s remit is needed to ensure this.

Overall opposition

7.3.8. Of those respondents who express an overall opinion on ICCAN, a minority expresses opposition. This opposition falls into two categories:

- Opposition, in principal, to the creation of ICCAN; and
- Opposition to ICCAN as it is being proposed.

Opposition in principle

7.3.9. Some community/environment groups and individuals are broadly critical of the way in which aviation noise is currently regulated and believe the principal issue to be a lack of effective regulation and resolve on the part of the Government. They feel that the creation of ICCAN side-steps the issue of regulation in favour of focusing on rebuilding trust.

“It is absolutely clear that the present regulatory arrangements for reducing aircraft noise, overseen by the government, are inadequate. The proposals in the consultation do not address this situation.”

Community group, User ID 122109

7.3.10. Many respondents, mainly individuals, express a lack of trust in the Government and, as a consequence, its plans for ICCAN. These respondents highlight a number of causes of their mistrust: their perception that the Government has not kept its promises on airport expansion; their sense that the CAA is influenced by the aviation industry; and their view that airport operators are underhand and ineffective in their handling of concerns about aviation noise. In this context, respondents highlight a number of specific cases where they feel they have been let down (in particular Heathrow, Gatwick, and Luton).

“Trust is built when airport operators behave truthfully and honestly; when they repeatedly respond to well documented noise complaints with evasions and misleading “bait and switch” type answers, the role of the ICCAN is hopelessly compromised.”

Individual, User ID 5110

7.3.11. A few respondents – including a few airports and air freight businesses – express the view that the creation of ICCAN is unnecessary and/or unwelcome. Some of these highlight concerns about the additional bureaucracy and delay that ICCAN could bring. A small number of respondents express the view that ICCAN would be a waste of money.

7.3.12. A few airports express the view that ICCAN is being created to address a problem that is not universal. They dispute the issue of a lack of public trust in the sector, which they believe is the basis for proposing to establish ICCAN. They highlight the strength of their consultative arrangements with local communities, in one case arguing that

where relationships are fractured, it should be the responsibility of the airport, not ICCAN, to take action.

“X does not see the merit in the establishment of an ICCAN as it is assumed that all Airports have a lack trust between them and their local communities which is not always the case.”

Airport, User ID 131370

Opposition to ICCAN as proposed

- 7.3.13. Many respondents do not oppose ICCAN per se, but identify reasons why they think ICCAN, as proposed, will not be an effective response to the issue of aviation noise. The key issues they raise are independence and enforcement ability.
- 7.3.14. Some respondents raise concerns about ICCAN’s independence, especially if it is sited within the CAA. Some express the view that the CAA is influenced by the aviation industry and that ICCAN’s credibility and effectiveness will be impeded by this association.

“we do not believe that ICCAN as currently proposed will be in any way fit for this purpose. Housing such a body within the CAA, an already seriously conflicted and industry-centric organisation ... will simply ‘not fly!’”

Community group, User ID 136024

- 7.3.15. More respondents who oppose the creation of ICCAN do so because of their concern about the body’s perceived lack of regulatory and enforcement power. These respondents include a few local authorities, environment groups and statutory bodies. Some of these respondents refer to the Airports Commission’s recommendations for an aviation regulator and express disappointment that these have been “watered down”. They feel that, as envisaged, the commission would lack the statutory role and tools to compel action on aviation noise.
- 7.3.16. Many respondents believe that ICCAN should be given a stronger regulator and ombudsman role. Some respondents want to see a commission with the powers to establish noise reduction targets, handle complaints, sanction offending operators and decide compensation.

“The ICCAN proposals need to be completely re-thought and should be aligned with the recommendations of the Airports Commission”

Local authority, User ID 131394

7.4. ICCAN's attributes

- 7.4.1. Many respondents specify the high-level attributes they expect ICCAN to have. In particular they underline the importance of ICCAN being a credible, authoritative organisation – a body that will be taken seriously on account of both its significant role and its reputation for independence, accountability, and transparency.
- 7.4.2. Many respondents also view independence as a critical attribute. Some mention the breakdown of trust between communities, aviation operators and other stakeholders over the issue of noise, and stress that ICCAN will need to demonstrate independence from the aviation industry in order to overcome this mistrust and develop a credible voice for those affected by noise.
- 7.4.3. Many of those who emphasise the importance of independence comment that ICCAN's authority and independence should be backed by enforcement powers. These comments mainly come from local authorities, community groups, environment groups and individuals. They believe it should be a commission 'with teeth' and highlight a wide range of potential powers they feel are necessary for ICCAN, including regulating and enforcing noise limits and deciding compensation for affected communities.

“Any fully effective independent commission must be truly independent and have the legislative teeth to prove that it a strong advocate and protector of communities on the critical issue of noise.”

Individual, User ID 131344

- 7.4.4. For many respondents, ICCAN's role is to be an independent representative, or even champion, of local communities. Some of these respondents emphasise the importance of ICCAN listening to local communities and using a range of consultation techniques to canvass broad opinion.
- 7.4.5. In contrast to those who see ICCAN as a representative of community interests, some respondents – including a number of airports, an airline, an air navigation provider and a business umbrella body – emphasise that ICCAN should be independent from both commercial and community interests. These respondents envision ICCAN's role as that of a neutral arbiter, able to weigh up the merits of the competing arguments of airspace change sponsors and those who voice community concerns.

7.5. ICCAN's proposed functions: airspace change

- 7.5.1. Of those respondents who comment on ICCAN's proposed role in airspace change, the majority express disappointment that that role is only advisory. A co-ordinated response from a number of parish councils and community groups warns that if ICCAN lacks regulatory powers to ensure its advice is followed, the body will not be respected and trusted. These respondents want the commission to have regulatory

and ombudsman powers: the authority to adjudicate on flight paths and decide compensation.

“The Government's astounding decision to ignore the AC's constructive recommendation and strip it of any powers to make it just an advisory body ... is likely to create yet another confusing time wasting talking shop which will please nobody.”

Individual, User ID 131343

- 7.5.2. To mitigate the risk of ICCAN's advice being ignored, a few organisations – including an airport and a local authority – stress the importance of airspace change sponsors being obliged to give due regard to ICCAN's advice and to explain their decision if they opt to deviate from it. One respondent suggests that, before giving advice, ICCAN should engage all communities potentially impacted by the airspace change so that all affected communities are represented.
- 7.5.3. In contrast, a smaller number of respondents, including an air navigation provider, an airline and an airport - express concern that the advisory function proposed for ICCAN is too extensive. These respondents worry that ICCAN would add a layer of bureaucracy, causing delay and cost and hindering airspace modernisation. In general, they wish ICCAN's role to be purely advisory and clearly defined. In a couple of instances, respondents suggest that ICCAN should only be consulted on the largest airspace proposals to reduce bottlenecks and to avoid a blanket, one-size-fits-all approach.

“the establishment of ICCAN will create an additional layer of bureaucracy and further delay if the development and leadership of the new body is not carefully considered. As such, it is vital that the new body's role remains strictly advisory rather than authoritative and should not stop the overall process of airspace change by introducing unnecessary red tape.”

Airport, User ID 131368

- 7.5.4. A few respondents – including an airline, an airport and another organisation – express the view that ICCAN should be the facilitator of airspace change rather than a barrier to modernisation. They stress the complexity of airspace decisions and state that noise considerations need to be balanced against other factors, such as capacity, efficiency, safety and the environment, as well as the wider economic and social benefits of aviation. These respondents want to see ICCAN represent all relevant parties and take account of the many competing agendas and priorities in aviation. In this sense they express concern that ICCAN should not generate unrealistic public expectations about what can be achieved on aviation noise.

“Establishment of ICCAN is not a quick fix for the difficult decisions that must be made to achieve airspace modernisation and the policy should be careful not to raise community expectations unrealistically.”

Airline, User ID 131388

7.6. ICCAN’S proposed functions: planning and ongoing noise management

7.6.1. Some respondents, notably some airports, local authorities and an air navigation provider, welcome ICCAN’s proposed advisory role in noise management. They believe that ICCAN should become an authority on noise management best practice, able to build a national picture of current practice and help to improve consistency of approach and performance across the industry.

“At present, all noise management obligations are set and monitored by the local planning authority, and there is a noticeable difference in noise restrictions set as part of planning throughout the UK airports. Therefore, we believe an ICCAN would have the ability to provide a much broader view and outlook on noise management.”

Airport, User ID 4376

7.6.2. A few respondents express concern about the potential for ICCAN recommendations to conflict with existing international (ICAO) noise design standards applied to aircraft and engine design. They suggest that ICCAN’s advice be assessed by the CAA to avoid any such clash. Another respondent requests that ICCAN’s monitoring requirements be proportionate to the problem being addressed.

7.6.3. However, a greater number of respondents – including a few local authorities and community groups – express the view that the advisory role proposed is not extensive enough. These respondents believe that ICCAN, working in consultation with local communities, should have greater powers, such as being able to compel airports to amend their guidelines and noise action plans, or to define noise targets and envelopes. Some of these respondents propose that ICCAN be able to restrict airport operations where it deems noise management to be ineffective.

“ICCAN should be given the powers and remit to define target noise outcomes for an airport in consultation with local communities. ICCAN should also be given the powers and remit to mandate and if necessary enforce those outcomes.”

Community group, User ID 4957

7.6.4. One respondent on behalf of an airport proposes that ICCAN be made a statutory consultee on draft noise action plans, giving it the authority to formally challenge

airports' plans. Another respondent suggests that if ICCAN's role is to be purely consultative, there should at least be a presumption that ICCAN's advice will be followed and that deviation should occur only in exceptional circumstances and be subject to CAA approval.

Input to planning enquiries

- 7.6.5. A few respondents comment specifically on the proposal for ICCAN to input into planning applications and planning inquiries. Opinions differ on the extent of ICCAN's role here. One local authority asks that ICCAN advises on all planning applications regardless of the size of the application in terms of passenger numbers, scale of infrastructure or air traffic movements. In contrast, one airport expresses concern at the absence of a threshold to determine when ICCAN would intervene in local planning decisions. They are concerned that if ICCAN is involved in every decision this would slow down local decision making and potentially jeopardise currently positive airport-community relationships.

7.7. ICCAN's proposed functions: publish and promote best practice

- 7.7.1. A small number of respondents – including an airport and an air navigation provider – welcome the function to promote best practice and consider that ICCAN would add value by providing an independent view of national and international guidance on aviation noise. A few regional airports warn that, when applying best practice, a distinction should be drawn between larger and smaller airports (less than 50,000 ATMs). They express concern at the blanket application of standardised best practice leading to disproportionate cost or complexity for smaller regional airports.
- 7.7.2. However, the majority of respondents who comment on ICCAN's best practice role express scepticism about the overall value of best practice and its impact on an industry driven by commercial objectives. A co-ordinated group of responses note that this function could be performed equally well by the CAA, and some of these state that best practice information is of no value to the public.

“Promoting best practice is a qualitative term and full of good intentions but the track record of the aviation sector is that their commercial objectives will take precedence. Without quantitative targets little will change”

Individual, User ID 127457

- 7.7.3. Some respondents make specific suggestions for the proposed role of ICCAN with regard to developing future best practice. One respondent suggests ICCAN provides best practice on how to implement airspace modernisation and develop visual ways to express and communicate noise changes. Another respondent asks that ICCAN develops best practice in compensation and the economic assessment of noise

impacts. A local authority respondent proposes a comparative review of noise management at Heathrow and Schiphol. A few respondents suggest that ICCAN have a role in providing guidance and advice on the impact of aircraft noise on health.

7.8. ICCAN’s proposed functions: review, undertake or commission research

- 7.8.1. There is clear support for ICCAN having a research function. Respondents from all sectors welcome the proposal and the majority of them make particular mention of the need for additional funding to be made available for this purpose (not merely a reallocation of part of CAA’s research budget). One respondent suggests that research should be funded by a levy on the industry.

“We are also particularly supportive of the inclusion of a research capability and request that adequate funding is made available to make this function effective.”

Airport, User ID 4882

- 7.8.2. As with best practice, there are a number of specific suggestions for future areas of research. These include: methods for reducing and distributing noise; methods for measuring and reporting noise; the health and environmental impacts of noise; the impact of aircraft above 7,000 feet; and trends in air traffic flows.
- 7.8.3. A small number of respondents highlight parties who could have a role in ICCAN’s research activity, including community representatives and industry representatives to advise on evolving technology/operational developments in noise reduction and the interdependencies of aspects of aircraft and engine design. Another respondent notes the potential for duplicating or conflicting research activity and urges ICCAN to coordinate with industry, CAA and the Government on its plans.

7.9. ICCAN’s proposed functions: monitoring and assuring noise measurement and how noise is reported

- 7.9.1. A small number of respondents specifically welcome the proposal that ICCAN will monitor and assure noise measurement and reporting. A couple of these respondents highlight that having a single authoritative source of noise monitoring information will help to build trust with the communities affected by aircraft noise.

“An Independent Commission on Civil Aviation Noise (ICCAN) could play a helpful role objectively validating noise impact data and methodologies, to ensure all parties (Government, regulator, promoter and local communities) can trust that the data on which important, timely decisions are to be made, are accurate and reliable.”

Other organisation, User ID131303

- 7.9.2. A few respondents propose that ICCAN’s noise measurement role could be wider. They express disappointment that the monitoring function is narrower than that recommended by the Airports Commission, which envisaged a body with a formal role in monitoring and quality assuring all processes and functions which have an impact on aircraft noise.
- 7.9.3. One respondent suggests that ICCAN could also provide opinion on the interpretation of different data sets that might be used by different parties. Alternatively, ICCAN could provide the technical framework for assessment of all these issues, including evaluation of financial benefits and costs of alternative options in line with HM Treasury guidelines.
- 7.9.4. However, as with best practice, the majority of respondents discussing this function, link ICCAN’s proposed monitoring function with the organisation’s lack of enforcement powers. They question the value of ICCAN tracking noise levels if that work is not backed by the authority to set and enforce noise limits or impose sanctions where existing noise limits are breached.

“...ICCAN has no proposed powers to take action when ‘best practice’ is not followed or when existing rules on respite are breached. It cannot serve a warning notice on poor airport or aircraft operator performance or levy fines”

Individual, User ID 131358

- 7.9.5. Many respondents propose sanctions, the most popular of which is fines. Respondents express a range of views on whether these should be imposed on the airport or the airline. Other ideas include: naming and shaming offenders, the power to force changes to operating guidelines, and the temporary or permanent revocation of operating licences. One airport supports the idea of fines levied on airlines where noise levels are higher than planned over a period of time.
- 7.9.6. Within their responses to question 3a, a number of respondents criticise current measures used to assess the impact of aviation noise. These comments are reported on in Chapter 6 of this report.

7.10. Additional functions proposed by respondents

- 7.10.1. As mentioned already, many respondents suggest additional functions for ICCAN. These fall into a number of categories:

- regulator/enforcer on noise management;
- ombudsman, mediator and post-implementation reviewer;
- statutory consultee;
- government adviser;
- noise reduction; and

- other.

Regulator/enforcer on noise management

- 7.10.2. A large number of respondents express the desire to see ICCAN take on the role of noise regulator, setting and enforcing noise limits. A few respondents express the opinion that giving ICCAN greater powers would at last redress legislation establishing that nuisance from aircraft noise is exempt from legal challenge.
- 7.10.3. Amongst the respondents calling for this regulatory function are many local authorities and community and environment groups, as well as individuals. The powers they propose are wide ranging and stretch from escalating airspace proposals to the Secretary of State, to imposing fines, restricting operations, taking legal action and withdrawing licences. A couple of respondents note that ICCAN's directions should only be able to be overruled by the CAA where it can justify overriding safety or efficiency concerns.

“What is required is firm regulation of aviation noise by a body that has the duties and powers to mandate and if necessary enforce sustained reductions.”

Community group, User ID 124818

Ombudsman, mediator and post-implementation review

- 7.10.4. A large number of respondents express disappointment that, as proposed, ICCAN will not have the role of ombudsman for aviation noise complaints and concerns.

“we strongly believe that ICCAN should have an ombudsman-type role that would ultimately be responsible for dealing with complaints and concerns from the local communities impacted which have not been resolved locally.”

Local authority, User ID 137684

- 7.10.5. Some respondents express frustration at the current complex complaints handling system managed by airports in which complainants are passed 'from pillar to post' between airlines and aviation authorities. Many want to see ICCAN become a single point of contact for all complaints with the powers to decide compensation and order improvement.

“Many people who have complained about aircraft noise have found unsatisfactory the system whereby their complaints are dealt with by the airport, and then the buck is passed between the Department, CAA, NATs and the offending airline. A single point for complaints, an aircraft noise ombudsman with power to order improvement or compensation, is needed.”

Environment group, User ID 110023

- 7.10.6. Other organisations, across a range of categories, propose that ICCAN’s role be at higher level. They suggest that ICCAN handle complaints once it is clear that they cannot be resolved at a local level, and/or act as mediator of disputes between the airport and the community where requested to do so.
- 7.10.7. However, a few respondents – including an airport, an airline, a business umbrella body and another aviation organisation - express the view that ICCAN should not act as an ombudsman or “appeals body” (even though this is not proposed in the consultation document). One of these respondents suggests that such a role would compromise ICCAN’s neutrality.
- 7.10.8. A small number of respondents express the desire to see ICCAN review decisions already taken, citing a number of reasons for this. One respondent suggests that ICCAN should have a role verifying whether the impacts projected by the change sponsor have turned out to be accurate. A couple of respondents want ICCAN to be able to review the manner in which changes have been made at specific airports. They suggest looking at potential conflicts of interest in the planning authority’s decision making (Luton), or reviewing the extent and quality engagement with local communities (East London around City). Other respondents propose that ICCAN could investigate unresolved local issues, examine how they may be handled better and make recommendations to bring about resolutions.

Statutory consultee

- 7.10.9. A few respondents comment on the advisory function proposed for ICCAN, suggesting that the body would be more credible if this function went further and ICCAN was made a statutory consultee for proposals relating to airspace change and noise management. One respondent suggests that ICCAN be given a more substantive role in the noise action planning process, becoming a statutory consultee on noise action plans.
- 7.10.10. A small number of respondents note that, contrary to the Airports Commission’s recommendations, local authorities will have the choice as to whether or not they seek ICCAN’s advice on planning applications. They argue that ICCAN should have more powers to hold airports to account and that its advice on airspace change proposals should be binding, otherwise its credibility will be undermined.

Government advisor

- 7.10.11. A small group of respondents, including some local authorities, want to see ICCAN given a specific role to advise Government on whether its policies are ‘fit for purpose’. They see the new body as having a role to advise up to Government as well as out to the industry and communities. One local authority respondent also mentions ICCAN having the ability to report periodically to Government on the performance of all competent authorities.

“If the ICCAN is unable to advise Government on what noise policies and decisions are necessary in order to tackle aviation noise it is hard to see how it can have much standing or respect in the eyes of the public.”

Local authority, User ID 131283

Noise reduction

7.10.12. A small number of respondents reject what they perceive to be the consultation’s assumption that increasing aviation noise is inevitable. These respondents express the desire to see ICCAN given an explicit role in noise reduction, or at least a role to ensure no overall increase in aviation noise.

Other roles

7.10.13. Referring to the fact that noise is considered a priority up to 7,000ft under the Altitude Based Priorities (See Chapter 6 of this report), a couple of respondents wish to see ICCAN’s remit extend up to and beyond this level. One of these requests that ICCAN conduct an independent review of the 7,000ft threshold. Another respondent wishes to see the Commission examine the impacts of aviation pollution as well as noise.

7.10.14. One respondent asks that ICCAN help establish guidance on engagement, advising how industry and communities should interact

7.10.15. Another respondent hopes that ICCAN will lead in revising planning guidance in relation to noise in PPG24 (Planning and Noise). The same respondent suggests that there might be a case for ICCAN’s role expanding over time to include safeguarding in the context of public safety zones.

Structure, governance and funding of ICCAN (Q.3b)

7.11. Question 3b: Overview

7.11.1. Question 3b asks:

Please provide your views on the analysis and options for the structure and governance of ICCAN 6, and the lead option that the Government has set out to ensure ICCAN's credibility.

7.11.2. The lead option includes the following details:

- In terms of **structure**, it is proposed that ICCAN be an independent body within the Civil Aviation Authority (CAA);
- In terms of **governance and funding** it is proposed that ICCAN will be:
 - i. accountable against terms of reference, set by the Secretary of State;
 - ii. subject to a sunset review after five years; and
 - iii. funded via public funds.

7.11.3. Question 3b received 272 responses. In addition, 238 respondents commented on ICCAN's structure governance and funding in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 3b and are included in the analysis below.

7.12. Overall support for and opposition to the proposals

Overall support

7.12.1. Of those respondents who express overall support or opposition to the proposals, the majority are supportive. In most cases these comments are simple statements of agreement. Of those who comment further, a few note that the proposals seem 'appropriate' or 'reasonable'. When expressing their overall support, some respondents also welcome the proposal that ICAAN will be publicly-funded, established quickly, and sited within the CAA.

"I agree with the proposal that ICAAN should be set up as an independent body within the CAA and should be funded from public funds to ensure impartiality from industry. Speed of set up also important along with some degree of regulatory power."

Individual, User ID 4286

7.12.2. Many respondents note reservations or caveats alongside their support for the proposals. These caveats echo themes discussed in the first part of this chapter (relating to question 3a) including: the view that ICCAN should have robust

enforcement powers; the importance of transparency and impartiality; and concern that ICCAN's proposed position within the CAA will compromise its independence and credibility.

“The establishment of an ICCAN ... is to be welcomed but the proposals don't go nearly far enough and won't satisfy communities ... The ICCAN should be fully independent and have no association with the CAA which is tainted by its funding basis and track record.”

Individual, User ID 4861

Overall opposition

- 7.12.3. Of those respondents who express overall support or opposition to the proposals, the minority object to the proposals for ICCAN's structure, governance and funding. A few of these respondents believe that the ICCAN proposals would not be cost-effective. A few others express a more generalised rejection of the proposals as not representing an appropriate solution.
- 7.12.4. However, most of those who explain their objections raise similar concerns about authority and credibility that are raised by the supportive respondents. Some of these respondents express the opinion that the CAA is too heavily influenced by the aviation industry and that ICCAN would struggle to be independent (or to be seen as independent), due to the perceived pro-aviation outlook of the CAA.
- 7.12.5. Others reject the 'light touch' character of the proposals, arguing that the Commission should have tougher regulatory powers. Many respondents oppose the proposals due to their concern about both the potential lack of independence of the Commission and its potential lack of power.

“The proposal is for ICCAN to be a 'commission' without enforcement powers or decision making capability. This is insufficient to have an impact ... This whole area is not satisfactory, as it is akin to having road lorry regulations regulated by the Road Hauliers Association.”

Community group, User ID 116244

7.13. ICCAN's structure

Reasons for supporting

- 7.13.1. Of those who specifically discuss the proposal to position ICCAN inside the CAA, a small number express an explicit support. A few of these responses mention that the Government's lead option has the advantage of being quicker to implement.
- 7.13.2. Some respondents support the proposal on pragmatic grounds. They express concern about the possible impact of the ICCAN-CAA relationship, but acknowledge that time and logistical constraints make the lead option the best option. Some respondents state that speed should be a priority and a few (including a local authority and an

airport) stress the importance of ICCAN coming into existence in time to participate in proposed significant airspace changes, such as Heathrow expansion and LAMP2.

“Whilst the County Council's preference would be for ICCAN to be an entirely separate entity from CAA with greater powers, under these circumstances the arrangements appear to be a reasonable way forward”

Local authority, User ID 131387

7.13.3. A number of supportive respondents make suggestions that might help to lessen CAA’s potential influence (perceived and actual) on ICCAN. These include:

- ICCAN’s commissioners being drawn from a wide range of fields, including public health and environment (e.g. DEFRA, Public Health England and environmental NGOs);
- ICCAN drawing in external expertise (e.g. from academia) to support its work;
- ICCAN not occupying the same office building as CAA;
- CAA having a very limited role in setting up the new body; and
- CAA’s ECRD (Environment and Consultancy Research Department) being split off to become a government-run independent noise calculator and adviser to CAA, ICCAN, NATs and communities.

Opposition and concerns

7.13.4. A large number of respondents challenge the proposal that ICCAN be sited within the CAA on the grounds that this would compromise the Commission’s independence. This point is raised by individuals and a range of different organisations.

7.13.5. Many of these respondents simply underline their belief that ICCAN must be independent and/or impartial. Others comment more specifically on the CAA and its suitability to host ICCAN. Of these, some feel that the CAA has demonstrated clear bias in favour of commercial aviation in its past decision making. A couple of respondents also note that a proportion of CAA’s funding comes from the airlines (directly and indirectly via NATs) and argue that this would affect ICCAN’s actual or perceived independence.

It is extraordinary that the Government ‘recognises that independence, credibility and accountability will be key’ and then makes the body a division of the CAA - the very body that has been so partisan and disinterested in the current noise problems!

Individual, User ID 113576

7.13.6. A few respondents criticise the CAA on other grounds unrelated to its independence: namely that they consider the organisation is under-resourced and has demonstrated that it has neither the staff nor the budget to tackle noise issues.

7.13.7. Some respondents raise concerns about the potential issues of partiality, such as the likelihood of staff from the two organisations influencing each other. They suggest that the attitudes and allegiances of ICCAN employees could be affected by the mind-set of CAA staff working in the wider organisation, or brought in to work for ICCAN. One respondent notes that the existence of career opportunities within the CAA could influence the attitudes of ICCAN staff.

“notwithstanding any inbuilt ‘firewalls’ and independent lines of control, it is a fact that where groups of people work alongside each other, they glean information and this adjusts and influences their thinking over time.”

Airport, User ID 4381

7.13.8. A few respondents note that it is proposed that ICCAN have a role in scrutinising the CAA’s policies, performance and budget allocation on noise monitoring and reduction. In their opinion, ICCAN’s ability to do this will be compromised if the Commission is housed inside the CAA.

7.13.9. Some respondents, including a number of airports and a navigation services provider, comment on the danger of ICCAN not being perceived as independent by the public. They express the view that ICCAN’s relationship with the CAA would undermine the Commission’s credibility and performance irrespective of the actual level of independence ICCAN achieves. One airport respondent notes that given the level of public mistrust towards the CAA, ICCAN’s position inside this organisation would result in the new body coming under intense scrutiny from industry and communities.

“It will be challenging for ICCAN to retain a reputation for independence once it starts to influence decision making. This challenge will be greater if ICCAN is seen as a part of the CAA.”

Air navigation service provider, User ID 124827

7.13.10. For the various reasons cited above, the majority of respondents who comment on this aspect of the proposals conclude that ICCAN should be an independent entity separate from the CAA.

7.13.11. A few respondents note the legal separation being proposed but judge that this will not be sufficient to overcome independence issues. A small number acknowledge that creating a separate body will take additional time and money but express the view that ICCAN’s credibility should take precedence over the need for a speedy set-up, even if that means it is not set up in time to contribute to discussions around Heathrow expansion.

“Independence is the key word, it may take longer to establish if the ICCAN is outside of the CAA but this may be the only credible approach.”

Individual, User ID 3892

- 7.13.12. As an alternative to the Government’s lead option, a few respondents express specific support for the first option set out in the consultation document (paragraph 6.7, page 55), which would see ICCAN established as a non-departmental public body sponsored by the Department for Transport.
- 7.13.13. Some respondents suggest other alternatives in terms of structure. A few respondents suggest that ICCAN follow the model proposed by the consultation but be hosted by another organisation entirely (either the Environment Agency or DEFRA). A few respondents propose that ICCAN adopt the regulator model of bodies such as Ofcom and Ofwat. One respondent suggests that ICCAN should be in community ownership.

7.14. ICCAN’s funding

Public/independent funding

- 7.14.1. Of those respondents who comment on ICCAN’s funding, the majority supports the proposal that the new body should be independently funded and not receive support from the aviation industry. In most cases, these respondents explicitly support funding by the Government, but a few respondents suggest that an air passenger levy could provide an independent source of funding for ICCAN. One respondent suggests that ICCAN should be funded from fines levied against operators by the new Commission.
- 7.14.2. Many of the respondents express the view that independent/public funding is important to ensure ICCAN’s impartiality and independence.

“In order to be deemed impartial, we believe that the ICCAN can only be funded via public funds”

Statutory body, User ID 5003

Industry funding

- 7.14.3. A minority of respondents express the view that the aviation industry (airports and airlines) should fund ICCAN either partly or fully. Some of these respondents express the view that aviation businesses should pay because they are the polluters and the ones profiting from use of the skies.
- 7.14.4. A few respondents suggest that ICCAN could be set up using public funds but that after this point ongoing funding could be provided by industry.

- 7.14.5. A few respondents raise concerns about the possibility of CAA being expected to fund ICCAN from its existing budget. They express concern that this could have an impact on the work on CAA's work.
- 7.14.6. A number of respondents emphasise the significance of ICCAN's role and state that, to be effective, the Commission must be adequately resourced, both in terms of funds and staff.

"ICCAN has an important job to do ... it must be independent, must be adequately resourced with funds and with people (people who actually understand the impacts of aircraft noise on communities)"

Community group, User ID 5145

7.15. ICCAN's governance

Terms of reference

- 7.15.1. A number of respondents comment on ICCAN's terms of reference - in terms of how these will be developed and agreed and what they will include. A few express their belief that the Secretary of State for Transport would not be sufficiently independent to set the terms of reference for ICCAN. One of these respondents suggests that the task be undertaken by the Cabinet Secretary instead.
- 7.15.2. Some respondents - including individuals and organisations from various categories - request that the terms of reference are subject to a public consultation. One respondent asks that the terms of reference are broadly framed to include communities that are not local to any airport but are still affected by aircraft noise.

"We urge the Government to separately consult on the ICCAN's terms of reference and the way it will operate before the body is established."

Airport, User ID 129541

Accountability and transparency

- 7.15.3. A few respondents stress the importance of ICCAN being accountable and transparent in its operations and decision making, although these express differing views on accountability. A few wish to see ICCAN be accountable to local communities but others mention parliament, government departments, the Secretary of State for Transport, and industry as bodies to whom ICCAN should be accountable.

The Head Commissioner

- 7.15.4. Some respondents express the view that the Head Commissioner will be a critical appointment. A few emphasise the importance of the appointee being visibly

independent, particularly from the aviation industry but also from community interests.

- 7.15.5. A few respondents remark on the need for the Head Commissioner to demonstrate strong leadership ability. One respondent suggests that the Head Commissioner should be a high profile figure whom the public would trust to be straightforward and impartial.

“the appointment of a Head Commissioner with a potentially non-noise background, and strong qualifications of leadership and communication will be crucial for the commission to succeed in its aims.”

Business umbrella body, User ID 131366

The Board

- 7.15.6. Some respondents express the view that ICCAN’s Board should represent a broad range of experience and expertise.
- 7.15.7. A few respondents – including airlines, a business umbrella body and a local authority – reject the suggestion that the Board does not need to include aviation experts and state that the Board should include senior industry representation to bring understanding of noise management and aircraft and airport operations.
- 7.15.8. Other respondents make a number of suggestions for other areas of expertise that the Board should encompass, including public health, environment and community engagement. Some respondents mention specific organisations, or types of organisation, from which ICCAN’s Board members should be drawn. These include DfT, DEFRA, Public Health England, a major environmental NGO and an economically-focused think tank.

“ICCAN board to be balanced, including individuals with experience of aviation, public health, community engagement, natural environment, as well as DfT official(s)”

Airport, User ID 131399

- 7.15.9. Many respondents express the view that community representatives should have a role in the governance of ICCAN. Some of these respondents suggest the inclusion of local councillors or MPs who are aware of the impact of aircraft noise and can voice the concerns of local communities. Others propose that people who have direct experience of living with aircraft noise, and/or represent community groups (such as HACAN) should be represented at the highest levels of ICCAN. One respondent suggests that ICCAN should be made up exclusively of people affected by the proposed changes.

“it would be essential that it should include an adequate number of community representatives to ensure that public interests are not swamped by the representatives of aviation related parties”

Individual, User ID 131343

Staff and advisory expertise

7.15.10. Some respondents talk more broadly about the expertise that they believe will be needed at lower levels within ICCAN. A few respondents make suggestions for contributors (in an advisor or employee capacity) to ICCAN’s work. These ideas include:

- industry experts able to advise on technology developments in noise reduction/engine design;
- community representatives or individuals living with aircraft noise; and
- local authority representatives who have already developed expertise in aviation.

7.16. Sunset Review

7.16.1. A few respondents, including organisations from various categories, express support for the proposal for a sunset review of ICCAN after five years. Some of these respondents envisage that the review will result in ICCAN’s functions being redistributed; others predict that its functions will be expanded.

7.16.2. However, a greater number of respondents object to the five-year sunset review. Many of these respondents – who include community groups, local authorities, individuals and a statutory body – express the view that the need for ICCAN is likely to be a long-term or permanent one, and that a sunset review would therefore not be appropriate. One respondent suggests that the sunset review takes place after ten, rather than five, years.

“I am concerned by the suggestion that the ICCAN may be time limited...Resident concerns about the changing patterns of aircraft noise will not be a short term phenomenon.”

Individual, User ID 116256

7.16.3. By contrast, a slightly smaller group of respondents hold the contrasting opinion that five years will be too long to wait to take stock of ICCAN’s effectiveness. These respondents include airlines, an air freight business, local authorities and business umbrella bodies. A few propose a sunset review after three years, but there are also suggestions of two years and annually.

“[We] would encourage Government to consider an earlier date of within 3 years of set-up rather than 5. If there are issues with the way ICCAN is operating it would be better to address these earlier and before final decisions on LAMP2 and runway expansion are made.”

Airline, User ID 131388

7.16.4. Finally, a few respondents suggest that specific aspects of ICCAN should be considered during its five-year review, notably its governance structure and funding arrangements.

Chapter 8: Ongoing Noise Management

8.1. Introduction

- 8.1.1. Questions 4a to 4d relate to Chapter 7 of the consultation document: Ongoing Noise Management. A number of proposals are presented in this chapter in relation to the powers and responsibilities of various bodies in relation to noise management, as well as measures to increase transparency and incentivise best practice in this area.

The balanced approach applied by the competent authority (Q.4a)

8.2. Question 4a: Overview

- 8.2.1. Question 4a asks:

Please provide your views on: 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.

- 8.2.2. Chapter 7 of the consultation document outlines the need, under European legislation, to appoint a competent authority to decide noise-related operating restrictions at UK airports, in line with ICAO's balanced approach.⁷ The chapter proposes that the competent authority vary depending on the nature of the control being considered. In this context it sets out the following routes for decisions being taken on operating restrictions:

Proposals arising inside the planning system

- **Route 1** – for operating restrictions associated with strategically significant decisions (including Nationally Significant Infrastructure Projects and planning applications that are called in or appealed) the Secretary of State will be the competent authority;
- **Route 2** - for all other planning-related operating restrictions, the local planning authority will be the competent authority.

Proposals arising outside the planning system

- For operating restrictions arising outside of the planning system (e.g. via a Noise Action Plan) the Civil Aviation Authority will be the competent authority.

⁷ The Balanced Approach framework identifies 4 pillars for managing the issue of noise in the cost-effective way: reduction of noise at source, land-use planning, operating procedures and operating restrictions – the last of which should only be applied if no other measure can address the problem.

- 8.2.3. Question 4a received 274 responses. In addition, 92 respondents commented on the balanced approach in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 4a and are included in the analysis below.

8.3. Overall support and opposition to the competent authority proposals

Overall support

- 8.3.1. Of those respondents who express overall support or objection to the competent authority proposals referred to in question 4a - including the routes for decision outlined above - the majority are supportive. Those expressing support include local authorities and community groups, as well as business umbrella bodies and a large number of airports.
- 8.3.2. Many of these responses comprise short statements of support. Of those respondents who elaborate on their reasons, a few welcome the idea of operating restrictions being decided as close to the local community as possible, and the alignment of operating restrictions with the planning system.
- 8.3.3. Some respondents express support but with a caveat – a concern or condition qualifying their support. These caveats are wide ranging and reflect the various concerns about the proposals, summarised in the rest of this chapter. A few focus on the robustness of the decision making of the proposed competent authority. For example, a few respondents request that ICCAN participate in the CAA's process when it acts as competent authority in order to support its performance.

“The arrangements appear appropriate, but much will depend upon the performance of competent agencies and robust leadership and support from ICCAN.”

Local authority, User ID 131387

Overall opposition

- 8.3.4. A minority of respondents giving an overall view about the proposals expresses opposition. The respondents include community groups, local authorities, individuals and an airport. The reasons raised by these respondents are covered in detail in the later sections of this chapter but are outlined briefly here.
- 8.3.5. Some respondents criticise the proposals on the grounds that they want to see more local decision making or participation in all decisions relating to noise operating restrictions and procedures. Some of these respondents question the designation of any airport as 'nationally significant' and specifically oppose the involvement of the Secretary of State in NSIPs, or the role of the CAA in proposals generated outside of the planning system.

- 8.3.6. A few respondents raise concerns about the ability of local authorities to act as competent authorities owing to conflicts of interest that arise from them having a financial stake in the airports in question. Others raise similar independence concerns about airports taking control of their own noise-related operating procedures. Various concerns about the responsibilities proposed for designated airports - including those in responses to question 4a - are covered in the second half of this chapter, which relates to question 4b.
- 8.3.7. Many respondents, including individuals and organisations across various categories, express concern about the ambiguity and confusion that could be caused by the multi-layered system.

“We do not support the proposal which will see in effect the creation of three levels of a competent authority. In our view it will inevitably create ambiguity and blurring of responsibility”

Local authority, User ID 131338

- 8.3.8. Some respondents express doubts about the prospect of the competent authority proposals achieving their stated aims in terms of increasing transparency and localised decision making, or contributing to more effective management of aviation noise.
- 8.3.9. Some of these opposing respondents make suggestions for alternative arrangements. These include:
- local authorities taking responsibility for all noise operating restriction decisions;
 - ICCAN taking on the role earmarked for the Secretary of State and the CAA; and
 - the establishment of another independent body.

If the DfT wants to absolve itself of responsibility ... in the way that is being proposed then it will have to set up an independent arbiter that can adjudicate in the inevitable local disputes, and in the south east the potential conflicts between competing airports in relation to the design of NPRs

Local authority, User ID 119741

Localised decision making

- 8.3.10. The proposals relating to the balanced approach and the competent authority in specific cases follow the principle stated in Chapter 7 of the consultation documents that decisions regarding aircraft noise should be made locally where possible: the local authority or the designated airports themselves. Comments relating to the

responsibilities proposed for designated airports are covered in the following part of this chapter: *Question 4b: Responsibility for noise controls at the designated airports.*

- 8.3.11. In addition to - or aside from – the proposals for the competent authority, some respondents express views on this proposed approach to localised decision-making more broadly. A small number of respondents express support for the principle of an approach based on more localised decision-making. Those who comment further state that this will allow communities greater involvement in decisions and that these decisions will better reflect local circumstances and priorities.
- 8.3.12. However, most of those who comment on this proposed localised approach to decision making are critical. Some simply state that this would be inappropriate, while others argue that central government should retain responsibility for these decisions (see 8.7.2) or question the appropriateness of local authorities and designated airports to take on these responsibilities (see below 8.5.5).

8.4. Route 1: The Secretary of State and strategic planning decisions

- 8.4.1. The consultation document proposes that the Secretary of State for Transport will be the competent authority for operating restrictions associated with strategically significant decisions, including NSIPs and planning decisions that are called in or appealed.
- 8.4.2. Of those respondents who express an opinion on this proposal, the majority – including individuals and organisations across various categories– support the proposal. These respondents welcome the idea of the Secretary of State, as an elected official at national level, deciding schemes and resolving issues of strategic importance.

“The Secretary of State has to resolve issues with a significant strategic impact for the UK.”

Community group, User ID 127451

Opposition to the Secretary of State’s role

- 8.4.3. A minority of respondents state opposition to the role proposed for the SofS, or question the ability of the SofS to perform this role. Many of these respondents want to see greater local involvement in decisions and express concern that the Government will not adequately represent the views of communities and will, at best, only stick to government policy.

“Locals need to be both informed and included on this - Westminster is too far away to have a say on this”

Individual, User ID 4842

- 8.4.4. Other respondents highlight their lack of trust in the Department for Transport. These respondents express the view that the Secretary of State does not have sufficient technical knowledge and are concerned that its decisions are likely to be influenced by the aviation industry or short-term political priorities.
- 8.4.5. A few respondents look at the NSIP/call-in process, rather than the credibility of its decision makers. A couple express the view that the NSIP process is vulnerable to abuse. For example, individual expansion proposals can be designed to fall just below the NSIP call-in threshold despite the overall long-term picture of an airport's expansion being very significant indeed.

“This exposes the inadequacy of the NSIP criterion ... Airport development occurs in stages over decades, and its trajectory must be taken into account as part of an NSIP judgement, not just the magnitude of any individual step.”

Community group, User ID 5145

- 8.4.6. Some of the respondents who object to the Secretary of State's role make suggestions for who might take on the task of strategic decision making. Some of these respondents believe that local authorities should be responsible for all decisions relating to aircraft noise. Others suggest that this role should be performed by ICCAN, or by an alternative version of this commission that would be more robust and independent.

8.5. Route 2: Local authorities and other planning-related operating restrictions

- 8.5.1. The consultation document proposes that noise-related operating restrictions associated with local planning decisions will be handled by local planning authorities. This change will apply to all airports. This proposal is underpinned by the aims:
- that noise management measures should be decided on locally wherever possible;
 - that Government involvement should be reserved for strategic decisions; and
 - that airports should have greater ability to innovate and implement best practice in noise management.

Support

- 8.5.2. Many respondents express support for the proposal. This support is voiced both in general terms – for greater local decision making – and specific terms for local authorities becoming the competent authority for planning-related noise operating restrictions and procedures.

“We support the proposal to de-designate the London Airports and give power to Local Planning Authorities to better protect their residents.”

Local authority, User ID 131283

- 8.5.3. Many of these supportive respondents express concern about the resources and capability local authorities have to assume the role of competent authority. These respondents often propose that additional funding and support should be provided in the form of training and guidance to build the expertise and capacity to review airport applications, assess their impact across local authority boundaries, and apply the balanced approach. One respondent suggests that councillor training must be extended and enforced. By contrast, one local authority notes that a local planning authority in airport expansion applications they have already imposed planning conditions and negotiated obligations. On this basis they view the proposal for the council to be designated the competent authority in such cases an extension of its current role, not a new one.
- 8.5.4. A few of these respondents highlight that work will be needed to resolve how local authorities can monitor and review noise-related restrictions on an ongoing basis as this is allowed for in the planning system.

“we would expect this allocation of responsibility to be accompanied by both guidance and appropriate training so as to create a consistency of approach and to resolve the inadequacy of the current planning system which is one not designed for the setting of noise controls at airports, together with an ongoing review of those controls.”

Local authority, User ID 127454

Opposition

- 8.5.5. However, the majority of respondents express opposition to the proposal, either outright, or by raising significant concerns as to the capacity or credibility of local authorities and the planning system to operate as envisaged in the consultation document. A number of themes emerge in these comments, including:
- local authority independence;
 - cross-boundary noise;
 - local authority expertise and resources;
 - suitability of the planning process; and
 - strategic need for central government control.

Local authority independence

- 8.5.6. Many respondents raise concerns about the capacity of local authorities to act independently. A few question the political impartiality of local authorities,

highlighting that they might change their thinking according to which political group controls the council.

- 8.5.7. However, most of these respondents raise concern about the prospect of financial conflicts of interest arising from a local authority having a financial stake in the airport submitting a planning application, or a more generally a vested interest in the revenues generated by the airport. Many cite Luton Airport in this context, claiming that the local authority that part owns this airport has not acted in an impartial way. Conflicts of interest arising from London City (Newham), Gatwick (Crawley) and Manchester are all also mentioned.

“LAs have agendas and welcome the financial contributions from revenue from the airport and the increase in productivity of the local economy derived from the airport.”

Local authority, User ID 4371

- 8.5.8. Many respondents, including individuals and organisations across various categories, question the ability of local authorities to detach themselves from the interests of local residents sufficiently to meet the European requirement to appoint a competent authority. The European Regulation (EU598/2014) demands that the competent authority be independent of all interests affected by noise-related action, including ‘residents living in the vicinity of an airport’. One respondent argues that local authorities need more rigorous and transparent standards to identify and manage potential conflicts of interest.

Cross-boundary noise

- 8.5.9. Many respondents note that aircraft noise does not confine itself to the local authority area in which an airport is situated. They express concern about a single local authority making noise-related decisions that will affect communities across multiple local neighbouring areas, and further afield where noise disturbance remains a factor.
- 8.5.10. Some respondents suggest that, based on their experience, decision-making authorities would be likely to disadvantage communities outside of its boundaries.

“Most often the local authority that manages the airport decides the flight paths should be over neighbouring authorities. Those neighbouring authorities are then helpless to do anything for its residents.”

Individual, User ID 4687

- 8.5.11. Some respondents argue that a coordinated approach between authorities is needed to address this problem. A few suggest overarching bodies that could take an overview of conflicting local concerns (e.g. the GLA for London airports), while others suggest there be a joint competent authority that encompasses all affected local

authorities. One respondent proposes a combination of the two: a committee made up of all authorities overflowed at a height of less than 7,000 ft. to form a single competent authority. However, many of those who raise the issue of cross-boundary noise wish to see operating-restriction decisions (particularly relating to night flights) for designated airports stay with central Government.

Local authority expertise and resources

- 8.5.12. Many respondents raise concerns about the technical, practical and financial capacity of local authorities to perform the role of competent authority. As mentioned above (8.5.3), many respondents also express concern as to whether local authorities will possess the skills and experience required to meaningfully contribute to the noise management process. A few respondents express more specific concern that funding constraints have affected local authorities' expertise on noise and the ability to fight planning appeals, leaving them vulnerable to applicants with the resources to finance an appeal.

“the planning process is open to appeal and due to austerity local authorities no longer have the budget to fight long protracted appeal processes which has previously been taken advantage of well financed large companies and developers.”

Local authority, User ID 122106

Suitability of the planning process

- 8.5.13. Many respondents question the suitability of the land use planning system as a framework through which to apply noise-related restrictions. Many of these responses highlight that planning restrictions are imposed at a single point when an application is granted and that, in the case of large airport planning applications with noise-related aspects, these points come along only infrequently. These respondents argue that this makes the planning system unsuitable for noise restrictions such as night flight regimes that – unlike the one-off building of a structure – require on-going management and review.

“many of the noise management controls do not fit well within the planning process and it does not provide flexibility to make improvements in the light of improving technology or new understanding of health impacts from noise. The planning system will only be relevant when an application has been made and only then when the proposed conditions are related to material planning considerations.”

Local authority, User ID 4931

- 8.5.14. One respondent notes that Section 106 agreements often contain time limit clauses and asks how this will affect the on-going application and management of noise-related restrictions.

8.5.15. Some respondents point to the failure of local authorities to impose planning restrictions in the past when they had the capacity to do so, in particular the 2009 planning permission for extension of Gatwick’s North Terminal that included no noise restrictions.

Need for strategic/government oversight

8.5.16. Some respondents reject the proposed role of local authorities on the grounds that noise-related operating restriction decisions should be made at a strategic/national level. A few airlines and a business umbrella body hold this view.

8.5.17. A few of these respondents highlight that operating restrictions could have implications on air traffic at a national or regional level (including safety implications) and express the view that these decisions should therefore be taken at a national level. Another airline respondent expresses concern that, as drafted, there is scope for certain planning decisions on nationally significant infrastructure to be taken by local authorities. They argue that operating restrictions for nationally significant infrastructure should be determined by the Government.

“[X] does not believe it is appropriate for airports alone and local authorities to have a role in determining operating restrictions for nationally significant infrastructure. This role can only be performed by Government.”

Airline, User ID 131388

8.5.18. Other respondents express the view that Government has a responsibility to local communities which it is seeking, through the proposals, to offload onto local authorities.

“it seems to us that in several areas in this consultation, the government is seeking (despite its being the only democratically accountable entity in the whole process) to abdicate its responsibility towards communities affected by aircraft noise.”

Environment group, User ID 131269

8.5.19. Other concerns relating to local authorities acting as the competent authority include:

- that the proposal restricts the Local Planning Authority (LPA) role to cases only where there is a planning application;
- that fines introduced by airports have shown to be ineffective;
- that the severity of the controls may fluctuate according to the political control of the council; and
- that there is a lack of detail provided as to the statutory framework that it is envisaged local authorities could work with.

8.6. The CAA and non-planning related operating restrictions

- 8.6.1. The consultation document proposes that noise-related operating restrictions arising outside of the planning system will be decided by the CAA acting as the competent authority.
- 8.6.2. A few respondents – including local authorities, an airport and a statutory body - welcome this proposal, viewing the CAA as an appropriate body to take on this role.
- 8.6.3. A few of these respondents caveat their support by suggesting that CAA will need some scrutiny from ICCAN to ensure that its decision making is impartial.

“We support the Government's proposal that for decisions taken outside of the planning process, most notably the agreement of a noise action plan every five years at major airports, the CAA would be the appropriate competent body.”

Airport, User ID 131391

- 8.6.4. The majority of respondents commenting on this proposal – many of them community groups and individuals – do not support CAA becoming the competent authority. Of those who give reasons for their opposition, many raise the issue of independence. These respondents express the view that the CAA is too close to the aviation industry to be an impartial assessor of noise-operating restrictions.

“the CAA has primary legal duties to meet the needs of the aviation industry and its consumers so is not well-placed to make a dispassionate judgment about the appropriate application of operating restrictions.”

Environment group, User ID 3653

8.7. Alternative proposals

- 8.7.1. In their responses to question 4a, respondents put forward various suggestions for alternative arrangements for the management of noise-related operating restrictions. These fall into the following categories:
- maintaining central government control;
 - a single competent authority; and
 - greater community influence.

Maintaining centralised oversight/control

- 8.7.2. Some respondents express a preference for the DfT/SofS retaining its current broader role - especially with regards to noise operating restrictions and procedures at designated airports. They do not wish to see these airports de-designated.

“Government must continue to take the lead in managing the Balanced Approach and setting key noise management elements at nationally significant airports”

Airline, User ID 131379

- 8.7.3. Many of these respondents see the Government (DfT) as being the only body with sufficient overview and independence to make these types of decisions, particularly in relation to night flights.
- 8.7.4. A few respondents suggest that designation be actually expanded to include additional airports (particularly Luton) where they perceive there to be issues of local authority independence or competence.
- 8.7.5. Other respondents – including business umbrella bodies, local authorities and an airport – are not convinced that local authorities are able to adequately perform the competent authority role, or satisfy the EU requirement for impartiality (EU598). Consequently, they request that the competent authority is, in all cases, a central government body (either DfT or CAA).
- 8.7.6. A few respondents simply ask that the Secretary of State’s powers be increased to include broad oversight of all decisions relating to aircraft noise.

“The Department for Transport should retain all control over aircraft noise. It alone can stand up to the powerful interests involved. It alone can cope with the complexities resulting from geographical spread of parties affected by any change in flightpaths or frequencies.”

Individual, User ID 3968

A single competent authority

- 8.7.7. Some respondents raise concerns about the confusion and ambiguity that could be created by the complex system being proposed. A few express concern that this would lead to frustration amongst the different stakeholders involved. Others raise concerns about the independence, suitability and capacity of the various competent authorities being proposed. Collectively, these concerns lead some respondents to propose that a single competent authority take on some, or all, of the decisions that the consultation divides between the Secretary of State, local authorities and the CAA.
- 8.7.8. These respondents see the potential benefits of a single competent authority as being its simplicity, and the ability to apply the balanced approach consistently and expertly.
- 8.7.9. Ideas range about what the single authority might look like. A few respondents see ICCAN, CAA, or the two working together, as natural destinations for the competent authority role. Others express the desire to see a more robust regulatory version of ICCAN (closer to the model proposed by the Airports Commission) take on the role.

“The Authority believes that in the case of NSIPs and restrictions outside of the planning process ICCAN (or another independent body) should be set up with suitable formal regulatory powers to make it the competent authority in assuring a balanced approach, with a duty to consult the airports, local communities, and the CAA.”

Local authority, User ID 4353

8.7.10. One airport respondent suggests that the CAA should be the competent authority in all circumstances, except where the operating restriction is part of a decision already being made by the Secretary of State – for example DCO applications and called in airspace change proposals. In these latter cases they believe the CAA should provide input to inform the SofS’s decision.

8.7.11. They also argue that the CAA, should provide expert opinion to the SofS with regards to called in applications.

Greater community influence

8.7.12. Many respondents take an opposing view of the Government’s role and ask instead for greater community involvement in decisions relating to noise operating restrictions. Their suggestions include:

- that all decision-making bodies should involve lay people, particularly those affected by aircraft noise;
- there should be stricter requirements to consult with local communities; and
- that all decisions should be made locally.

The local communities and local authority should have the final say. Government does not have the interests of local communities at heart.

Individual, User ID 113582

8.7.13. In this context, a few respondents propose that ICCAN could have a valuable role to scrutinise the performance of competent authorities – central and local – checking to see that local views are being taken into account.

“We therefore urge the DfT to ensure that ICCAN is constituted so it can add a level of independent oversight capable of ensuring that apparently “competent” authorities are indeed competently regulating the local noise impacts of aviation.”

Community group, User ID 5145

Noise controls at the designated airports (Q.4b)

8.8. Question 4b: Overview

8.8.1. Question 4b asks:

Please provide your views on 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.

8.8.2. Chapter 7 proposes that responsibility for setting noise controls (other than noise operating restrictions) at the designated airports are transferred to the airport operator itself, as is currently the case at non-designated airports. The aim of this change is to ensure that solutions are developed locally where possible, and to give airports more flexibility to develop innovative and bespoke solutions that reflect best practice.

8.8.3. The consultation document explains that, under this approach:

- the Secretary of State would still have a role in approving any noise controls associated with NSIPs (e.g. development of a new runway at Heathrow Airport);
- local planning authorities would still have a role in noise controls connected to planning applications made by airports; but
- outside of the planning process, airports would make changes to noise controls as and when they were needed.

8.8.4. Question 4b received 276 responses. In addition, 72 respondents commented on the noise controls proposals in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 4b and are included in the analysis below.

8.8.5. As in responses to question 4a, in responses to question 4b many respondents comment on the proposal to transfer responsibility for certain controls to local authorities, in addition to the responsibilities proposed for designated airports. These comments are covered in the summary of responses to question 4a, above (see 8.5).

8.9. Overall support and opposition to the proposals

Overall support

8.9.1. Many respondents express overall support for the proposals mentioned in question 4b. Those who elaborate further express general support for localised management of noise, or state that the proposals take good account of established relationships at local levels.

- 8.9.2. Some respondents attach a caveat to their support. This generally relates to a concern that airports are overseen independently, comply with standards and have enough resources to manage and monitor noise.

Overall opposition

- 8.9.3. The majority of respondents who express an overall opinion about the proposals express opposition to what is proposed. Many of these respondents – including community and environment groups, local authorities and individuals - express a lack of confidence in the ability of airports to manage their own noise controls. Many argue that as commercially-driven organisations, airports have a vested interest in not regulating noise effectively. One of these respondents likens the proposal to airports ‘marking their own homework’.
- 8.9.4. Some of these respondents see noise controls as a responsibility of central Government that should not be abdicated. Many request that noise limits be set nationally, enforced legally, and targeted at lowering aircraft noise and pollution.

“Totally disagree. Airports cannot be trusted to do this. Noise control should be independently overseen, managed and monitored.”

Individual, User ID 4384

8.10. Proposed role of designated airports – support and opposition

Support

- 8.10.1. Some respondents - including airports and local authorities, as well as an air freight business - support the proposed role of designated airports. They believe that airports are well-placed to liaise with their local communities on noise management and to understand local priorities. A few respondents express particular support for Noise Preferential Routes (NPRs) being managed at a local level, suggesting that would allow noise issues to be addressed more thoroughly.

Opposition

- 8.10.2. Many respondents express concern about giving designated airports increased responsibilities in terms of ongoing noise management. They argue that this would allow airports to undermine the authority of local authorities, and that these airports are not locally accountable or sufficiently impartial enough themselves to determine fair noise controls. A few respondents state that they believe that such controls should not be put into the hands of commercial businesses. Those respondents who are critical of this proposal include a number of local authorities, as well as environment and community groups and a few airlines. One airline expresses concern that the proposal could lead to different policies in terms of concentration and dispersal at different airfields which would make a coherent policy very difficult to

achieve. The same respondent also expresses concern that there is a lack of expertise for developing locally defined noise management systems.

“The shift towards airfields developing locally defined noise management systems will require increased levels of expertise which is at a premium. We would not want the lack of expertise in such systems to prove detrimental to our need for much needed airspace developments”

Airline, User ID 124824

- 8.10.3. Many respondents express mistrust of airports, noting previous decisions such as the Gatwick Route 4 routing change as examples of when airports are considered to have not taken account of community complaints. Respondents also note that Airport Consultative Committees (ACCs) are often powerless in standing up for communities. A few argue that the proposal to transfer additional powers to airports would erode trust further.
- 8.10.4. Many respondents also note the conflict of interest between maximising flights and reducing aircraft noise, and do not believe that the airports would be sufficiently incentivised to introduce measures that are costly or impact on operations. These respondents do not believe that airports will be able to find a reasonable balance between community interests and economic goals.
- 8.10.5. A few respondents are particularly opposed to transferring control of night flights to airports. Others oppose transferring control of changes to Noise Preferential Routes (NPRs). These respondents - including community groups, local authorities and individuals - argue that any changes to NPRs may negatively impact on house prices and local planning. Some respondents also question how effectively Noise Management Boards (NMBs), if given the power to set noise controls, would be able to force airports to take action against their commercial interests.

8.11. Alternative suggestions

Designated airports

- 8.11.1. A large number of respondents make suggestions regarding the proposed role of the designated airports. Suggestions include that:
- airports should work with Government or local authorities in administering noise controls;
 - all UK airports should be covered by the proposals (not just those which are designated);
 - there must be coordination on practices between airports;

- there should be a compliance mechanism, for example penalisation by way of financial levy which contributes to community compensation;
- airport management of noise must be seen to only lead to reduced noise levels, not increased levels;
- airports should have responsibility for *implementing* changes to noise controls, not *controlling* them; and
- Luton should be a designated airport, particularly as it is expanding.

Role of Government

- 8.11.2. Many respondents, notably local authorities and community groups, suggest that the Government should retain the role of managing noise controls at the designated airports. They believe that it is an issue of national policy and is therefore the Government's responsibility. Respondents feel that only the Government has the incentive to take a balanced approach, weighing up both industry and community priorities. A few respondents argue that if, as the consultation document states, the Government's involvement is 'bureaucratic', then the solution is to become a better regulator, not to give up its role altogether. One respondent also notes that Government control would ensure the ability to maintain oversight and intervene in the future if needed.
- 8.11.3. Others accept that airports and local authorities may contribute to setting controls, but believe that the Government should have overall oversight, so as to provide a safeguard in balancing priorities.

“we do not consider that simply trying to shift responsibility in this area away from central Government and on to local authorities, airports themselves or the CAA is an adequate response to what remains a regulatory gap in our view”

Environmentl group, User ID 3653

- 8.11.4. A couple of respondents oppose government control, believing that it is biased towards the aviation industry in decisions concerning aircraft noise.

Role for ICCAN

- 8.11.5. Alongside the competent authority proposals, Chapter 7 of the consultation document proposes that ICCAN play a role in developing best practice in noise management and monitoring compliance.
- 8.11.6. Many respondents comment on the role of ICCAN. Some emphasise the need for independent oversight in general, and a few support the role as proposed, believing ICCAN's input will ensure balanced solutions.
- 8.11.7. Many respondents, notably local authorities, feel that the role for ICCAN should be greater, perhaps even to oversee the whole process. They emphasise ICCAN's

independence and ability to facilitate discussions between different groups. They also note that it will have the expertise and data necessary for such a role.

8.11.8. Other respondents believe ICCAN as proposed would be unable to carry out the role proposed for it in terms of ongoing noise management. They express concern that ICCAN is unlikely to have the resources to review decisions, or the powers to enforce them. A few also raise concerns that it will not be completely independent from the CAA.

8.11.9. Some respondents suggest that if ICCAN is to have this role, it must have enforcement powers in order to bring airports into compliance.

“Experience indicates that it is hard for unfunded community groups to engage in decision making with the professionals in airport, airlines, CAA and NATS. We need ICCAN to play a role in ensuring a balanced process and being able to enforce this not just advisor”

Individual, User ID 4796

8.11.10. Other suggestions regarding the role of ICCAN include:

- a mechanism whereby ICCAN could be called in if local communities did not believe the designated airport was acting in their interests;
- that ICCAN should publish information (for example noise exceedances); and
- that ICCAN should monitor noise impacts.

Role of local communities

8.11.11. Many respondents comment on the role of local communities. Most of these comments are supportive of communities having a role or influence in controlling noise limits. These respondents ask that communities have a ‘meaningful’ role in decision-making, rather than just being informed of changes as they happen. One respondent emphasises that the mechanism for local engagement must be well-understood.

“We would expect designated airports to consult with local communities in a fair and consistent transparent manner before making changes to controls 'as and when they are needed'. Without consultation, the government is giving airport operators the freedom to inflict noise on local communities as and when the please”

Local authority, User ID 137684

8.11.12. Some respondents make suggestions regarding the role of local communities. These include:

- that each airport should have a local committee which should agree the operation service level of air travel in that area;

- that engagement with local communities should be encouraged through NMBs at which certain requirements are met (for example local communities are represented by at least 50 per cent of the attendees); and
- that levels of compensation should be agreed with communities.

Other suggestions

- 8.11.13. Many respondents make other suggestions on the process as a whole. Some believe that there should be stricter regulation, such as legally-enforced noise limits, or nationally-set limits. A few also emphasise the importance of effective compliance mechanisms, such as fines for airports and airlines.
- 8.11.14. Some respondents believe that there should be an appeals process acting as a channel through which communities could express their concerns. Similarly, one respondent suggests a dispute-resolution mechanism could be established.
- 8.11.15. Some respondents express concerns about the efforts to ‘localise’ decision-making in general. One airline is concerned that inconsistency between local policies to mitigate noise could inhibit airspace change proposals. Another respondent fears that the process will be long and slow. One local authority expresses disappointment at the lack of a more detailed framework to be utilised by the airport operator or the local authorities to develop and implement local solutions.
- 8.11.16. A few respondents note the importance of ACCs in the process, but emphasise that they must be given more powers so that they are not ignored (one respondent cites Luton ACC as an example of where they believe this has happened).
- 8.11.17. Some respondents, notably local authorities and community groups, criticise the proposal for being too complex and confusing. One respondent for example states that they are unclear of the benefits and/or potential negative impacts of transferring the ownership of the NPRs to the designated airports.
- 8.11.18. Others ask for clarification on:
- why only designated airports are included in the proposal;
 - the role of the CAA;
 - what happens if the airport and local community cannot agree about the way forward; and
 - what incentives industry has to consider local communities.

Publishing aircraft data (Q.4c)

8.12. Question 4c: Overview

8.12.1. Question 4c asks:

Please provide your views on 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.

8.12.2. Question 4c received 284 responses. In addition, 12 respondents commented on the proposal for designated airports to publish details of aircraft tracks and performance in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 4c and are included in the analysis below.

8.12.3. The proposal includes the following details:

- designated airports to publish data on their departure routes and track keeping performance; and
- in terms of other airports, it is proposed that all major UK airports publish similar data where practicable. The exact information published should be determined by airports in consultation with local communities.

8.12.4. The draft Air Navigation Guidance document provides more details on what designated airports are expected to publish in terms of where aircraft are flying and the amount of noise created. The guidance states that airports can determine the precise information they wish to publish but should include:

- the average distance of how close to the standard instrument departure route the aircraft have flown up to an altitude of 4,000 feet or higher if the airport wishes;
- the areas, and the specific number of departing aircraft, where 80%, 90%, 95% and 99% of air traffic has flown up to an altitude of 4,000 feet and the noise level in each of these areas; and
- they should also provide details on the areas overflown by arriving aircraft from an altitude of 4,000 feet to when they reach the runway.

8.13. Overall support for and opposition to the proposals

Overall support

8.13.1. The majority of respondents who responded to the consultation question, express support for the proposal that designated airports should publish details of aircraft tracks and performance. Many agree that this would provide greater transparency to communities, improve community engagement and build trust between local people and the aviation industry. Some respondents believe this data would be particularly useful when local residents perceive a change in aviation noise, helping them to highlight the extent of the problem and hold airports accountable. Another hope is that the published data would encourage a more open analysis of different route options. Some respondents acknowledge that publishing data would require airports to commit additional resource but feel that the potential benefits of building trust amongst communities and increased acceptance of changes are more important.

“The benefit of doing this could be immense. It could show that there are ways to manage a modest increase in capacity whilst sharing noise to an extent that more people are happy to take some limited share of the burden. The gain to industry of achieving that would dwarf the costs of creating the maps”

Local authority, User ID 140885

8.13.2. Some respondents add caveats to their support for the proposals, including that:

- data should be detailed, comprehensible and accessible enough to be useful for local communities;
- data should be used to inform decision-making;
- data should be should be independently checked to ensure it is truthful;
- data should be should be available in real-time format; and
- that the publishing requirements must be complied with.

8.13.3. These topics are reported on in more detail below.

8.13.4. Many respondents support the proposal for designated airports to publish data but would like to see publishing requirements consistently applied across all airports.

8.13.5. Other respondents, including local authorities, community groups and individuals, express support for the principle of publishing data to build transparency, but believe that more needs to be done to reduce noise impact on communities.

Overall opposition

8.13.6. A minority of respondents express opposition to the proposal. The main concern is that publication of data would not help reduce noise levels and so would not bring any benefit to communities. A few respondents mention previous experience of flight tracking tools, saying they have not helped resolve noise issues. A few respondents are concerned that publication may make the current situation worse, either by impacting property values or by escalating any conflict.

“However, in our experience sometimes providing more information can 'inflate' the issue. We prefer, where possible to meet with residents and help resolve issues face to face”

Airport, User ID 131382

8.13.7. Some respondents challenge the proposal to ‘encourage’ major airports to publish data, saying instead that these requirements should be mandatory. Respondents cite lack of trust in airports as justification for this, believing enforcement would help restore community trust. Some say the proposals should apply to all airports, or all major airports, rather than just designated airports.

“There should be no get-out clause, no 'encourage', no 'where practicable'. it should be a statutory requirement of all operators”

Individual, User ID 3085

8.14. Current availability of flight data

8.14.1. Many respondents comment on the current availability of flight data. Many argue that most of the data listed in the proposals is already made available by some airports, or through third parties. Examples given of current good practice include:

- Heathrow Airport’s work with communities to create bespoke reporting templates;
- London Luton Airport’s flight tracker;
- Bristol Airport publishing track-keeping performance by airline with an award for best performance;
- Stansted Airport’s four-day visual display of sample track data during the summer period; and
- Gatwick Airport Caspar complaints and tracker system.

8.14.2. The website flightradar24.com is mentioned as a useful third-party source of flight tracking information, as is Defra’s publication of noise mapping and the CAA’s arrivals and departures maps. In light of this, some respondents ask for clarity on what changes are being proposed in the consultation.

8.14.3. On the other hand, many respondents have found it difficult to obtain flight tracking data for their local area, or consider the existing published data inaccurate. Some of the airport publication mechanisms mentioned above are criticised for underreporting complaints, being too slow, or making data hard to interpret or analyse.

8.15. Local determination of reporting requirements

- 8.15.1. Opinions vary about how prescriptive the publication guidance should be. Some support the proposal that, beyond the list of minimum requirements for designated airports, the content and format of the published data should be at the discretion of the airports, in consultation with communities. This support mostly comes from airports, business umbrella bodies, and statutory bodies, although a few local authorities also express support for local determination. Community involvement is welcomed, with one airport saying it would work with local consultative bodies to agree the details.
- 8.15.2. One reason given in support of local determination is the cost and resource involved in data publication. Respondents, particularly airports, comment that the requirements would need time and money to be implemented. They ask that data requirements are proportionate to airport size and to the impact on local communities.
- 8.15.3. However, other respondents, mostly individuals, community groups and some local authorities, believe this approach would give airports too much lee-way, and ask that the Government is more prescriptive about what data should be published and how often. A few respondents, particularly local authorities, also believe that having standardised requirements would facilitate comparisons across airports or over time, and take the burden off airports to establish local requirements.

“Having a standard list of what data should be published and in what format would make the process of comparison year-on-year and airport-on-airport more straightforward and reduce the burden on airports to decide what and how they publish it”

Local authority, User ID 131289

- 8.15.4. One respondent is concerned that factoring in local community views could disadvantage some airports where attitudes to noise are more negative. It also asks what constitutes a ‘major’ airport, as referred to in the consultation questionnaire.

8.16. Suggestions on publishing aircraft data

- 8.16.1. Respondents put forward various suggestions relating to the proposal to publish aircraft tracks and performance data. These suggestions cover:
- data requirements: what type of data should be published;
 - data publication methods: where and how data should be published;
 - data verification: how data should be verified in order to ensure accuracy and trust;
 - the data collection process: how noise data is measured; and
 - other comments on the proposal in question.

Data requirements: the type of data to be published

8.16.2. Many respondents provide suggestions on the type of data that should be published. Broadly, respondents want data which will:

- help communities compare and analyse aircraft noise across space and time;
- build their trust in industry adherence to noise level standards;
- and enable residents to make complaints when aircraft noise levels are exceeded.

8.16.3. Suggestions for what information should be provided are outlined below.

Noise and air pollution levels

8.16.4. Some respondents ask for noise level data to be published. A few respondents question why noise and overflight data above 4,000ft is not required, with a few respondents suggesting this information should be available beyond 7,000ft. Others say that peak noise levels should be made available, rather than just the average noise level. Respondents feel this would help monitor adherence to noise level requirements, some requesting that published data include details of noise level breaches or complaints, and that subsequent actions are taken. One local authority suggests publishing comparative airport noise tables to encourage those airports to take steps to improve noise environments.

8.16.5. A few respondents ask for air pollution data to be published alongside noise levels.

Flight paths and heights

8.16.6. A common suggestion is to provide data on flight paths and aircraft altitudes to enable respondents to monitor ongoing airspace use and estimate noise impact for themselves. Some respondents suggest a ‘heat map’ would be helpful so that residents can see their overflight in terms of altitude and frequency, or identify areas where flight paths are concentrated. Others ask for flight path information broken down by route, runway, and time of day. In terms of altitude, respondents ask for an option to see heights above ground level as opposed to sea level, as well as information on departure and arrival gradients as this is seen as an important contributor to noise levels.

8.16.7. Respondents also ask for data to be published relating to changes in current airspace use, and the reasons for these changes. This includes changes in direction of take-offs and landings, changes due to trials, as well as potential future flight paths changes, with a projection of what this would look like so a comparison can be made. However, one business umbrella body is concerned that forecasting could be misleading, and suggests that only retrospective data should be published.

8.16.8. A few respondents question the fact that the current proposal does not require publication of detailed arrival data. They consider arrival noise impact to be similar to or greater than that of departures, and would like to see more arrival data published.

“Arriving aircraft are frequently those which cause most noise intrusion at anti-social hours (ie late evening & night flights and early morning long-haul)”

Environment group, User ID 131377

Flight times

8.16.9. Respondents, particularly individuals, often ask that flight times are published alongside flight path and height data. Some say this would help them factor upcoming aviation noise levels into their plans, particularly by showing respite periods.

“We need to know when aircraft are landing and on what runway from what direction. We can then shut the windows!”

Individual, User ID 106598

8.16.10. Some respondents suggest that it would be useful for this data - including respite periods - to be measured and available for comparison between areas around various airports.

Aircraft type

8.16.11. Respondents ask that aircraft data is published to ensure balance against noise issues. Specific details requested include:

- the size and type of the aircraft;
- what the aircraft is carrying;
- average occupation rate per plane;
- track-keeping accuracy;
- number of flights by aircraft type and airline;
- the fleet mix of the airline; and
- flight efficiency and capacity of the aircraft.

Trends

8.16.12. As well as snapshots of flight data, some respondents would like to be able to identify trends in airspace use. They ask to see historic data and comparison with previous performance, with a suggestion that any explanation for trends or changes in airspace use is included.

Other suggestions

8.16.13. Other specific requests and suggestions are:

- to publish data for the whole of the flight path above land, rather than just surrounding the airport;

- to include data on helicopter routes, particularly around Northolt;
- and to refer to the reporting techniques outlined in the ‘Supplementary Green Book Guidance: Accounting for Environmental Impacts’.

Data publication methods

User-friendly

8.16.14. Respondents say that the published data should be presented in a user-friendly manner and as clearly as possible. A few respondents believe that a standard format should be prescribed to facilitate this.

Accessibility

8.16.15. Whilst there is some concern about the safety and security of the information, most respondents want the information to be widely accessible. One respondent adds that data should be shared with all communities impacted by noise, not just those surrounding airports.

Storage and sharing

8.16.16. Respondents provide a range of suggestions for how best to share the data.

8.16.17. A few believe that the data should be collated and stored on a central online system. Others suggest the data is made available on airport websites, mentioning Heathrow’s Webtrak site as an example. Other suggestions include an app or electronic message boards.

8.16.18. Others focus on methods to share the data more locally, acknowledging that not everyone has access to the internet. Respondents suggest going through channels such as relevant authorities, consultative committees, local noise fora and local newspapers. One respondent suggests working with existing consultation fora to agree the best strategy for sharing information locally.

8.16.19. One respondent suggests that information about local communities affected by overflight, and the measures taken to lessen air pollution and noise impact, be read out on-board flights before take-off.

Publication frequency

8.16.20. Some respondents ask that data is published regularly to enable performance comparisons over time. Suggested intervals vary but include monthly, every three months and annually. One business umbrella body suggests that this interval should be set by the airport. A few respondents ask that the unfiltered data should be available online in real-time.

Data verification

8.16.21. The proposals state that ICCAN should play a role in verifying noise data.

8.16.22. Some respondents, including local authorities and airports, say that the reporting process and outputs should be independently verified. Many of these respondents feel this is essential to build community trust in the accuracy of the data, with some local authorities and individuals referring to current lack of trust in airports. This monitoring process is considered worth the cost, with one respondent suggesting that any audit should be paid for by the airports.

“[We] believe that independent auditing of the system and its outputs, and/or oversight by a recognised independent body will be essential if the additional noise information is to achieve the key objective of building trust with local communities”

Airport, User ID 4882

8.16.23. Some support ICCAN playing this role in principle, whilst reiterating earlier comments about the importance of ICCAN being truly independent.

8.16.24. In terms of the process for verification, a few suggestions are made including:

- independent sample checking with sanctions for underestimates;
- an occasional audit carried out by ICCAN; and
- submission of data reporting headlines to ICCAN for review.

8.16.25. Other suggested roles for ICCAN in this process are:

- to act as final decision-maker in relation to what information is made available;
- to review the relevance of data;
- to receive complaints on noise level infringements;
- to deliver appropriate sanctions for non-compliance; and
- to advise on accessibility of the information.

8.16.26. One respondent asks what recourse there will be for communities to challenge data or decisions about what to publish.

Data collection process

8.16.27. Respondents make some comments about data collection procedures. Some would like to see noise monitoring equipment installed more widely, for example in all impacted communities. A couple of respondents, including one airport, believe the cost of this should be covered by the airports themselves.

8.16.28. Other requests include that noise impact is measured before any airspace changes are implemented, and that airports conduct noise level testing in areas where complaints are made.

8.16.29. A couple of respondents, including a business umbrella body, ask that airports are given time for any new monitoring tools to be developed.

Other comments on the proposals

8.16.30. A few requests for further guidance are received:

- on the scope and level of detail required so that airports can develop their reporting systems; and
- on the role of ICCAN in the assurance process.

8.16.31. One airport adds that the publication requirements need to be consistent with requirements placed on airports as part of the tier 3 airspace changes proposals.

Incentivising industry (Q.4d)

8.17. Question 4d: Overview

8.17.1. Question 4d asks:

Please provide your views on 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.

8.17.2. Question 4d received 275 responses. In addition, 48 respondents commented on whether the industry is sufficiently incentivised in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 4d and are included in the analysis below.

8.18. Incentives are sufficient

8.18.1. Many respondents, including airlines, airports and local authorities, consider industry to be sufficiently incentivised to adopt best practice in noise management. Some add that additional incentives beyond those proposed in the consultation are therefore not necessary, or that current incentive levels should be reduced.

Current good practice

8.18.2. Respondents refer to examples of existing good practice in the industry, with airlines and airports pointing out that some of these were implemented voluntarily. Examples given include:

- improved arrival and departure procedures, including reduced holding;
- implementation of multiple routes;
- investment and introduction of quieter aircraft;
- use of noise envelopes;
- community engagement;
- night flying restrictions and penalties; and
- the application of landing charges to incentivise noise reduction.

- 8.18.3. Some respondents, including a community group and a local authority, refer to existing good practice in local community consultation. One airport comments that being a good neighbour to local communities provides enough incentives to industry to manage noise.

“We believe that an airport operator's standing in the local setting with its stakeholders is sufficiently important that it has a strong incentive to examine and continuously improve the way it manages noise”

Airport, User ID 131391

- 8.18.4. One supporting argument for keeping incentives the same is the claim that noise impact is already being reduced. A few respondents cite reports and statistics showing a reduction in the number of people affected by significant noise, or an increased use of quieter aircraft. For example, one refers to a review by Sustainable Aviation of noise contour information across several major airports which showed that the number of people inside the 57 dB LAeq noise contour reduced by nearly 40% between 1998 and 2010.

Existing measures

- 8.18.5. Some respondents argue that existing regulations and guidance are enough to incentivise industry to manage noise. Respondents refer to the European Union requirement for airports to develop Noise Action Plans, CAA guidance on best practice; the proposals in the separate consultation on CAP 1520, and targets set in 2000 by the Advisory Council for Aeronautics Research in Europe (ACARE).
- 8.18.6. One respondent comments that introducing additional incentives may be difficult, because there will always be cases where noise reduction measures need to be overridden for safety reasons.

Reduce/oppose use of incentives

- 8.18.7. A few respondents would like to see industry incentives to improve noise management reduced or removed altogether. One respondent opposes the application of industry incentives to improve noise management. They consider safety to be paramount and believe that introduction of more incentives could put safety at risk, by potentially encouraging procedures which do not optimise safety. Others are concerned that increased incentives and requirements to consult local communities could slow down airspace modernisation, or that other stakeholders such as local authorities are better placed to manage noise levels and therefore incentives and responsibility should be focussed there instead.

“It is important that a balanced approach is taken to establishing envelopes or any other incentives scheme, as they must not unduly elevate community impacts over enhancements in safety which should remain the primary goal; and efficiency gains and capacity

enhancements that are important to the ongoing health and competitiveness of the UK aviation system.”

Air navigation service provider, User ID 124827

Support incentives in principle

- 8.18.8. Some respondents support the principle of incentivising industry to reduce noise levels through improved technology and operational management, without saying whether the current and proposed incentives are sufficient.

8.19. Incentives are insufficient

- 8.19.1. Many respondents, particularly community groups, local authorities and individuals, do not consider industry to be sufficiently incentivised to adopt current best practice in noise management. They cite reasons such as conflict of interest, current examples of bad practice, and limited progress to date. Some respondents specify that the proposed changes outlined in the consultation do not address their concerns, as they believe the current proposals prioritise economic benefits over environment and communities.

“There is no evidence that the industry is sufficiently incentivised to adopt current best practice in noise management, or that it would be were the proposals in the consultation to be adopted”

Community group, User ID 124818

Industry conflict of interest

- 8.19.2. A common justification for increased incentives is that industry’s main motivations are to maximise profits and reduce costs. Respondents believe that this means industry will prioritise increasing flight activity, maximising return to shareholders, and minimising maintenance and operational costs over noise reduction objectives. Some feel that industry will therefore only do the minimum required to manage noise impact.

“We consider it would be a retrograde step for the Department hand over responsibility for noise management to commercial airports – which have a legal responsibility to its shareholders to maximise profits”

Statutory body, User ID 5270

- 8.19.3. Some respondents say that the current or proposed policies are not sufficient to counteract these profit motivations, and therefore more incentives are needed.

8.19.4. One respondent adds a further concern that industry motivation to manage noise may be reduced if funds from the European Union for aviation research are lost.

Examples of bad practice

8.19.5. Respondents provide many examples of perceived bad practice by the aviation industry, to illustrate their points that industry is not currently sufficiently incentivised.

8.19.6. Specific airports, particularly Gatwick, Heathrow and Luton, are singled out for examples of bad practice. Cited behaviour includes:

- dismissing community concerns about noise;
- flying at lower altitudes and shallower descents than advised by best-practice;
- waiving landing charges at night in order to fill up capacity;
- deviating from scheduled flights, particularly at night; and
- not fining airlines for noise breaches.

8.19.7. Some respondents give a specific example of large aircraft such as A380s flying at low altitudes to avoid engine wear. They say that even though these aircraft are technically quieter, by flying lower they create more noise for communities.

“The operation of larger planes such as the A380, B747, and B777, utilising operating procedures incorporating low climb rates to minimise engine servicing costs, but increasing community exposure to engine noise, is an example of airline profitability taking priority over community well being.”

Individual, User ID 119742

8.19.8. Other examples given to support the argument that incentives are not currently sufficient include:

- the roll out of RNAV technology and associated increased concentration of flight paths;
- that night noise regime improvements were brought about by the Department for Transport rather than industry; and
- the lack of health impact research carried out by airports to date.

Need stricter regulation

8.19.9. Some respondents do not consider the current framework and proposals to be strong enough to incentivise industry. They believe that penalties and rewards, backed up by legislative changes, must be introduced to achieve substantial change in noise impact.

“The only real incentive for the industry to go beyond that is the weight of public expectation and protest. That is no substitute for proper, responsible, regulation of the industry by the Government or an empowered regulator.”

Community group, User ID 122109

Include non-noise factors

8.19.10. A few respondents say that industry should be incentivised to address other factors besides noise. These include air quality, fuel burn and CO2 emissions, visual impact on landscapes, and any other harmful impacts. One respondent suggests incentivising industry to increase number of people travelling by public transport to the airport.

8.20. Suggested incentive mechanisms

8.20.1. Respondents provide comments on using fines, sanctions, regulations and rewards to incentivise noise management.

Fines and charges

8.20.2. Fines and/or additional charges are seen as essential by some respondents, to ensure the cost of noise reduction is shared across customers and the aviation industry. One respondent believes this would be a progressive approach and cites road congestion charges as a successful example.

8.20.3. A few respondents comment on how the money raised by fines should be used, with some expressing concern about a conflict of interest if airports receive the payments. One respondent suggests that fines could instead be paid to central government to cover some of the cost of ICCAN.

8.20.4. A few respondents comment specifically on landing charges, which are imposed by airports on airlines. Some are concerned that these are not always implemented, particularly at night when airports have available space. Others would like to see the charge increased at night, or for noisier planes. A couple of respondents comment that these charges only influence airlines but have no impact on airport noise management.

8.20.5. Some respondents ask for the introduction of noise levies, or a noise reduction tax on each flight. One other suggestion is to fine airlines whose aircrafts do not ascend steeply enough, to counteract any profit they gain from such practices.

Sanctions

8.20.6. Some respondents ask for greater use of sanctions for non-compliance, in order to deter industry from bad noise management practice. Suggested measures include airports and airlines being made to stop operating temporarily or permanently, or having their flight allowance reduced if they do not reduce noise levels in a demonstrable way.

- 8.20.7. In a similar vein, some respondents suggest that having a licence to operate should be conditional on adherence to noise standards.
- 8.20.8. One community group says that an effective system is needed to be put in place which can monitor breaches to ensure inappropriate noise levels are punished.

Rewards

- 8.20.9. A few respondents suggest that industry is rewarded for good noise management practice, as a way to incentivise behaviour change. Suggestions include airports giving priority service to airlines who demonstrate good noise management practice, for example through reduced airport passenger duty or gate priority. One other suggestion is to improve recognition of good practice, by introducing a national scheme ranking airports on their noise management progress.

“Any incentive should be financial such as a reduction in regulatory charges depending on the level of best practice adopted.”

Business umbrella body, User ID 127456

- 8.20.10. One respondent refers to noise policies in other countries which it believes are better at incentivising noise management at an early stage.

Ban high-polluting aircraft

- 8.20.11. There is some support for regulations which incentivise reducing noise at source, by banning noisier aircraft. Respondents believe this would be the most effective way to incentivise the speedy development and use of quieter aircraft. Some comment that progress in this area to date has been slow and look to the Government to use regulation to speed up the process.

- 8.20.12. However, a few respondents do not consider reducing noise at source to be sufficient to bring noise levels down to an appropriate level. The adoption of quieter aircraft is seen as a long-term solution, and other solutions are requested in order to achieve change in the meantime.

Other suggestions

- 8.20.13. A few other suggestions are made for how to better incentivise industry, including: making airport operations directors personally accountable for repeated breaches of noise levels; higher levels of compensation for breaches (reported on in more detail in Chapter 5); and introduction of a ban on all night flights.

8.21. Role of ICCAN

- 8.21.1. The consultation question asks respondents to consider the role of ICCAN in driving up standards in noise management across the aviation sector. Comments made in

response to this question reflect those made in response to Question 3, which asks about the functions, structure and governance of ICCAN. For the most part, respondents support having an independent body providing an oversight role of noise management as a way to build community trust in industry. Respondents believe central oversight is necessary to ensure fairness and check that standards are being met.

- 8.21.2. Concerns about ICCAN's role centre on its ability to be independent, and its ability to bring about change without meaningful legislative powers and sanctioning ability. These views are covered in more detail in Chapter 7 of this report.

“As a result there are clear benefits that could be realised from the establishment of ICCAN, provided it is not dominated by the aviation industry and takes the views of communities into account in a meaningful way.”

Local authority, User ID 140886

8.22. Other comments

- 8.22.1. A few other comments are made in response to this question.
- 8.22.2. Some respondents take this opportunity to reiterate comments made earlier in the consultation, opposing the proposal to give greater control of noise management to airports. One respondent supports the caveat that power over noise controls could return to the Government if necessary in the future.
- 8.22.3. Others believe that the guidance needs to be clearer to ensure it is properly interpreted. Requests for clarity include: what sanctions are proposed in the event of non-compliance; what incentives are currently in place; a definition of 'right balance'; and a definition of noise envelopes.
- 8.22.4. A few respondents comment that communities should be involved in the process for deciding appropriate incentives mechanisms.
- 8.22.5. A few comments are made asking for more assessment of aviation impacts, including potential costs to health and wellbeing. It is felt these should be factored in to decisions about incentive mechanisms.

Chapter 9: Comments on the Draft Navigation Guidance

9.1. Introduction

9.1.1. Question 5 asks:

Please provide any comments on the Draft Air Navigation Guidance published alongside this consultation.

9.1.2. The Guidance reflects the proposals in this consultation and will be reviewed in light of the consultation outcomes. It includes statutory guidance to the CAA on its environmental duty in respect of air navigation functions, as well as details on the airspace change process and the roles and responsibilities of various agencies and organisations. The Guidance is also expected to be taken into consideration by the aviation industry.

9.1.3. Comments relating to the Guidance are reported on by chapter as outlined below, with an initial section reporting on comments on the Guidance as a whole. The sections relating to each chapter are structured according to the headings and areas within that chapter which respondents comment on.

- Chapter 1: Air Navigation Guidance to the CAA on the Government's environmental objectives
- Chapter 2: Airspace Change
- Chapter 3: Development and assessment of airspace change options
- Chapter 4: Management of aircraft noise
- Chapter 5: Specific navigational guidance
- Chapter 6: The role of Government in the Airspace Change Process

9.1.4. Question 5 received 216 responses. In addition, 16 respondents commented on question 5 in responses to other questions, or in responses which do not fit the structure of the consultation questionnaire. These comments have been coded using the same codes created for question 5 and are included in the analysis below.

9.1.5. When reading this chapter, it should be noted that as the Guidance reflects the proposals set out in the consultation document, comments on some areas of the Guidance relate to proposals mentioned within the consultation questions. As such, some of the issues covered in this chapter overlap with those discussed in other chapters of this report. The relevant chapters of the report are signposted in these instances, rather than repeat the discussion here. However, where it is clear that respondents submitted these comments in relation to the draft Guidance, they are summarised in this chapter.

9.2. Overall comments on the draft Guidance

Overall support

- 9.2.1. Many respondents express general support for the draft Guidance, saying that it is useful, brings greater clarity than previous Guidance and will support consistent decision-making. Respondents also support that it is aimed at a wider audience beyond the CAA. Some caveats are added to this support, including that it must be put into practice in order to be effective.
- 9.2.2. A couple of respondents express support for what they see as increased consideration of local circumstances throughout the Guidance. Others support the stronger focus on community involvement, believing that local communities should play a key part in airspace policy.

Overall opposition

- 9.2.3. Many respondents object to the guidance, raising a number of concerns in relation to how it would be applied and enforced. Some believe the Guidance would be ineffective due to a lack of legislative power, with too much control remaining in the hands of airports and insufficient protection for local residents. Some respondents believe the Guidance needs to be backed by legislation to be effective in balancing community and industry interests, with some suggesting noise levies, or fines and airport closure in cases of non-compliance.
- 9.2.4. Other concerns include the belief that the Guidance has been developed to increase airspace capacity rather than reducing noise impacts on communities, or to accommodate the proposals for a third runway at Heathrow. A few respondents object to aviation expansion and say that the Guidance should instead aim to reduce the number of flights, particularly to the busy airports. One respondent is concerned that the Guidance is written to suit large airports such as Heathrow, to the detriment of smaller, regional airports. Regarding the increased level of community involvement outlined in the Guidance, one small business asks whether communities are sufficiently equipped to comment on airspace design principles.

The title of the Guidance

- 9.2.5. One respondent suggests a new title reflecting the fact that the Guidance is for three separate entities: the CAA, sponsors of airspace changes and airlines. It suggests that chapter headings are also updated accordingly.

Annex B

- 9.2.6. One airport respondent comments on the glossary provided in Annex B, asking if ACP is an acronym for Airspace Change Process or Airspace Change Proposal.

Other comments and suggestions relating to the Guidance as a whole

- 9.2.7. A few respondents, including airports and statutory bodies, comment that the Guidance is unclear or needs greater clarity. Respondents believe greater clarity

would help all parties understand the processes and how they would be implemented.

“GAL considers that the draft Air Navigation Guidance could helpfully be made more specific and detailed in order to provide a clearer picture to all those engaged in airspace change about the processes to be followed.”

Airport, User ID 131399

- 9.2.8. A couple of respondents ask that the Guidance aligns with other policies, such as the Airports National Policy Statement and Airspace Policy, and is informed by the latest noise evidence.
- 9.2.9. A few respondents, including an air navigation provider and airports ask that the need to consider non-noise factors should be emphasised in the Guidance. Factors suggested include CO2 emissions, operational needs and benefits, economic benefits, and the cost implications to regional airports.
- 9.2.10. Respondents mention that this consultation may be premature as the Guidance may change once other relevant government aviation policies are revised and published over the next twelve months. For example, one respondent believes there will need to be a debate on whether the environmental objectives remain appropriate.
- 9.2.11. A small number of respondents point out omissions or request additions to the Guidance. Some request more information on the justification of current flight paths, acknowledgement of the impact on communities and a guarantee that current flight paths will be reviewed in light of the proposed changes. Others ask to see what impact the updated Guidance would have on current and future potential flightpaths.
- 9.2.12. Some respondents request that other considerations are included in the Guidance. These include:
- noise from planes still on the ground;
 - air pollution caused by transport to/from the airports and the impact of airport transport links on communities;
 - the risk to safety posed by drone use, particularly around Heathrow; and
 - the impact of aviation noise on the historic environment.
- One respondent asks that the need to consider operational requirements is emphasised, and another asks for more detail on how differences in opinions between communities and airports will be resolved by the CAA.
- 9.2.13. One respondent suggests that the Guidance should prioritise commercial air transport operations over other airspace users.

“Commercial air transport operations deserve and require a higher level of airspace protection and prioritisation to that of other airspace users and this should be reflected in future Government policy and guidance for airspace modernisation in the national interest.”

Other organisation, User ID 131303

9.2.14. Many respondents do not provide specific comments on the Guidance but ask that their comments to earlier questions in the consultation are applied to the draft Guidance.

9.3. Comments on the Introduction chapter

Comments on the Guidance objectives

- 9.3.1. Some respondents take this opportunity to comment on the Guidance objectives outlined in the Introduction chapter.
- 9.3.2. A few respondents, including local authorities and community groups as part of a co-ordinated response, comment that the objectives are biased to favour industry, and that the words ‘mitigate’ and ‘practicable and realistic’ need defining for the objectives to be clear.
- 9.3.3. Whilst one statutory body states support for the inclusion of the objective to ‘Emphasise the need that the environmental impact of aviation must be mitigated as much as practicable and realistic to do so, within the context of a balanced decision-making framework’, others believe the wording and ordering of this objective does not give environmental considerations sufficient priority.

“The objectives (page 6) put environmental factors at the bottom of the list, and caveated so as to convey low priority “the environmental impact or aviation must be mitigated as much as it practicable and realistic to do so, within the context of balanced decision making”

Statutory body, User ID 4959

9.3.4. One respondent suggests switching the second and fourth objectives to give environmental considerations greater priority.

Comments on the purpose and applicability of the Guidance

- 9.3.5. A few comments are made relating to the purpose and applicability of the Guidance:
- the suggestion that the first paragraph in the section is reworded to reflect that one, two or all of the operational objectives listed may need to be considered;
 - a request for clarification that Section 5 is statutory guidance, as opposed to general guidance in Section 6; and

- a suggested rewording of the second paragraph to reflect that the Guidance refers to more than just environmental objectives.

Other comments on the Introduction chapter

9.3.6. Other comments on the Introduction chapter are:

- a request that the Guidance refers to the ‘Duty of regard’ to National Parks in Section 62 of the Environment Act 1995, as the CAA is covered by Section 62 (2); and
- a suggested slight rewording of the second paragraph on page 5 to reflect that the reappraisal of airspace and noise policies had not been completed in time for the 2014 Air Navigation Guidance publication.

9.3.7. One statutory body suggests specific wording changes throughout the Guidance document. Its suggestions in relation to the Introduction chapter (besides those covered above) are to replace the word ‘design’ with ‘structure’ in the first paragraph on page 5, and replace the words ‘that a better and more’ with ‘an’ in the final paragraph of the Objectives of the Guidance section on page 6.

9.4. Comments on Chapter 1: Air Navigation Guidance to the CAA on the Government’s environmental objectives

9.4.1. Chapter 1 of the draft Guidance outlines the Government’s environmental objectives and the intended roles and responsibilities of different agencies and organisations. The environmental objectives are to:

- limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise as part of a policy of sharing benefits of noise reduction between communities and industry in support of sustainable development;
- reduce aviation fuel use and carbon emissions through encouraging the aviation industry to come forward with more innovative ways to deliver enhanced efficiencies; and
- minimise local air quality emissions and in particular ensure that the UK complies with its international obligations on air quality.

The environmental objectives

Reducing noise impact

9.4.2. Most respondents who comment on the environmental objectives refer to the first objective, which relates to noise impact reduction.

9.4.3. Many respondents believe that noise reduction should be the primary objective for decision-makers, due to the impact of aviation noise on communities. One wishes to

see a more ambitious objective: to aim to avoid any exposure to noise levels above those recommended by the World Health Organisation.

- 9.4.4. A few respondents worry that the objective as written would not lead to a reduction in the impact of noise, with concern that the phrase ‘in support of sustainable development’ will permit noise increases in the name of aviation growth. One respondent suggests that a better objective would be to limit the amount of harm done to communities. Some are concerned that an objective to limit the number of people affected could lead to the introduction of more concentrated flight paths, and they take this opportunity to voice their preference for dispersal and multiple routes instead.
- 9.4.5. Some respondents believe the objective to limit the number of people significantly affected is ambiguous, and suggest additional dimensions to include, such as: number of people newly exposed to noise, number of people benefiting from noise reductions or temporary respite, the distributional impacts across different locations, noise frequency and possibility for respite.
- 9.4.6. A couple of respondents argue that because the objective focuses on number of people, it is a social rather than an environmental objective.

Reducing aviation fuel use and carbon emissions

- 9.4.7. The second objective, to reduce aviation fuel use and carbon emissions, is considered by many respondents to be less important than noise reduction, particularly when the two objectives are in conflict. Respondents who mention it say that carbon emissions arising from noise mitigation techniques such as steeper take-offs and landings should be mitigated elsewhere, for example through charging VAT on fuel.
- 9.4.8. One respondent asks for more clarity as to how CO₂ calculations should be considered alongside community impacts. One other respondent is concerned that some aircraft are turning sooner than is safe to do so, in order to minimise fuel use and comply with dispersal requirements.

Minimising local air quality emissions

- 9.4.9. The few comments on this objective agree that air quality is an important consideration, including when considering single versus multiple routes. One respondent believes that any airport expansion will be in conflict with government air quality targets.

Other comments on the environmental objectives

- 9.4.10. Some respondents suggest that an objective is included to improve the environment or reduce the impact on the environment, rather than to simply mitigate impact. A few request that the objectives take into account the impact of noise on wildlife, as well as the need to protect tranquillity in nationally protected landscapes.
- 9.4.11. One airline asks that the economic and social benefits of aviation be given equal consideration to concerns about impacts on communities.

- 9.4.12. One community group objects to having to weigh up noise and air quality impact, and instead suggests that leisure aviation is controlled to make space for business aviation, thus leading to economic benefits.

"It is not unreasonable to consider how capacity for "leisure aviation" can be constrained in favour of capacity for the "business aviation" which the Government seeks to encourage for the greater good of UK plc, in a beneficial way."

Community group, User ID 5145

Comments on roles and responsibilities of the various agencies

- 9.4.13. A small number of respondents support the need for reviewing the distribution of responsibilities, and appreciate the clearer picture provided in the Guidance document. Most other comments relate to the roles of specific agencies, as set out below.

The Department for Transport (DfT)

- 9.4.14. There is some scepticism amongst respondents about the DfT's independence and its commitment to reducing noise impact. Concerns regarding its independence stem from respondents' experiences of the Heathrow third runway consultation, particularly attending consultation meetings where the DfT was perceived to be working too closely with Heathrow. This has led to a lack of trust from some respondents that the DfT would take community concerns seriously. Its commitment to reducing noise impact is called into question by some who feel the Guidance does not transfer enough decision-making power to communities, or enable sufficient regulation of the industry. Another respondent questions if the new Guidance is just to appease local communities rather than deliver a sustainable policy for aviation growth, citing their understanding that Brecon Beacons National Parks Authority was not consulted as evidence for this.
- 9.4.15. Another concern is that the DfT does not currently have sufficient information about noise impacts, particularly those caused by concentration of flight paths, to develop a robust policy. Some suggest that the DfT conducts a full assessment before bringing in any changes.
- 9.4.16. Despite this scepticism, there are other respondents who consider the DfT to be the only organisation suitable to oversee airspace change decisions, as they perceive it not to be subject to influence and can address issues that span wide geographical areas. A few respondents suggest the DfT should take a greater lead in the airspace change process, by providing clear guidance to all parties on expectations relating to dealing with the environmental impacts of aviation.
- 9.4.17. A couple of respondents mention that the DfT is subject to a statutory duty under Section 85 of the Countryside and Rights of Way 2000 to have regard to conserving and enhancing AONBs when making decisions.

Civil Aviation Authority (CAA)

9.4.18. The independence and effectiveness of the CAA is seriously questioned by many of those who comment on its role. Its funding by the aviation industry is seen to undermine its ability to act independently. Others say it is not sufficiently resourced to review airspace change processes, and that it is not proactive enough in its role as regulator. Perceived recent increases in aviation noise impact have also contributed to a lack of trust in its effectiveness.

“CAA is not tasked, concerned or resourced to deal with noise”

Individual, User ID 137686

- 9.4.19. These concerns lead some respondents to suggest that the CAA is reformed or replaced with a body with more regulatory powers and more resource.
- 9.4.20. Some respondents support the CAA’s role in the airspace change process as a way to balance industry interests, by working with ICCAN and local communities and providing stakeholder engagement guidance to sponsors. However one airport respondent seeks clarity on how differences in view between airports and local communities would be resolved by the CAA. Other specific suggestions for its role include that it should have ombudsman responsibilities, that it should ensure National Park Authorities are properly represented via the Airport Consultative Committees, and that it should support a swift transition from Area Navigation RNAV1 to Required Navigation Performance RNP1.
- 9.4.21. One respondent seeks confirmation that there will be an established process in which airspace trials will need to be approved by the CAA before they can progress.
- 9.4.22. A few respondents mention that the CAA is subject to a statutory duty under Section 85 of the Countryside and Rights of Way 2000 to have regard to conserving and enhancing AONBs when making decisions. Another respondent suggests that the description of the CAA’s role in the Guidance should be reworded, to better describe its role in the proposed tier 1 and tier 2 changes.

Industry organisations

9.4.23. Aviation industry organisations are referred to as being profit-driven, operating in their own best interests, and not expected to take into account community impact or concerns. Guidance that introduces a balance to these interests and does not leave final decision-making in the hands of airports is therefore welcomed by some respondents. Comments on specific measures are reported on under the relevant headings of this report.

Local authorities

9.4.24. A few comments are made about the role of local authorities. These include that they need more power, and to be more involved on behalf of residents. However there is

some concern that local authorities might be compromised by vested interest, with Luton given as an example where this might be a concern. One specific comment is that not enough consideration is given to neighbouring National Park Authorities, which a couple of respondents consider should be consulted as part of any airspace change process.

Independent Commission on Civil Aviation Noise (ICCAN)

9.4.25. A summary of ICCAN's responsibilities is not included in the draft Guidance, as this is currently being consulted on as part of this consultation. Comments on ICCAN's functions, structure and governance are summarised in Chapter 7 of this report. Any comments specific to this Guidance are covered later in this chapter of the report.

Airport Consultative Committees (ACCs)

9.4.26. One respondent says that ACCs do not have sufficient powers and this should be addressed in the Guidance.

Other suggestions relating to Chapter 1

9.4.27. Other suggestions provided in response to this chapter include:

- that environmental impacts should be checked by an independent body who visits the area, rather than relying on airports to make the assessment;
- that airspace use should be monitored to ensure each area is not overflowed by too many planes - one respondent suggests a map of disturbances per hour in different areas;
- that new modelling technology should be better incorporated into the Guidance to allow updates over time;
- that a new coastal airport is created to reduce overflight of populated areas and provide employment opportunities outside of London;
- that there should be one overarching complaints channel for members of the public to contact about aviation noise; and
- that the sections of the Guidance on PBN and the definition of altitude would be better placed elsewhere, either in Chapter 3, as a footnote or in the glossary.

9.5. Comments on Chapter 2: Airspace change

9.5.1. Chapter 2 of the draft Guidance sets out the guidance relating to the proposed airspace change process, including the three-tier structure and the process for each tier. The chapter also includes a section on replication of flightpaths.

Overall comments on the airspace change process

9.5.2. Some respondents express support for the proposed airspace change process, welcoming clearer guidance for stakeholders and an increased recognition of the

impact of noise on communities. A few respondents say that they find the proposed three-tier structure useful. However, one respondent objects to any changes which lead to increased airspace use.

- 9.5.3. Respondents hope that information about airspace modernisation and any future airspace change proposals will be widely publicised and consulted on. These comments tie in with respondents' support for more transparency and independent scrutiny. One respondent suggests consulting with everyone on the route of the proposed change, not just those near the airport. Contacting households with a leaflet by post is seen as an appropriate way to reach all those potentially affected. In terms of other stakeholders, one respondent believes local authorities should also input into the airspace change process.
- 9.5.4. The complexity of the airspace change process is mentioned, with respondents saying that the hierarchy of responsibility is unclear and difficult to access. One airport respondent draws on a recent experience of struggling to discuss the topic with communities and other stakeholders:

“Having recently undertaken a protracted Airspace Change Proposal, the most difficult part has been communicating a very complicated issue in plain language to those stakeholders, particularly local communities who are understandably anxious and frustrated in understanding the impacts.”

Airport, User ID 5170

- 9.5.5. One respondent suggests that a public-friendly summary of the proposals is produced to aid local communities in understanding and questioning the proposed changes.
- 9.5.6. A few respondents comment that the process should be quicker and/or simpler, with one community group suggesting that changes that mitigate noise in particular should be fast-tracked. One airport supports the proposal to keep the existing process for temporary airspace changes.
- 9.5.7. A few other specific suggestions are made about the airspace change process overall: that the process accommodates the fact that some airspace change proposals require a long timescale of 5-10 years; that the Guidance should include a process for monitoring airspace changes; and that airspace change should only go ahead if it contributes to community wellbeing.
- 9.5.8. A few respondents use this question to comment on the Altitude Based Priorities. These comments are reported on under the Altitude Based Priorities heading in section 9.6.4.
- 9.5.9. One respondent anticipates disagreements amongst stakeholders regarding tier categorisation for an airspace change proposal, given the different consultation requirements for each tier. The respondent therefore requests more clarity on tier definitions, particularly tier 2 and the tier 2/tier 3 boundary, and suggests using

examples of past airspace change cases and how they would be categorised as a way to do this. They also suggest that the Guidance covers how contested categorisations would be assessed and settled and the process of appeal for all parties.

9.5.10. One respondent suggests rewording for the tier structure descriptions, as they believe the definitions should be in the Directions rather than the Guidance.

Tier 1 proposals

9.5.11. Respondents put forward a number of specific comments on the tier 1 Guidance, including:

- that all airspace changes (including temporary changes) should require community consultation with those impacted;
- that the Guidance manages expectations regarding consultation on tier 1 changes;
- that smaller airports are not sufficiently resourced to follow the full tier 1a process - with a request that allowances are made in such cases;
- that airspace changes of strategic national importance should be prioritised over other airspace changes or existing patterns of usage, with concern that the SofS intervention comes at too late a stage to facilitate this in the current proposals;
- that webTAG is not sufficiently sensitive to assess impacts for the high level changes, with a request that the Guidance does not raise expectations that it will always be used for tier 1 changes;
- that the section on the need for options appraisal by airspace change sponsors from Chapter 3 of the draft Guidance should be included with the tier 1a description;

9.5.12. Some respondents also suggest a number of specific changes to the wording of the document, including adding a sentence to the tier 1c description to make clear that noise impact is the only environmental impact considered for live operational trials, if this is the case. Another respondent suggests adding a note to explain that tier 1 changes would require an Aeronautical Information Publication (AIP) update to implement the proposed change, but that not all AIPs would represent a tier 1 airspace change. Another adds suggested wording for an additional section on changes.

Tier 2 proposals

9.5.13. A small number of comments are received on the tier 2 Guidance. A couple of respondents seek a more thorough process for tier 2 as the resulting impacts could be similar to tier 1 changes. Suggestions include increased community consultation or an extension of the call-in function to also cover tier 2.

- 9.5.14. One respondent refers specifically to the provisions for vectoring set out in the tier 2 section of the Guidance. It questions the industry's ability to conduct sensitive vectoring given its understanding that NATS radar screens do not indicate areas of high population density.
- 9.5.15. Similar to its tier 1 concerns, one respondent asks that expectations are managed with respect to webTAG use below 4,000ft. It also comments that it is not clear what is meant by 'defined noise impact' in paragraph 2.17. One respondent seeks clarity on how the CAA should define the 'redistribution of aircraft tracks', and whether consultation is required for changes which redistribute aircraft tracks below 7,000ft.

Tier 3 proposals

- 9.5.16. One airport supports the proposal that tier 3 changes to air operations do not need specific CAA approval, however other respondents believe such changes could still result in significant community impact and therefore should require consultation and CAA approval.
- 9.5.17. Other comments include:
- a request for clarity on the process when a series of linked tier 3-level changes that, when considered together, could be viewed as tier 2;
 - a request that the Guidance makes clear the limits of community involvement in tier 3;
 - a suggestion that the CAA sets out good practice on informing communities about a proposed airspace change;
 - and a comment that measuring noise levels, changing tracks and avoiding inhabited areas in rural environments may be difficult for helicopters involved in offshore operations, particularly at night.

Replication of flight paths

- 9.5.18. A few airports comment on this section.
- 9.5.19. One objects to the following sentence of the Guidance: "The Government expects that the full CAA airspace change process will be followed by airspace change sponsors wishing to update their conventional flightpaths to PBN standards." It suggests that the full airspace change process should not be required if the CAA agrees that the PBN standard replicates existing procedures. Another seeks more detail from the Guidance on what factors to assess, and how they should be weighed to reach a decision when considering replicating flightpaths with new PBN-based procedures. One airport supports the draft paragraph but believes it could be written more simply.
- 9.5.20. A small business considers the proposed replication process to be laborious and off-putting for airports, and suggests that the process should be streamlined to encourage adoption of PBN procedures. One statutory body suggests that this section of the Guidance would be more appropriately placed in Chapter 3 of the Guidance.

9.6. Comments on Chapter 3: Development and assessment of airspace change options

9.6.1. Chapter 3 of the draft Guidance details the requirements for engaging communities in the change process and assessing the impacts associated with different options. The chapter covers altitude-based priorities, the options appraisal process, the noise impact assessment process, greenhouse gases, local air quality, Environmental Statements, the role of ICCAN and other relevant legislation, policy and guidance.

9.6.2. The nature of the topics covered in Chapter 3 and Chapter 4 of the Guidance, which relates to the management of aircraft noise, means it is not always clear which section of the Guidance respondents are referring to. For the sake of simplicity, the majority of comments relating to noise impact assessment and the options analysis process are covered in this section. The next section covers comments on helicopters and light aircraft, National Parks and AONBs and noise sensitive buildings only.

Overall comments on Chapter 3

9.6.3. A few comments are made relating to the chapter as a whole, mainly in support of the proposals. However a couple respondents question whether the proposals are truly intended to reduce noise impact on communities.

Altitude Based Priorities

9.6.4. There are a few comments in support of the continued use of the altitude based priorities, with one respondent expressing specific support for the proposal that AONBs should be avoided where possible below 7,000ft.

9.6.5. Some respondents, including an airport, express support for the proposal that elevation of the land is factored in, particularly over AONBs and National Parks. However, there is concern that this requirement is not made clear throughout the Guidance. In fact, a few respondents oppose the altitude-based priorities as they believe they do not take elevation of land into account. Some respondents suggest that the requirement to factor in ground level is repeated throughout the Guidance to make this clearer.

“The reference to actual height above ground in paragraph 1.6 is welcomed and we would like to see repeated references throughout the guidance”

Individual, User ID 5110

9.6.6. A few concerns are raised that insufficient priority is given to AONBs and National Parks, based on their position in the list of bullet points and the caveats surrounding their consideration. There is a concern that the proposed wording effectively amounts to no protection for these areas.

- 9.6.7. Many respondents, including local authorities and community groups, believe noise should be prioritised up to 7,000ft. They consider noise to be disruptive up to this altitude, particularly in light of new PBN technology, and refer to reports and personal experience of recent PBN trials to support this point. There is a concern that not prioritising noise to this level will lead to many communities being newly exposed to noise impacts. Some go on to request that any changes below 7000ft must therefore involve consultation with local communities and other stakeholders.
- 9.6.8. For similar reasons, other respondents say that noise should be considered above 7,000ft. Some respondents consider noise to have a significant impact above this level, particularly in rural areas and/or if flight frequency is increased, and are concerned that potential community impacts would therefore not be factored in to airspace change decisions. The evidence underpinning this boundary is called into question or said to be lacking, and some respondents refer to other parts of the Guidance which contradict this boundary such as the documents listed in the ‘Other relevant legislation, policy and guidance’ section.
- 9.6.9. Some respondents consider the altitude based priorities to be too simplistic to adequately assess noise impact, and that there is not sufficient evidence to support their use. Respondents say that in order to provide a more meaningful assessment and promote transparency, other factors should be considered to assess noise, including: noise metrics such as LOAEL and SOAEL, aircraft type, departure and landing routes (as opposed to just ‘tracks on the ground’), the impact on urban vs rural areas, and impact on habitats and species.

“However, we believe that the height based criteria (including 4000ft) is too simplistic and needs to be clarified and supplemented with noise based criteria (e.g. LOAEL, SOAEL) to provide more meaningful assessments of impacts We believe the addition of noise metrics as indicators in enacting the altitude based priorities, would help promote greater transparency in decision making and should be incorporated within an options scoring matrix for an airspace change proposal”

Airport, User ID 4882

- 9.6.10. There are a few requests for clarification regarding the altitude based priorities, including:
- how impacts above 51dB LAeq and 45dB LAeq are expected to be determined and portrayed;
 - whether they are intended to encourage reducing the number of people newly affected by aviation noise;
 - what is meant by the phrase ‘prioritising noise’ and how can this be assessed and demonstrated; and

- what constitutes an ‘appropriate’ community consultation/engagement as outlined in the final bullet point.

9.6.11. One respondent suggests including a table showing the priorities and how they should be reflected by the CAA in their associated processes. The layout and text for this table is included in their response.

9.6.12. There are a few other specific comments and suggestions received on the priorities, including:

- the inclusion of a bullet point that air quality is only considered an issue below 1,000ft;
- a rewording of the first bullet point to ensure consistent wording with elsewhere in the Guidance, including paragraph 1.2;
- that there is a lack of clarity on how communities should be consulted between 4,000ft and 7,000ft;
- a suggestion to switch priorities so that minimising overflight of AONBs and National Parks is prioritised between 4,000ft and 7,000ft, with reducing fuel burn taking precedence above 7,000ft;
- that there is a discrepancy between the first and third bullet points, saying the third should also refer to 45dB LNight rather than just 51dB Leq 16 hr;
- a request that the phrase ‘on populated areas’ is taken out of the third bullet point, and
- a request to require airports to outline their plans to minimise noise impact up to 7,000ft in their noise action plans.

The noise impact assessment process

9.6.13. Respondents raise concerns that the noise metrics suggested do not sufficiently reflect the impact of noise on communities and protected areas, and that therefore future airspace changes may cause more annoyance than predicted. There is some support for particular proposals, such as the replacement of 57dB LAeq with a lower metric, the use of 51dB LAeq for day and 45dB LAeq for night, and the use of n65 in daytime and n60 at night, however a few respondents comment that levels should be more aligned with WHO recommendations, for example 50dB LAeq for daytime and 40dB LAeq for night. A few respondents question the use of averaging with more detailed, on-the-ground assessment being requested, and the overflight hypothesis referred to in the Guidance is also challenged.

9.6.14. WebTAG use is challenged by some respondents, including statutory bodies, airports and an air navigation provider. Concerns include:

- that it is too onerous for small airports;
- that it is not sufficiently sensitive for all high-level changes;
- that it does not factor in impacts on wildlife; and

- that its assessment may not align with community feedback.

9.6.15. Other comments include:

- whether having specific noise levels is useful, as opposed to having levels set locally by ICCAN;
- concern that lowering noise standards will deter air navigation service providers from modernising airspace due to the perceived increased resource and risk involved in increased community involvement;
- requests for clarity about the term ‘significantly affected’ with a call to ensure consistency with wider noise policy;
- a recommendation of a new noise impact assessment methodology for assessing the impact of noise on heritage assets;
- a request for more detail on use of SOAEL metrics in line with other transport sector projects;
- a suggestion to include the rationale which led to the proposed noise impact levels;
- a suggested paragraph to include relating to consideration of communities further away from airports, including number of overflights; and
- a request for clarity regarding reporting of night noise levels.

The Options Analysis process

9.6.16. Respondents take this opportunity to provide general comments on the proposed option appraisal process. A few respondents support the proposed options analysis approach, particularly increased community involvement and local consideration, saying it will promote transparency and ensure a more thorough and robust process. Some request that the process is used on existing routes to achieve an outcome with less noise impact.

9.6.17. Other comments include:

- concern that the principle of flying over ‘fewer people’ is too simplistic;
- various preferences for which areas should be avoided such as populated areas, rural areas, previously unaffected areas, and areas where vulnerable people live;
- general support for dispersion over concentration;
- and the belief that the process must be fair, prioritise least community impact and/or overall noise reduction.

9.6.18. Issues, concerns and suggestions relating to this process are reported on in more detail in Chapter 6. A few comments specific to the draft Guidance are made, particularly by airports. These include:

- the suggestion that minimising noise in rural areas should be emphasised more in the Guidance;
- a query about what is meant by the phrase ‘that impacts on wider airspace use are also considered’ in paragraph 3.19;
- concern that the phrase *‘sponsors should demonstrate that they have taken on board the views of communities where possible when developing options’* will over-prioritise noise and does not consider the possibility that communities may not agree amongst themselves on one option; and
- concern that the new process may be too complicated, particularly during the transition period from RNAV1 to RNP1 when a separate analysis may be required for each procedure.

Greenhouse gases

- 9.6.19. A couple of respondents comment on greenhouse gases, saying that they should be considered alongside noise and air quality, and provide some suggested rewording of the relevant section in the Guidance.

Local air quality

- 9.6.20. A few respondents are concerned that this section does not factor in the impact of nitrogen oxides and particulates on human health and the environment, with two referencing a Plantlife report on the impact on wild flowers and other fauna. One respondent questions the feasibility of the request for airspace change sponsors to *‘provide a comparison of local air quality as part of their submission to the CAA’*, as they say that no baseline currently exists to allow a comparison of future impacts to take place.

“The issue for most airports is that there is no baseline to compare to as there is currently no requirement for all airports to monitor local air quality. How would a comparison of local air quality be produced without any historic data.”

Airport, User ID 4381

Environmental Statement

- 9.6.21. Points raised in relation to the Environmental Statement guidance are:
- that the requirement for an Environmental Statement to accompany the airspace change process is welcomed but that what is described is light-touch, particularly regarding the consideration of AONBs and in comparison to other infrastructure types;
 - and that the CAA already produces such a statement for airspace change decisions.

The role of ICCAN in the airspace change process

- 9.6.22. Many of the points made relating to the role of ICCAN are covered in more detail in Chapter 7 of this report.
- 9.6.23. A few specific references are made to the description of ICCAN's role provided in the Guidance.
- 9.6.24. One respondent requests clarity on the sentence "*Sponsors should demonstrate ICCAN's best practice has been considered in arriving at design principles*", specifically how community groups should be involved in developing the design principles, and whether local circumstances should take priority over consistency across airports or across airspace change processes. One respondent is concerned that ICCAN will not have the capacity to work with change sponsors to develop local design principles.
- 9.6.25. Whilst a couple of respondents support ICCAN's involvement in compensation-setting, one airport is concerned that comparing compensation schemes across the country would disrupt local compensation schemes which at the moment it considers to be working effectively.
- 9.6.26. Regarding ICCAN involvement in airspace change processes, one airport is concerned that this could delay the process if ICCAN does not have the resource to consider every airspace change. It asks therefore that ICCAN involvement is not a pre-requisite for the CAA to proceed with airspace change decision-making.
- 9.6.27. A few respondents ask that ICCAN is involved in setting appropriate noise metrics, with some suggesting that these could differ according to local circumstances. One other suggestion is that ICCAN should develop an action plan for reducing aviation air pollution.
- 9.6.28. One respondent suggests rewording this section so that it reflects only how the CAA and others are required to work with ICCAN, rather than what ICCAN itself will do. It also comments that the way ICCAN's functions and powers interact with those of the CAA should be reflected in the Directions. It seeks confirmation that ICCAN will not have a function to consider disputes between the CAA and stakeholders that do not agree with a CAA decision. It asks for confirmation that ICCAN would not have a role in temporary changes or trials, and suggests including details of what would happen where changes are sponsored by the military.

Comments on other relevant legislation, policy and guidance

- 9.6.29. A small number of comments are put forward regarding the list of other relevant legislation, policy and guidance:
- support for the inclusion of the National Planning Policy Framework;
 - a suggestion that the Environment Act 1995, Section 62(2) Duty of Regards and the Defra guidance note should be included;
 - a suggestion that methodology and research on noise impacts on the historic environment should be included; and

- a suggestion that the CAA and ICCAN should also look at guidance on how best to assess aircraft noise and represent its impact.

9.7. Comments on Chapter 4: Management of aircraft noise

9.7.1. Chapter 4 of the draft Guidance sets out guidance in relation to management of aircraft noise. As mentioned in the Chapter 3 reporting section, most comments relating to airspace management and control are reported on in the previous section, due to overlap of topics in each chapter. This section summarises comments relating to the guidance on National Parks and AONBs, on helicopter and light-aircraft, and on noise sensitive buildings.

Overall comments on Chapter 4

9.7.2. Whilst a few respondents are satisfied with Chapter 4, some express concerns about the chapter overall. Comments centre around the feeling that the guidance on noise management, whilst aspirational, would not make any real difference on noise impact experienced by communities due to too much control being in the hands of airports. Respondents believe this means the Guidance is unbalanced and would lead to reduce respite and increased noise impact for communities around airports.

National Parks and Areas of Outstanding Natural Beauty (AONBs)

9.7.3. Some respondents comment on the section of the Guidance covering National Parks and AONBs, as well as the following bullet point in the section of the Guidance on Altitude Based Priorities: *“where practicable, it is desirable that airspace routes below 7,000 feet should seek to avoid flying over Areas of Outstanding Natural Beauty (AONB) and National Parks.”*

9.7.4. A few respondents support the proposals relating to National Parks and AONBs in the Guidance, including the emphasis on maintaining tranquillity in these areas and the principle of avoiding AONBs where possible.

9.7.5. However, most who comment believe National Parks and AONBs have been given insufficient consideration in the Guidance. Respondents emphasise the value of tranquillity in these areas to wellbeing, recreation and amenity, which some feel is already being eroded by recent increases in flights. There is concern that these benefits are not factored in to webTAG, and that caveats such as ‘where possible’ and ‘where practicable’ around the protection of National Parks and AONBs would give airspace change sponsors the opportunity to ignore impacts on these areas. One concern is also raised about the harm caused to various plant species in the Chilterns AONB by aviation air pollution. Respondents suggest that minimising AONB overflight is protected up to and beyond 7,000ft, particularly as hills in protected areas are seen to be the quietest points.

9.7.6. In contrast, one respondent comments that the needs of communities should be prioritised over AONBs where there is no other option.

9.7.7. Other comments include:

- concern that National Park Authorities are not sufficiently included in airspace change decision-making brought forward by neighbouring airports;
- reference to guidance in the National Planning Policy Framework which says that areas such as Royal Parks should be given similar consideration to AONBs; and
- suggestion to include a list of National Parks and AONBs in the Guidance.

Helicopter and light aircraft-related noise

9.7.8. A couple of organisations welcome the reference to helicopters and light aircraft. One local authority refers specifically to New Forest National Park where noise impact from recreational flights and helicopter access to nearby hotels is seen to be impacting on local residents. The local authority believes that current guidance is not being followed and hopes to see increased regulation and more local stakeholder cooperation to resolve the issue. An environment group also asks for clarity on how privately owned helicopters and aerobatic training flights would be controlled.

Noise Sensitive Buildings

- 9.7.9. A respondent asks that heritage assets are included in the list of noise-sensitive building types, both due to the small risk that resonance may have a physical impact on the building and the impact of noise on the setting of the asset.
- 9.7.10. Other comments specifically relating to noise sensitive buildings include that the list of building types should include schools and care homes, and that the number of people using the building and the time spent there should be factored in to assess sensitivity.

Other suggestions relating to Chapter 4

- 9.7.11. A few other suggestions are made in response to this chapter on aircraft noise management, including:
- that a body should monitor airspace and act on behalf of the public if flight frequency or noise levels increase beyond acceptable levels;
 - that this body should be supported by an independent technical specialist, and should be able to introduce penalties for airlines that do not comply with noise reduction measures; and
 - that the section on airspace design should be moved to earlier in the Guidance as it relates to the airspace change process.

9.8. Comments on Chapter 5: Specific navigational guidance

9.8.1. This Chapter of the draft Guidance outlines specific navigational guidance on departure and arrival procedures, including continuous climb operations and

continuous descent operations. It also provides guidance on the use of Noise Preferential Routes (NPRs) and the publication of route information.

Overall comments on Chapter 5

- 9.8.2. A few general comments are made on the chapter, including some overall agreement but also some concern that the measures covered in this chapter would not provide any significant reduction to noise impact for communities unless measures such as fines for straying off agreed routes are introduced.

Departure procedures

- 9.8.3. A few respondents support using steeper climb gradients so that planes fly at the highest possible altitude above communities. One respondent believes that fuel efficiency and engine wear currently takes precedence when departure procedures are agreed, and asks that reducing noise impact is given greater priority. One respondent suggests that ICCAN plays a regulatory role when it comes to departure procedures.

Continuous Climb Operations

- 9.8.4. The proposal to accelerate widespread adoption of Continuous Climb Operations (CCO) is welcomed by most respondents who comment, as altitude is seen as an important factor in noise impact. One respondent speaks favourably of airlines that already practice CCO, and another considers the potential reduction in fuel efficiency to be worth the reduced noise impact.
- 9.8.5. Whilst most community groups support its introduction, one group questions whether it will help reduce noise, believing instead that the main purpose of its introduction is fuel efficiency. It suggests that using a lower throttle setting after take-off would be a better way to reduce noise.
- 9.8.6. One community group questions whether it will be possible to realise the proposals to increase CCO use in and around London, citing delays with the London Airspace Management Project as an example of where implementation has been difficult.

Arrival procedures

- 9.8.7. One respondent agrees with the Guidance's statement that arrival noise is potentially more serious than departure noise, and with the list of factors that determine the level and distribution of noise from landing aircraft. One respondent points out that the final approach (from eight to ten miles out) must always follow the same route, however another respondent suggests that at least the approach to this point should be varied.

Continuous Descent Operations

- 9.8.8. One respondent agrees that Continuous Descent Operations (CDOs) can play an important role in reducing noise impact and provides a few specific comments relating to its implementation. It suggests that overscheduling of flights and use of stacks should be discouraged as this prevents CDO from being implemented

effectively. It also believes that aircraft should start higher than the 6,000ft proposed in the Guidance and descend as steeply as safety and comfort will allow, using low power and drag procedures to minimise engine and aircraft noise.

Navigational accuracy

9.8.9. No specific comments are made relating to the Navigational accuracy section.

Noise Preferential Routes (NPRs)

9.8.10. A few respondents comment on the proposal in the Guidance that NPRs no longer need to be implemented or retained, if it is not considered an appropriate local solution. There is some support for this proposal, with a couple of respondents saying that NPRs need reviewing to factor in community input or to allow more suitable departure procedures to be used. However, others believe NPRs play an important role in allowing communities to monitor aviation noise, especially as communities are now familiar with the routes. They therefore oppose the relaxation of NPR use as proposed in the Guidance.

9.8.11. One respondent asks how this Guidance will affect those who have voluntary Section 106 NPRs.

Route information Guidance

9.8.12. Some respondents, mostly individuals and community groups, support the publication of aircraft track keeping and noise performance as a way to improve transparency and build community trust, with another believing it will encourage airline compliance. Some suggestions are made, including that the data is publicly accessible, that it should cover areas beyond the immediate vicinity of airports, and that designated airports should have to report every five years on specific changes to reduce noise.

9.8.13. A few concerns are raised by airports:

- that requesting data on the average distance from the SID centreline puts too much expectation on aircraft following that line exactly, which is unrealistic;
- that it is unclear how noise levels in different areas will be calculated; and
- that the publication requirements are too burdensome on smaller airports that do not currently publish routes.

Quieter aircraft

9.8.14. A few respondents mention quieter aircraft technology in their response to this chapter. They consider this to be an effective way to reduce aircraft noise, and call for legislation which incentivises accelerated research into such technology and deployment of the outputs.

9.8.15. One respondent comments that the Guidance should make provisions for developments in electric plane technology.

Other comments and concerns in response to Chapter 5

- 9.8.16. A couple of other comments are made, both concerning respondents' own situations. One warns that new technology may not bring community benefit, referring to recent flight path changes by Luton Airport which has affected where they live in St Albans. Another respondent asks what would happen with plans for a 'river route' and how that ties in with proposals for a new runway at Heathrow.

9.9. Comments on Chapter 6: The role of Government in the Airspace Change Process

- 9.9.1. This chapter sets out the role of Government in the airspace change process, including the criteria and process for Secretary of State call-in.

Overall comments on Chapter 6

- 9.9.2. Respondents offer a range of views regarding the role of Government in the airspace change process. Some support the Government playing a major decision-making and oversight role, where they represent communities and provide a balance to the economic priorities of airports and airlines. Some respondents do not feel that the needs of the public and the environment are being sufficiently represented at the moment, with specific concerns that MPs currently do not always act in the interest of the wider community they represent, or that local authorities may have conflicted interests when it comes to airport expansion. Some of these respondents believe the Government needs more power and should take complete ownership of the process.
- 9.9.3. However there is some scepticism regarding Government involvement, with respondents referring to negative experiences in the past and questioning the Government's motivation for real change through this consultation. One respondent believes the Government should not be involved at all, whilst another states the role should only be to set policy, which others then follow.

Criteria for call-in

- 9.9.4. There is support for the proposed call-in criteria from a couple of airports, whilst some individuals, one community group and one local authority object to the proposals. The main concern amongst those who comment is the final criterion which relates to noise impact, with respondents considering the requirement to prove health impact on 10,000 people as unfair.
- 9.9.5. Other comments include:
- a request for clarity of what makes a proposal necessary for call-in, especially when the change is of strategic national importance;
 - that an additional criterion should be added to prompt a call-in when an aerodrome would close if an airspace change cannot be introduced;
 - a suggestion that standard runway usage contours are required instead of 100% LAeq contours, to reduce the assessment burden on sponsors;

- and the suggestion that the call-in function should cover tier 2 as well, as the policy framework notes that the impact from tier 1 and tier 2 could be the same.

Process for handling call-ins

- 9.9.6. One respondent asks that the call-in process is time-limited, in recognition of the resources required for a large airspace change.
- 9.9.7. Another respondent seeks confirmation that the SofS will review proposals and direct the CAA on what decision to take, rather than taking the decision on their own. It also says that the Guidance needs to make clearer whether the call-in function applies to tier 1 changes only, or also to tier 2.
- 9.9.8. Two respondents make a specific comment relating to the learning from Englefield Green, suggesting that formal agreement from residents should be required before change can be progressed.

Chapter 10: Additional comments on airspace policy

10.1. Introduction

10.1.1. Many additional comments were made in response to the consultation, which do not fall within any of the question themes. These comments can be broadly summarised into four main categories:

- comments on the proposals overall;
- comments on airspace policy and the modernisation of airspace in general;
- comments on the impacts of air travel; and
- comments and suggestions regarding the mitigation of the impacts of air travel.

10.2. Comments on the proposals overall

10.2.1. Comments on the proposals covered by specific consultation questions are summarised under the chapter of this report corresponding to the relevant question. However, respondents often comment on the proposals overall, without referencing a specific section of the consultation document.

Concerns

10.2.2. Many respondents question the enforceability of the proposals, saying that they rely on a self-regulated industry for their implementation. Respondents argue that past efforts by the Government have not produced sufficient change in practice, at least from the point of view of communities. There is therefore a general view that firmer regulations are required, especially around noise and enforcement of changes.

“The proposals put forward in this consultation are largely unenforceable by the local decision making process suggested, nor do we think the newly proposed overseeing body (ICCAN) will fare any better without the power to see that its advice and decisions are followed through; meanwhile the CAA is perceived by communities as too much a creature of the industry, and we see little in the current proposals which will change this.”

Community group, User ID 131269

10.2.3. Some respondents criticise the policies in the consultation document as placing too much emphasis on noise and asking for more consideration to be taken of other factors, including carbon emissions, air quality, environmental concerns, safety, airspace violations, operational efficiency, fuel consumption and economic needs.

10.2.4. Some respondents draw attention to possible problems caused by potential clashes between the present proposals and international safety and interoperability protocols, as well as recent airspace changes proposed by the CAA. Other respondents comment that the sum total of the changes being proposed would lead to significant increases in the time taken and the workload required to make airspace changes.

Suggestions

10.2.5. A few respondents call for a more co-ordinated system for how airspace is designed and changes implemented, stressing how lengthy and bureaucratic the current decision-making process is. Other requests include fairness, transparency, balance, robustness, consistency and accountability.

10.2.6. A small number of respondents comment on the transition from the current airspace regime to the one proposed in the consultation, stressing the importance of clarity and certainty.

10.2.7. A few respondents make specific comments and suggestions regarding air traffic routing and procedures near various airports, including London Gatwick, Luton, City and Aberdeen.

10.3. Airspace policy and the modernisation of airspace

Support for airspace changes and airspace modernisation

10.3.1. The majority of comments made in support of airspace modernisation are from airports, airlines, businesses, business umbrella bodies and statutory bodies, with a few local authorities also expressing similar views. The most-cited reasons focus on increased efficiency, reduction of noise pollution and carbon emissions and improved safety. These are all discussed in turn below.

Increased efficiency

10.3.2. A few respondents argue that improved practices would remove constraints in air traffic movements, thereby reducing delays and resulting in a more efficient and 'joined up' system. Some go on to comment that this would enable the number of flights to grow, which would benefit both the economy and passengers. Some respondents specifically request growth and modernisation to be prioritised in airspace policy.

“We are confident that Airspace modernisation will benefit the economy, through faster journeys and dramatically reducing the risk of future delays as a result of increased capacity in the sky.”

Airport, User ID 137699

Reduction of noise

- 10.3.3. Some respondents, including airports, business umbrella bodies, local authorities and statutory bodies, associate more modern airspace practices with reduced noise levels, though very few elaborate on the link between the two. Those who do, suggest that improved airspace practices would lead to efficiency gains, such as reduced use of stacking, therefore reducing noise on the ground. In contrast, some respondents, particularly community groups and individuals, are concerned that the increased capacity provided by the airspace modernisation would lead to an increase in noise.

“In the near term, airspace modernisation could help deliver improved flight efficiency and noise respite benefits to affected communities, sooner than is feasible under current regulatory procedures.”

Airport, User ID 131399

Reduction of carbon emissions

- 10.3.4. A few business umbrella bodies cite studies which predict percentage fall in carbon emissions as a result of more modern practices.

Safety

- 10.3.5. A few respondents express support on the basis of improved safety, without specifying further.
- 10.3.6. One respondent expresses support of airspace modernisation practices, but not if they are used to increase airspace capacity.
- Challenges to airspace changes and airspace modernisation
- 10.3.7. Often referring to previous airspace changes and actions by the CAA, a few respondents, particularly community groups and individuals, suggest that airspace modernisation favours the industry at the expense of affected communities and call for this to be addressed.
- 10.3.8. A few respondents object to airspace modernisation because they associate it either with concentration of flight paths (see Chapter 6 of this report) or the expansion of airspace capacity (i.e. a greater number of flights). In the context of opposition to both of these outcomes, a small number of respondents comment that they do not believe the need case for airspace modernisation has been sufficiently explained and presented.

Comments regarding the CAA

- 10.3.9. As discussed in other parts of this report, many respondents are critical of the CAA. The organisation is often described as being unaccountable, lacking transparency and being biased towards the aviation industry. Some respondents add that the CAA has made changes without warning or consulting local communities and that they pay little attention to their concerns. One respondent describes the organisation as being

internally ‘conflicted’, as it tries to balance the demands of different private and public bodies - some of which they consider to be mutually exclusive.

- 10.3.10. In light of this, some respondents call for the CAA to be more accountable and transparent, both in its decision-making process and in how it deals with issues and complaints.
- 10.3.11. A few respondents argue that current powers of the CAA are too limited and call for these to be increased. Specific suggestions include giving it the power of ombudsman over airports and their owners; and giving it greater power over Airport Consultative Committees.

Other comments on airspace modernisation

- 10.3.12. One airport argues that airspace modernisation should be informed by strategic planning, in order to minimise impacts on communities and ensure that benefits in terms of jobs and growth are shared across different regions.
- 10.3.13. With reference to the DfT document ‘Upgrading UK Airspace - Strategic Rationale’, one respondent argues that sustainable growth in demand for air travel has been overestimated, and that the growth restraints created by carbon emissions, air pollution and noise (with associated impacts on health and quality of life) are underestimated. They also note a discrepancy between the NATS figure showing air travel growing to 3.25 million flights per year in 2030 and the figure of 2.5 million flights given by the Airports Commission, suggesting that these estimates need to be reconciled. Finally, the same respondent also criticises the Government’s decision to delay its publication of demand estimates for the UK until after the current consultations on Airspace Policy and the Draft Airports National Policy Statement.

10.4. The impacts of air travel

- 10.4.1. Many respondents refer to the noise and air pollution impacts of aviation in their responses. Where these comments are made in relation to the proposals mentioned in any of the consultation questions, they are summarised in the corresponding chapter of this report. Comments on the impacts associated with aircraft more generally are reported here.

Noise

- 10.4.2. Respondents frequently comment on the current noise levels generated by air travel (and its associated activities), with many complaining about the effect those have on their health, quality of sleep and property values. A few respondents express a particular concern for the impact on children, both in terms of sleep quality and academic performance.
- 10.4.3. A few respondents express concerns regarding the cumulative effect of aircraft noise, saying that even when they are receiving respite from one London airport, they are

still being overflowed by another, due to a perceived lack of coordination of respite practices.

Air pollution

10.4.4. The issue of air pollution and its impact on both people and the environment is raised by many respondents. Most of them comment that current air quality targets are not being met and are concerned that increased air travel would exacerbate the problem even further. In the context of their concerns, some call for air quality mitigation measures to be prioritised. A few respondents express concern about the potential impact of Brexit on air quality targets.

10.4.5. A few respondents link the air pollution produced by air travel to health problems, such as asthma, lung disease and shortened life expectancy. As with noise, children are considered to be particularly vulnerable. The additional cost of these problems to the NHS is also commented on.

10.5. Mitigation of the impacts of air travel

10.5.1. Many respondents make comments and suggestions about how to mitigate the potential impacts of air travel. Comments made exclusively with regard to possible expansion of capacity in the South East of England are reported under Chapter 11.

Improved aircraft

10.5.2. Some respondents support the introduction of more fuel-efficient aircraft, with a few pointing out the improvements made in this field in recent years. To further encourage the development of cleaner aircraft technology, respondents call for legally or financially enforceable limits on aircraft emissions.

10.5.3. Similarly, other respondents focus on noise mitigations and the development of quieter aircraft. While some, including business umbrella bodies, airlines and a local authority, agree with the DfT's statement that aircraft are getting quieter, most challenge this assumption either due to personal experience or other observations. For example, some local authorities, community groups and individuals argue that any decrease in noise per aircraft engine would be offset by increases in the total number of aircraft flying or the number of engines used (larger aircraft have more engines). Like with comments on air quality, respondents call for further research and suggest the introduction of legally or financially enforceable limits on noise levels.

Night flights

10.5.4. Night flight restrictions, other than those proposed as part of possible expansion of London Heathrow (which are reported below in Chapter 11), are mentioned by many respondents. Individuals tend to be supportive of such restrictions and complain that currently they have not been properly enforced. In terms of specific timings, a range of suggestions are made, including 10pm – 6am; 10:30pm – 6:30am; 11pm – 6am;

11pm – 7am; 8pm – 8am; or more generally that the ban be for 7 hours or 8 hours. In contrast, some businesses warn about the economic implications of such measures.

Flight techniques

- 10.5.5. A few respondents reference Continuous Climb Operations (CCO) and Continuous Descent Operations (CDO) in their responses. CCO is where an aircraft climbs continuously from take off until reaching its cruising altitude. This practice is in contrast to stepped climb, which includes periods of level flight. CDO is where an aircraft descends continuously, from either cruising altitude or the bottom of a holding stack, until reaching final approach. Again, this is in contrast to a stepped descent pattern.
- 10.5.6. Most of those who comment on these procedures are supportive of them as a means of mitigating noise and/or carbon emissions from air travel. However, some question the possibility of them being implemented, arguing that the policies and procedures in place – for example relating to climb rates - are based on outdated aircraft, and therefore need updating.
- 10.5.7. Two other flight techniques suggested by respondents in order to better mitigate the impacts of air travel include the use of steeper angles for take-off and/or descent; and reduction of the use of stacking. By contrast, one respondent suggests that the noise benefits of increasing the angle of ascent or descent may have been over-estimated, and that the benefits may only be marginal.

Other suggestions

- 10.5.8. Other suggestions made by respondents, for mitigating the impacts of air travel, include:
- reducing the number of flights overall;
 - increasing the use of large capacity planes, in order to reduce the total number of flights;
 - limiting the number of planes per hour on any one route;
 - limiting the maximum level of noise allowed on any one route;
 - a rebalancing of the policy of the sharing of benefits of technological improvements in favour of local communities;
 - greater coordination between airports of both airspace use (in order to increase efficiency and therefore lower noise and air pollution) and respite (so that communities overflown by two airports still get effective respite);
 - making it easier for communities to report noise problems, such as through a phone app;
 - a greater role for the Environment Agency in monitoring and/or enforcement of impacts and mitigation;

- application of the ‘polluter pays’ principle to airport, airlines or air passengers - to ‘fully compensate’ for the negative effects of air travel; and
- flying at a greater altitude close to airports (further explanation was not provided).

10.5.9. Other, more general comments made by respondents regarding mitigation of the impacts of air travel include:

- general questioning of existing mitigation measures and Government commitment to mitigation;
- commenting that no amount of mitigation measures or targets will ever be adequate to offset the impacts of air travel;
- general support for, or encouragement of, the mitigation of the impacts of air travel; and
- comments that any proposed mitigation measures will be offset by the increasing number of flights predicted for the future.

10.5.10. Finally, a number of airlines, air freight businesses, airports and other businesses draw attention to progress already made in mitigating the negative effects of air travel, both through better technology and improved practice at airports, as well as the efficiency gains made possible by the Single European Sky Project.

Chapter 11: Comments on the consultation process

11.1. Introduction

- 11.1.1. Respondents discuss various aspects of the consultation process as part of their responses. Their views are summarised in this chapter, which covers comments on the consultation process overall, the consultation materials and the consultation events.
- 11.1.2. Comments on DfT's concurrent consultation process on Draft Airports National Policy Statement are summarised in Chapter 12 of this report.

11.2. Comments and suggestions on the consultation process overall

- 11.2.1. Some respondents - mostly organisations, though from various categories - appreciate the opportunity to comment on the proposals and highlight the importance of conducting public consultations. A few of these ask to be kept updated and involved in the next stages of the process, particularly with regards to the establishment of ICCAN.
- 11.2.2. Many respondents are critical of the consultation process, arguing that they have not been adequately consulted and questioning the impact their feedback will have on the decision making process. One respondent describes the consultation as a 'tick-box' exercise. Specific criticisms are summarised below.

Timescale

- 11.2.3. A few respondents comment on the timing of the consultation, often in relation to the parallel consultation on Heathrow expansion. One of these respondents expresses concern that the consultation has been rushed because of the Government's proposal to expand Heathrow, leaving little time for a thorough consideration of the new performance based navigation technology (PBN). Another respondent believes that the consultation should have been conducted after a decision on a third runway at Heathrow has been made as this is likely to influence people's views. A few respondents say that revisions to the national aviation policy are expected to be published next year and believe that it would have been better to have the National Policy Statement consultation after that.

“Our view is that the UK airspace modernisation process is being rushed by Government to support its rushed decision to expand Heathrow last October. The evidence is clear from the Airports Commission Final Report that a three runway Heathrow will require major changes to the way London’s airspace operates.”

Local authority, User ID 131338

11.2.4. Some respondents call for an extension of the consultation, citing a number of reasons such as the uncertainty caused by the snap general election and Brexit overshadowing the consultation publicity. Others call for a second consultation in the context of their requests for additional information and clarifications on some of the proposals. Another respondent suggests that the consultation is indefinitely extended with a website where anyone can continually provide feedback.

Lack of publicity

11.2.5. A few respondents also argue that the consultation was not been sufficiently advertised, which shortened the time they had available to consider and respond to the proposals. Related to this, a few respondents query if the relevant stakeholders have been notified and consulted with; Public Health England and Brecon Beacons National Parks Authority being mentioned specifically.

...we have only just learned, from another organisation who equally had not been informed, of this consultation and are concerned that we had not been included as stakeholders or directly notified parties in order to give this more detailed consideration.

Environment group, User ID 131330

Lack of information

11.2.6. Respondents comment that more information and detail is needed in relation to many of the detailed proposals covered by the consultation questions. These comments are summarised in the corresponding chapters of this report.

Other comments on the process

11.2.7. A few respondents believe that the further guidance on aviation noise policy, which is to inform decisions on airspace design and use, should be published in draft form and consulted on.

11.2.8. Finally, a few respondents highlight that a recent consultation by the CAA overlaps with this consultation. They stress the importance of aligning the approaches and proposals taken forward from these two consultations.

11.3. Comments on consultation materials

11.3.1. The majority of the comments made on the consultation materials are critical with respondents describing them as long, too technical and difficult to find and use (including the online form). A few respondents, as part of a co-ordinated response, feel that the tone of the consultation document is biased in favour of the aviation industry. They cite examples from the document where they believe industry concerns have been emphasised over community impacts.

“I am not sure who the target audience for your Response Form is, but it does not appear to have been designed to be used by the general public. It is highly complex and technical and requires in depth knowledge of UK airspace and the various agencies and policies involved”

Individual, User ID 104807

11.3.2. In contrast, some respondents comment that the consultation materials are well written, user friendly and easy to navigate with a few highlighting the usefulness of the diagrams and illustrations. One local authority respondent comments that they believe an appropriate level of technical understanding has been assumed in the consultation questions and materials.

“It is difficult to gauge the level of technical understanding when setting consultation questions or reference but I think this document strikes a balance”

Local authority, User ID 129551

Suggestions relating to the consultation document

11.3.3. A few respondents make recommendations on how the consultation document could be edited to improve its clarity. These include:

- supplement paragraphs 5.47 to 5.50 with comments from elsewhere in the document, specifically the statement in 5.13 which gives further guidance on some of the guidelines;
- make it clearer where guidance on Airspace Changes can be found in terms of operational, environmental and economic elements;
- in order to emphasise the general importance of safety, bring up the issues at the beginning of the document, rather than in chapter 3, para. 3.2; and
- present the section referencing ‘the requirements for engagement on changes to vectoring and reporting on the evolution of traffic flows’ in a separate section to ‘airspace changes’. If retained, tier 3 should reference ‘airspace usage’ rather than ‘airspace change’.

11.4. Comments on the consultation events

- 11.4.1. Some respondents criticise the consultation events, saying that there were not well publicised and too limited in scope and detail.
- 11.4.2. In contrast, a few respondents (mostly statutory bodies and local authorities) were pleased with the events and the information presented as part of them.

11.5. Comments on the scope of the consultation

- 11.5.1. In addition to the consultation process, some respondents comment on the scope of the consultation in terms of the proposals set out in the consultation document.
- 11.5.2. A few respondents see the omission of proposals relating to the General Aviation (GA) sector as being a major shortcoming of the consultation. These respondents emphasise the importance of the GA sector and hence the need for new policies to be created which also consider the sector. A few of these respondents also criticise references in the consultation to ‘uncontrolled airspace’ as being inaccurate, due to the existence of relevant control procedures and the existence of the UK’s Air Traffic Services Outside Controlled Airspace (ATSOCAS). One respondent criticises the segregation of the aviation sector and its policies and calls for a more joined-up approach. A few respondents query why the CAA’s definition of overflight (see Chapter 6 of this report) has not been consulted on.

“As the aviation sector has grown and controlled airspace has expanded this segregation has begun to break down as evidenced by the growth in airspace infringements. We are approaching the time when the UK airspace model must change or of GA and military aviation will be unable to operate effectively. The strategy you are now proposing presents an opportunity to create an integrated airspace system, benefitting the air transport industry and the public whilst providing a sustainable future for the GA sector.”

Other organisation, User ID 129547

- 11.5.3. Other areas cited by respondents as significant omissions from the consultation document and policies include:
- remotely Piloted Air Systems (RPAS) and Unmanned Aerial Vehicles (UAVs);
 - policies regarding aircraft design, engine silencing, rates of climb and descent and angles of climb and descent;
 - proper recognition of the impact of ground noise; and
 - proper recognition of the impact of helicopter noise.

Appendix A: List of participating organisations

The table below lists the names of all the organisations which submitted responses to the UK Airspace Policy consultation. They are listed by sector, and alphabetically within each sector.

Any businesses which are deemed small enough so that an individual could be identified from their response have not been listed. Also, organisations have not been listed if they indicated that their response should be treated as confidential. Some organisations submitted multiple responses, however their name has been included only once.

It cannot be fully assured that all organisations have been accurately categorised as they did not all classify themselves. Categorisation of responses was carried out separately from coding and does not affect the way in which coding is carried out.

Air freight business
FedEx
UPS
AICES
Air Navigation Service Provider
NATS
Airline
International Airlines Group
Monarch Airlines Ltd.
Thomson Airways
Virgin Atlantic Airways Ltd.
Airport
Birmingham Airport Ltd.
Bristol Airport
Edinburgh Airport Ltd.
Gatwick Airport Ltd.
Heathrow Airport Ltd.
Humberside International Airport Ltd.
Leeds Bradford Airport Ltd.

London Biggin Hill Airport
London City Airport
London Luton Airport
London Luton Airport Ltd.
Manchester Airports Group
Newcastle International Airport
TAG Farnborough Ltd.
Business umbrella body
Aerospace Defence Security (ADS)
Airlines UK
Airport Operators Association (AOA)
Association of British Travel Agents (ABTA)
International Air Transport Association (IATA)
London First
Regional and City Airports
Sustainable Aviation
The Sky's the Limit campaign
Community group
Aviation Communities Forum (41 community groups)
Back Ifold, Plaistow and Loxwood Against Noise and Emissions' (BIPLANE)
Bedwell Residents' Group
Belfast City Airport Watch
Caddington Air Defence
CAGNE Communities Against Gatwick Noise and Emissions
Ealing Aircraft Noise Action Group (EANAG)
Ealing Fields Residents Association (EFRA)
East Sussex Communities for the Control of Air Noise
Easters and Rodings Action Group (against Stansted noise) (EARAG)

Edinburgh Airport Watch
Egham Residents' Association
Englefield Green Action Group (EGAG)
Foley Mews Residents
Gatwick Area Conservation Campaign
Gatwick Obviously Not (GON)
HACAN and HACAN East
High Weald Councils Aviation Action Group (HWCAAG)
Hitcham and Taplow Society
LADACAN (Luton And District Association for the Control of Aircraft Noise)
Nutfield Conservation Society
People Against Intrusive Noise (PAIN)
Plane Justice
Plane Wrong
Residents Action Group Elmbridge (RAGE)
Richings Park Residents' Association
Richmond Heathrow Campaign
St Albans Quieter Skies
Staines Town Society
Stevenage South Residents
Stop Stansted Expansion
Teddington Action Group
Westminster City College (students' community)
Environment group
Aviation Environment Federation
Chiltern Countryside Group
Chiltern Society
CPRE Hampshire
CPRE Kent

CPRE Sussex
Cranborne Chase AONB (9 councils and 7 community/environmental groups)
Richmond and Twickenham Friends of the Earth
Stour and Orwell Society
West London Friends of the Earth
Large business
Rolls-Royce plc
Local authority
Bletchingley Parish Council
Bracknell Forest's Economic and Skills Development Partnership (ESDP)
Buckinghamshire and Milton Keynes Association of Local Councils
Buckinghamshire County Council, South Bucks District Council and Buckinghamshire Thames Valley Local Enterprise Partnership
Buckland Parish Council
Burstow Parish Council
Cabinet Member for Environment, Waltham Forest Council
Charlwood Parish Council
Chiddingstone Parish Council
Convention of Scottish Local Authorities (COSLA)
Crawley Borough Council - Principal EHP - Pollution, Public Health and Licensing
East Hampshire District Council
East Herts Council
East Sussex County Council
Edenbridge Town Council
Elmbridge Borough Council
Essex County Council
Felbridge Parish Council
Fermanagh and Omagh District Council

Flamstead P/C Working Group
Hertfordshire County Council
Horley Town Council
Horsham District Council
Horsmonden Parish Council
Kent County Council
Leicestershire County Council
Leigh Parish Council
Liss Parish Council
London Borough of Ealing
London Borough of Hammersmith and Fulham
London Borough of Havering
London Borough of Hounslow
London Borough of Lewisham
London Boroughs of Richmond-upon-Thames, Hillingdon & Wandsworth, Royal Borough of Windsor & Maidenhead
Mayfield and Five Ashes Parish Council
Mayor of London's Office, Deputy Mayor for Transport
Mole Valley District Council
New Forest National Park Authority
Newdigate Parish Council
Nutfield Parish Council
Reigate and Banstead Borough Council
Royal Borough of Greenwich
Royal Borough of Windsor & Maidenhead
Runnymede Borough Council
Salfords and Sidlow Parish Council
Slinfold Parish Council
Solihull Metropolitan Borough Council
Spelthorne Borough Council

St Albans City and District Council
Stevenage Borough Council
Strategic Aviation Special Interest Group (SASIG)
Surrey County Council
Swindon Borough Council
Taplow Parish Council
The London Borough of Southwark
Tring Town Council
Tunbridge Wells Borough Council
Uttlesford District Council
Warnham Parish Council
West Sussex County Council
Westerham Town Council
Wheathampstead Parish Council
Wigginton Parish Council
Withyham Parish Council
Woburn Parish Council
Other
Cheshire Flyers
British Hang Gliding and Paragliding Association
England's Economic Heartland
Future Airspace Strategy VFR Implementation Group (FASVIG Ltd.)
General Aviation Alliance
High Weald AONB Unit
Lasham Gliding Society
Prospect
Royal Aeronautical Society
The Chartered Institute of Logistics and Transport (CILT)
UK Future Airspace Strategy Industry Implementation Group (FASIIG)

Winbourne Martin French
Joint response: Heathrow Airport, Spelthorne Borough Council and HACAN
Statutory body
Aberdeen International Airport Consultative Committee
Bristol Airport Consultative Committee
Civil Aviation Authority (CAA)
Department for Infrastructure, Northern Ireland
Gatwick Airport Consultative Committee (GATCOM)
Historic England
Local Authorities' Aircraft Noise Council (LAANC)
London Luton Airport Consultative Committee (LLACC)
Manchester Airport Consultative Committee
Minister for Transport and the Islands: Scottish Government
Newcastle Airport Consultative Committee
Southampton International Airport Consultative Committee
Stansted Airport Consultative Committee
The Chilterns Conservation Board
Welsh Government

Appendix B: List of codes

Key to additional letters in codes

E - Environment

I – Impact

G – Gatwick

H – Heathrow

M – Measures (for mitigating impacts)

S – Scheme

Q1 – Cross-cutting issues

Q1 - 3 tier process - clarify

Q1 - 3-tier process - criticise

Q1 - 3-tier process - support

Q1 - Airspace management - challenge

Q1 - Compensation - last resort

Q1 - Compensation - suggestion

Q1 - Compliance - suggestions

Q1 - Costs - concern

Q1 - Definitions

Q1 - ICCAN involvement - other comment

Q1 - ICCAN involvement - support

Q1 - Policy - greater government intervention

Q1 - Previous changes/decisions/general mistrust

Q1 - Process - challenge

Q1 - Process - Increased public engagement - challenge

Q1 - Process - Increased public engagement - support

Q1 - Process - Role of CAA

Q1 - Process - Role of CAA - mistrust

Q1 - Process - Role of CAA - support

Q1 - Process - Role of ICCAN - suggestion

Q1 - Process - Role of NATS - concern

Q1 - Process - Role of NATS - suggestion

Q1 - Process - Suggestions

Q1 - Process - Support

Q1 - Process - Support - transparency

Q1 - Roles - CAA - oversight

Q1 - Roles - Government - accountability

Q1 - Section 106 agreement comments

Q1 - Support proposals

Q1a – Tier 1 changes
*Q1a - Neither oppose nor support/no comment
*Q1a - Oppose proposals
*Q1a - Proposals inadequate
*Q1a - Support proposals
*Q1a - Support proposals with caveat
Q1a - Criteria - clarification needed
Q1a - Criteria - Concern/Suggestion - air quality/environment
Q1a - Criteria - Concern/Suggestion - too restrictive/should be wider
Q1a - Criteria - Suggestions - other
Q1a - Criteria(1) - Strategic nat importance - question/challenge
Q1a - Criteria(1) - Strategic nat importance - support
Q1a - Criteria(2) - Impact economic growth - question/challenge
Q1a - Criteria(2) - Impact economic growth - support
Q1a - Criteria(3) - 10,000 people - question
Q1a - Criteria(3) - Challenge - 54 dB LAeq
Q1a - Criteria(3) - Challenge both noise and people thresholds
Q1a - Criteria(3) - Clarification needed
Q1a - Criteria(3) - Quality of life/health impact - question/suggestion
Q1a - Criteria(3) - Suggestion - noise
Q1a - Criteria(3) - Suggestion - other
Q1a - Criteria(3) - Suggestion - people
Q1a - Current - Flight paths/vectoring/conc
Q1a - Current - Other comments
Q1a - Current - Role of SofS
Q1a - Effects on change sponsors
Q1a - Process - Clarification needed
Q1a - Process - Concern - mistrust/not independent
Q1a - Process - Concern - not democratic
Q1a - Process - Concern - not transparent
Q1a - Process - Concern - other
Q1a - Process - Concern - time consuming/hinder growth/cost
Q1a - Process - Concern - timing (28 days)
Q1a - Process - Concern/Suggestion - independent oversight/appeal
Q1a - Process - More information required
Q1a - Process - Role of ACCs
Q1a - Process - Role of CAA - mistrust
Q1a - Process - Role of CAA - sufficient/support
Q1a - Process - Role of CAA - suggestion
Q1a - Process - Role of ICCAN
Q1a - Process - Role of SofS - concern - time consuming/hinder growth/cost
Q1a - Process - Role of SofS - other comments
Q1a - Process - Role of SofS - suggestion - other
Q1a - Process - Role of SofS - suggestion - share powers
Q1a - Process - Role of SofS - suggestion - wide powers

Q1a - Process - Role of SofS - support
Q1a - Process - Role of SofS - support - role of government
Q1a - Process - Role of SofS - support - transparency/accountability/democratic
Q1a - Process - Role of SofS - support - will protect communities
Q1a - Process - Suggestion - all UK airports
Q1a - Process - Suggestion - clarity
Q1a - Process - Suggestion - local authorities
Q1a - Process - Suggestion - more govt. involvement
Q1a - Process - Suggestion - other
Q1a - Process - Suggestion - parliament instead
Q1a - Process - Suggestion - public consultation
Q1a - Process - Suggestion - regulatory impact assessment
Q1a - Process - Suggestion - review/retrospective application
Q1a - Process - Suggestion - tier 2 as well
Q1a - Process - Suggestion - timeline
Q1a - Process - Suggestion - widen application
Q1a - Process - Support - (general, including reasons)
Q1a - Process - Support - role of government
Q1a - Process - Support - speed
Q1a - Process - Support - transparency/accountability/democratic
Q1a - Process - Support - will protect communities
Q1a - Suggestions (general/other)
Q1b – Tier 2 changes
*Q1b - Oppose proposals - feasibility
*Q1b - Oppose proposals - inadequate
*Q1b - Oppose proposals - other reasons
*Q1b - Support proposals
*Q1b - Support proposals with caveat
Q1b - 1 - Engagement noise 7000ft - challenge/change altitude criteria
Q1b - 1 - Engagement noise 7000ft - challenge/change noise criteria
Q1b - 1 - Engagement noise 7000ft - impact on communities
Q1b - 1 - Engagement noise 7000ft - qualify engagement
Q1b - 1 - Engagement noise 7000ft - support
Q1b - 2 - CAA should assess such proposals - other comments
Q1b - 2 - CAA should assess such proposals - support
Q1b - 3 - CAA to create policy on change process - other comments
Q1b - 3 - CAA to create policy on change process - support
Q1b - CAA - Current/previous decisions/problems
Q1b - CAA - Oppose in general
Q1b - CAA - Replace/supplement with an independent authority
Q1b - CAA - Suggestions - better prior understanding
Q1b - CAA - Suggestions - other
Q1b - CAA - Support proposed role
Q1b - Criteria - Suggestion

Q1b - Criteria - Too restrictive
Q1b - Current - Lack of transparency
Q1b - Current - Other comments
Q1b - More information required
Q1b - Need case
Q1b - Previous changes/decisions - Other comments
Q1b - Process - Appeal mechanism - support/oppose
Q1b - Process - Clarification needed
Q1b - Process - Compliance
Q1b - Process - Concern - risk of delay
Q1b - Process - Exclusions - challenge
Q1b - Process - Local involvement/interests - scepticism
Q1b - Process - Proportionate - challenge
Q1b - Process - Role of ANSPs
Q1b - Process - Role of NATS - other comments
Q1b - Process - Role of NATS - suggestion
Q1b - Process - Suggestion - apply to other airports/sponsors
Q1b - Process - Suggestion - compensation
Q1b - Process - Suggestion - independent oversight
Q1b - Process - Suggestion - more consultation when making changes
Q1b - Process - Suggestion - more environmental assessment
Q1b - Process - Suggestion - more local involvement
Q1b - Process - Suggestion - other
Q1b - Process - Suggestion - regulatory impact assessment
Q1b - Process - Suggestion - timeframe
Q1b - Vectoring - Challenge/concern
Q1b - Vectoring - Consider changes
Q1b - Vectoring - Current
Q1b - Vectoring - Suggestions
Q1c – Tier 3 changes
Q1c - Oppose proposals - Not robust/effective
Q1c - Oppose proposals - Not transparent
Q1c - Oppose proposals - Oppose airspace changes
Q1c - Oppose proposals - Unnecessary/not worthwhile
Q1c - Support proposals
Q1c - Support proposals - Control
Q1c - Support proposals - Specific aspect
Q1c - Support proposals - Transparency/accountability
Q1c - Support proposals with caveat
Q1c - Community engagement - Already happens/improve existing
Q1c - Community engagement - Challenge/question/lack of faith
Q1c - Community engagement - Limit/dissemination only
Q1c - Community engagement - Lower threshold
Q1c - Community engagement - Other suggestions/comments

Q1c - Community engagement - Required (general)
Q1c - Community engagement - Required (specific engagement/stakeholder)
Q1c - Community engagement - Suggestions - info consolidation/provision
Q1c - Compliance - Doubt/must ensure monitoring/compliance
Q1c - Current - Industry prioritised
Q1c - Current - Lack of engagement/views are ignored
Q1c - Current - Lack of transparency/honesty
Q1c - Current - Overflights
Q1c - Data/reporting - Concern
Q1c - Data/reporting - Other comment/suggestion
Q1c - Data/reporting - Should not be retrospective
Q1c - Data/reporting - Support retrospective timing
Q1c - ICCAN involvement - Must be free from CAA
Q1c - ICCAN involvement - Must be independent
Q1c - ICCAN involvement - Need more power
Q1c - ICCAN involvement - Need trigger points
Q1c - ICCAN involvement - Oppose
Q1c - ICCAN involvement - Other comment
Q1c - ICCAN involvement - Support
Q1c - Light touch approach - Oppose/need tighter control
Q1c - Light touch approach - Other comment
Q1c - Light touch approach - Support/accept
Q1c - Need case - Challenge
Q1c - Need case - Support
Q1c - Policy - Appeal process
Q1c - Policy - Consider other factors/priorities
Q1c - Policy - Further assessment required
Q1c - Policy - Implementation should be robust
Q1c - Policy - Include review period
Q1c - Policy - Localised decision-making - support/oppose
Q1c - Policy - Needs clarity
Q1c - Policy - Other suggestions
Q1c - Policy - Other suggestions - tier 2 trigger
Q1c - Policy - Oversight
Q1c - Policy - Prioritise local impact
Q1c - Policy - Questions/further information needed
Q1c - Policy - Should be simplified/sped up
Q1c - Policy - Should be 'suitable'
Q1c - Policy - Should be transparent/honest
Q1c - Policy - Terminology
Q1c - Previous changes/decisions - CAA
Q1c - Previous changes/decisions - LCY
Q1c - Previous changes/decisions - LGW
Q1c - Previous changes/decisions - LHR
Q1c - Previous changes/decisions - LTN

Q1c - Previous changes/decisions - PBN trials
Q1c - Roles - ACCs
Q1c - Roles - CAA - mistrust
Q1c - Roles - CAA - monitor/review/guidance
Q1c - Roles - CAA - must be involved/have power
Q1c - Roles - CAA - must not be involved
Q1c - Roles - CAA - other comment
Q1c - Roles - CAA - suggestion
Q1c - Roles - CAA - transparency/information sharing
Q1c - Roles - Government - clarity
Q1c - Roles - Government - less power
Q1c - Roles - Government - more power
Q1c - Roles - Industry
Q1d – Compensation proposals
*Q1d - Oppose proposals
*Q1d - Oppose proposals - inadequate
*Q1d - Oppose proposals - reduce noise instead
*Q1d - Oppose proposals/challenge - industry impact
*Q1d - Support proposals
*Q1d - Support proposals - addresses issues
*Q1d - Support proposals – fair
*Q1d - Support proposals - noise levy rejection
*Q1d - Support proposals - thorough/stringent
*Q1d - Support proposals with caveat
Q1d - 1 - Not just infrastructure changes - challenge
Q1d - 1 - Not just infrastructure changes - oppose
Q1d - 1 - Not just infrastructure changes - support
Q1d - 1 - Not just infrastructure changes - support with caveat
Q1d - 2 - Any change above 63 dB - challenge/lower threshold
Q1d - 2 - Any change above 63 dB - oppose
Q1d - 2 - Any change above 63 dB - suggestion/other comment
Q1d - 2 - Any change above 63 dB - support
Q1d - 3 - Increased overflight - challenge
Q1d - 3 - Increased overflight - enforce not encourage
Q1d - 3 - Increased overflight - no overflight definition
Q1d - 3 - Increased overflight - suggestion/other comment
Q1d - 3 - Increased overflight - support
Q1d - 3 - Increased overflight - support with caveat
Q1d - 4 - Non-movers above 69 dB - challenge/lower threshold
Q1d - 4 - Non-movers above 69 dB - support
Q1d - Amount - Comment on paragraph 4.40
Q1d - Amount - Flexible/local schemes
Q1d - Amount - Full financial contribution
Q1d - Amount - Individuals should receive tax breaks

Q1d - Amount - Land Compensation Act
Q1d - Amount - No amount adequate
Q1d - Amount – Property value loss
Q1d - Amount - Proportionate to impact
Q1d - Amount - Relocation cost/assistance
Q1d - Concern - Balance
Q1d - Concern - Communication/awareness
Q1d - Concern - Compliance
Q1d - Concern - Impact on environment
Q1d - Concern - Property/property values
Q1d - Concern - Scepticism
Q1d - Costs - Concern
Q1d - Costs - Individuals should receive tax breaks
Q1d - Costs - Polluter pays
Q1d - Costs - Traveller pays
Q1d - Costs - Who pays
Q1d - Criteria - Alter to include fewer people
Q1d - Criteria - Alter to include more people/lower dB trigger
Q1d - Criteria - Consider non-noise factors
Q1d - Criteria - Criticisms
Q1d - Criteria - Doubt ability to develop satisfactory criteria
Q1d - Criteria - Suggestions
Q1d - Criteria - Suggestions - 50 dB
Q1d - Criteria - Suggestions - night noise
Q1d - Criteria - Suggestions - WHO standards
Q1d - General - Balanced approach
Q1d - General - Comments on current policy
Q1d - General - Compensation as a last resort
Q1d - General - Compensation will incentivise industry
Q1d - General - Oppose/restrict/unnecessary
Q1d - General - Personal request
Q1d - General - Prioritise mitigation/reduce noise
Q1d - General - Question motivation/other challenge
Q1d - General - Questions/further information needed
Q1d - General - Reduce noise as well as compensating
Q1d - General - Support measures in general/principle
Q1d - General - Tier 3 comments
Q1d - Insulation - Challenge
Q1d - Insulation - Compensate property not owner
Q1d - Insulation - Doesn't work outside/don't want to live in a sealed home
Q1d - Insulation - Insufficient/inadequate/challenge
Q1d - Insulation - Not always effective
Q1d - Insulation - Not always permitted
Q1d - Insulation - Suggestion
Q1d - Insulation - support in general

Q1d - Previous changes/decisions - LGW
Q1d - Previous changes/decisions - LHR
Q1d - Previous changes/decisions - LTN
Q1d - Previous changes/decisions - Noise/aircraft changes
Q1d - Previous changes/decisions - STN
Q1d - Previous changes/decisions/general mistrust
Q1d - Suggestions - Compliance
Q1d - Suggestions - Direct towards specific cause
Q1d - Suggestions - Independent authority
Q1d - Suggestions - Noise levy
Q1d - Suggestions - Other
Q1d - Suggestions - Retrospective payment
Q2 – Options Analysis and Noise Assessment
*Q2a - Oppose proposals
*Q2a - Support proposals
*Q2a - Support proposals with caveat
*Q2b - Oppose proposals
*Q2b - Support proposals
*Q2b - Support proposals with caveat
*Q2b - 1 - Assessment - support webTAG for assessing health and wellbeing / quality of life
*Q2b - 2 - Assessment - support frequency of noise events measurement
Q2 - ABPs - Arbitrary/need further justification
Q2 - ABPs - Challenge AMSL
Q2 - ABPs - Challenge current policy
Q2 - ABPs - Examples of breaching practice
Q2 - ABPs - Higher priority of N over CE
Q2 - ABPs - Other comments
Q2 - ABPs - Prioritise noise more (general)
Q2 - ABPs - Prioritise noise to 5000 ft.
Q2 - ABPs - Prioritise noise to 6000 ft.
Q2 - ABPs - Prioritise noise to 7000 ft.
Q2 - ABPs - Suggestion
Q2 - ABPs - Support
Q2 - AN - I - at specific altitude(s)
Q2 - AN - I - DALYs
Q2 - AN - I - health/quality of life
Q2 - AN - I - hospitals
Q2 - AN - I - schools/children
Q2 - AN - I - sleep disturbance
Q2 - AN - I - work/productivity
Q2 - AN - I - worse in quiet/rural areas
Q2 - AN - problems caused by Englefield Green trials
Q2 - AN - problems caused by LCY concentration/changes

Q2 - AN - problems caused by LGW concentration/changes
Q2 - AN - problems caused by LHR concentration/changes
Q2 - AN - problems caused by LTN concentration/changes
Q2 - AN - problems caused by other concentration/changes
*Q2 - Assessment - Challenge (general/non-specific)
*Q2 - Assessment - Other challenges
*Q2 - Assessment - Other comments
*Q2 - Assessment - Other suggestions/priorities
*Q2 - Assessment - Support (general, including reasons)
*Q2 - Assessment - Support improved assessment in general
*Q2 - Assessment - Support with caveats
Q2 - Assessment - 57 dB - challenge use / support replacement
Q2 - Assessment - 57 dB - continue to use as well
Q2 - Assessment - Annoy - challenge
Q2 - Assessment - Annoy - challenge SoNA
Q2 - Assessment - Annoy - other comments
Q2 - Assessment - Annoy - reference SoNA
Q2 - Assessment - Annoy - suggestion (SoNA/general)
Q2 - Assessment - Challenge - biased/favours industry
Q2 - Assessment - Challenge - lower values cause distortion/neglect of most affected
Q2 - Assessment - Challenge - metrics not low enough/people excluded
Q2 - Assessment - Challenge - rural areas/excludes background noise
Q2 - Assessment - Challenge use of averaging/does not account for respite
Q2 - Assessment - Ensure assessment/metrics are understandable
Q2 - Assessment - Health - assessment insufficient / need more (general)
Q2 - Assessment - Health - suggestion
Q2 - Assessment - Health - support assessment in general
Q2 - Assessment - Health - use WHO guidelines
Q2 - Assessment - Include 51 dB LAeq 4hr
Q2 - Assessment - Include 55 dB LAeq/Lden/N55
Q2 - Assessment - Include air quality
Q2 - Assessment - Include ambient/background noise
Q2 - Assessment - Include better quantification of respite
Q2 - Assessment - Include duration of loud events
Q2 - Assessment - Include frequency of noise
Q2 - Assessment - Include Lmax / peak noise
Q2 - Assessment - Include more data/sources/analysis (general)
Q2 - Assessment - Include more monitoring/actual data / less reliance on modelling
Q2 - Assessment - Include noise from other sources
Q2 - Assessment - Influence on decisions
Q2 - Assessment - Involve ICCAN
Q2 - Assessment - Need further definition/examples
Q2 - Assessment - Need more consultation on proposals

Q2 - Assessment - Overflight definition (CAP 1498) - challenge/suggest amendment/choose angle
Q2 - Assessment - Overflight definition (CAP 1498) - support
Q2 - Assessment - Publish data/methodology
Q2 - Assessment - Review regularly
Q2 - Assessment - Separate East and West contours
Q2 - Assessment - Suggest/support 54 dB contour
Q2 - Assessment - Support 45 dB Lnight LOAEL
Q2 - Assessment - Support 51 dB LAeq 16hr LOAEL
Q2 - Assessment - Support N60/N65
Q2 - Assessment - Support NOEL/LOAEL/SOAEL in principle
Q2 - Assessment - Use on recent/current proposals
Q2 - Assessment - WebTAG - concern/develop further for aviation
Q2 - Assessment - WebTAG - need more info
Q2 - Assessment - WebTAG - other comments
Q2 - Assessment - WebTAG - request independent review
Q2 - Comments/criticisms on specific noise modelling
Q2 - Community involvement - Concern
Q2 - Community involvement - Consult
Q2 - Community involvement - Suggestions
Q2 - Community involvement - Support/encourage (general)
Q2 - Ensure noise guidelines/limits/proposals are complied with
*Q2 - Options analysis - Other comments
*Q2 - Options analysis - Other suggestions
*Q2 - Options analysis - Support (general, including reasons)
*Q2 - Options analysis - Support with caveat
Q2 - Options analysis - Comment on use of Green Book
Q2 - Options analysis - Conc/dispersion/respice - comments
Q2 - Options analysis - Effect on house prices / decisions
Q2 - Options analysis - Equity - airlines vs communities
Q2 - Options analysis - Equity - community vs community
Q2 - Options analysis - Equity - industry vs communities
Q2 - Options analysis - Equity - other comments
Q2 - Options analysis - Impact of concentration/dispersion
Q2 - Options analysis - Principle - must be fair
Q2 - Options analysis - Principle - must be transparent
Q2 - Options analysis - Principle - must be unbiased
Q2 - Options analysis - Principle - prefer concentration
Q2 - Options analysis - Principle - prefer dispersion/multiple routes
Q2 - Options analysis - Principle - support/encourage respice (general)
Q2 - Options analysis - Suggest - create and publish a schedule
Q2 - Options analysis - Suggest - criteria/Priorities
Q2 - Options analysis - Suggest - exclude unfeasible/unrealistic options
Q2 - Options analysis - Suggest - have a preliminary non-public stage
Q2 - Options analysis - Suggest - include all options / as many as possible

Q2 - Options analysis - Suggest - Include 'do nothing' option
Q2 - Options analysis - Suggest - Involve ICCAN
Q2 - Options analysis - Suggest - set noise limit for options
Q2 - Options analysis - Suggest - start at a high level
Q2 - Options analysis - Suggest - tier 1 only
Q2 - Options analysis - Suggest - what to publish/share
Q2 - Options analysis - Urban vs rural routeing
Q2 - Options analysis - Use on recent/current proposals
Q2 - Policy - Challenge (no suggested change)
Q2 - Policy - Concentration below 4000 ft.
Q2 - Policy - Concentration below 4000 ft. - other comments
Q2 - Policy - Limit no. of ppl - challenge/question (policy/wording/implementation)
Q2 - Policy - Limit no. of ppl - other comments
Q2 - Policy - Limit no. of ppl - reference only
Q2 - Policy - Limit no. of ppl affected (concentrate the impacts)
Q2 - Policy - Limit no. of ppl significantly affected (spread the impacts/agree policy)
Q2 - Policy - Limiting aircraft 4000-7000 ft.
Q2 - Policy - other comments
Q2 - Policy - Sharing of benefits of noise reduction / sustainable development
Q2 - Policy - Suggestion/amendment
Q2 - Policy - Support
Q2 - Previous changes/decisions/general mistrust
Q2 - Process - Timing
Q3 – Independent Commission on Civil Aviation Noise (ICCAN)
*Q3 - Oppose - Inadequate
*Q3 - Oppose - Not independent
*Q3 - Oppose - Not powerful enough
*Q3 - Oppose - Not transparent
*Q3 - Oppose - Other reason
*Q3 - Oppose - Unnecessary/detrimental
*Q3 - Oppose proposals - Lack of trust (based on previous/current record)
*Q3 - Support proposals
*Q3 - Support proposals with caveat
*Q3a - Oppose proposals - Lack of trust (based on previous/current record)
*Q3a - Oppose proposals - Not effective
*Q3a - Oppose proposals - Not independent
*Q3a - Oppose proposals - Not powerful enough
*Q3a - Oppose proposals - other reason
*Q3a - Oppose proposals - Waste of money
*Q3a - Support proposals
*Q3a - Support proposals with caveat
*Q3b - Oppose proposals - Not credible
*Q3b - Oppose proposals - Not independent
*Q3b - Oppose proposals - Not powerful enough

*Q3b - Oppose proposals - other reason
*Q3b - Oppose proposals - Waste of money
*Q3b - Support proposals
*Q3b - Support proposals with caveat
Q3 - Advise on airspace change - Challenge/question assurance process
Q3 - Advise on airspace change - Limit power
Q3 - Advise on airspace change - Need more power
Q3 - Advise on airspace change - Other comment/concern
Q3 - Advise on airspace change - Suggestion
Q3 - Advise on airspace change - Support
Q3 - Advise on noise management - Involve community
Q3 - Advise on noise management - Need more power
Q3 - Advise on noise management - Question/further info needed
Q3 - Advise on noise management - Suggestion
Q3 - Advise on noise management - Support
Q3 - Attributes - Accountable
Q3 - Attributes - Consider non-noise factors (including economic)
Q3 - Attributes - Credible
Q3 - Attributes - Ensure consistency/holistic view
Q3 - Attributes - Flexible/determined locally
Q3 - Attributes - Independent
Q3 - Attributes - Other suggestion
Q3 - Attributes - Partner with industry
Q3 - Attributes - Powerful/able to enforce
Q3 - Attributes - Represent/listen to local community
Q3 - Attributes - Transparent
Q3 - Comment on noise assessment process
Q3 - Commission research - Challenge/question effectiveness
Q3 - Commission research - Other comment/concern
Q3 - Commission research - Suggestions
Q3 - Commission research - Support
Q3 - Functions - Advise government
Q3 - Functions - Advise on health impact
Q3 - Functions - Consider noise only
Q3 - Functions - Consider non-noise factors (including economic)
Q3 - Functions - Coordinate across airports/UK
Q3 - Functions - Limit power/advisory only
Q3 - Functions - Mediation role
Q3 - Functions - Minimise/reduce noise
Q3 - Functions - Needs more power/enforcement ability
Q3 - Functions - Ombudsman role
Q3 - Functions - Other suggestions
Q3 - Functions - Regulatory/statutory role
Q3 - Functions - Review previous decisions/changes
Q3 - Funding - Independently fund/should not affect independence

Q3 - Funding - Industry should contribute/fund
Q3 - Funding - Industry should fund/part-fund
Q3 - Funding - Minimise dependence on CAA
Q3 - Funding - Needs sufficient funding/resourcing
Q3 - Funding - Other suggestions
Q3 - Funding - Other suggestions/comments
Q3 - Funding - Publicly fund/industry should not contribute
Q3 - Governance - Comment on lead/chair
Q3 - Governance - Include cross section
Q3 - Governance - Include expertise (suggestions)
Q3 - Governance - Include local interests/communities/groups
Q3 - Governance - Independence challenge
Q3 - Governance - Must be accountable
Q3 - Governance - Must be transparent/clear
Q3 - Governance - Oppose government oversight/influence
Q3 - Governance - Other comment/suggestion
Q3 - Governance - Other concern
Q3 - Governance - Support DfT inclusion
Q3 - Governance - Support government oversight/influence
Q3 - Governance - Terms of reference comment
Q3 - Independence - Challenge/question/impossible
Q3 - Monitor and QA - Challenge/question effectiveness
Q3 - Monitor and QA - Fines/penalties for breaches
Q3 - Monitor and QA - Need sanctioning/enforcement ability
Q3 - Monitor and QA - Other comment/concern
Q3 - Monitor and QA - Suggestions
Q3 - Monitor and QA - Support
Q3 - Need case - Challenge
Q3 - Need case - Support
Q3 - Other suggestions
Q3 - Other suggestions/comments
Q3 - Promote best practice - Challenge/question effectiveness
Q3 - Promote best practice - Health
Q3 - Promote best practice - Must be able to enforce
Q3 - Promote best practice - Suggestion
Q3 - Promote best practice - Support
Q3 - Question objectivity/effectiveness
Q3 - Questions / Further information needed
Q3 - Refer to current experience/situation
Q3 - Refer to previous changes/decisions
Q3 - Structure - Challenge location within CAA
Q3 - Structure - Must be independent
Q3 - Structure - Other comment/suggestion
Q3 - Structure - Prefer/suggest other option
Q3 - Structure - Set up quickly/already

Q3 - Structure - Support location within CAA
Q3 - Structure - Support with caveat CAA location
Q3 - Structure - Take more time/money to set up
Q3 - Structure - Will take time to set up
Q3 - Sunset review - ICCAN should be permanent/long-term
Q3 - Sunset review - Lengthen review period
Q3 - Sunset review - Other comment
Q3 - Sunset review - Other suggestions
Q3 - Sunset review - Shorten review period
Q3 - Sunset review - Support 5 year review period
Q4a – The Competent Authority
*Q4a - Oppose proposals
*Q4a - Support proposals
*Q4a - Support proposals with caveat
Q4a - Airports - Oppose/concern - conflict of interest
Q4a - Airports - Oppose/concern - current/past record
Q4a - Airports - Oppose/concern - resources
Q4a - Airports - Oppose/concern - role proposed (general)
Q4a - Airports - Other comments/suggestions
Q4a - Airports - Support
Q4a - Approach - Alternative - single competent authority
Q4a - Approach - Oppose localised (LA/Des Airports)
Q4a - Approach - Support localised (LA/Des Airports)
Q4a - CAA - Oppose/Criticism
Q4a - CAA - Suggestions on role/responsibility
Q4a - CAA - Support
Q4a - Compliance - Concern
Q4a - Compliance - Suggestions
Q4a - Current - Industry bad practice/currently inadequate
Q4a - Current - Industry good practice/currently effective
Q4a - ICCAN - Concerns
Q4a - ICCAN - Greater powers/role
Q4a - ICCAN - Insufficient - lacks power/independence
Q4a - ICCAN - Must be independent
Q4a - ICCAN - Oppose
Q4a - ICCAN - Suggestions
Q4a - ICCAN - Support
Q4a - Local Authorities - Concern - conflict of interest
Q4a - Local Authorities - Concern - examples of bad practice
Q4a - Local Authorities - Concern - multiple councils
Q4a - Local Authorities - Concern - practicality of planning process
Q4a - Local Authorities - Concern - resources/expertise
Q4a - Local Authorities - Oppose/concerns
Q4a - Local Authorities - Suggestions (role/responsibilities)

Q4a - Local Authorities - Support
Q4a - Local communities - Concern re involvement/influence
Q4a - Local communities - Greater involvement/role
Q4a - Local communities - Suggestions re role/involvement
Q4a - Process - Concern
Q4a - Process - Concern - de-designation
Q4a - Process - Concern - mistrust govt./other agency
Q4a - Process - Concern - not enough information
Q4a - Process - Concern - too complicated/responsibility unclear
Q4a - Process - Concern - too much focus on cost
Q4a - Process - Night flights - incompatible with planning process
Q4a - Process - Night flights - should remain government prerogative
Q4a - Process - Night flights - welcome local control
Q4a - Process - Other comments / suggestions
Q4a - Process - Query
Q4a - Process - Suggestions - clear publication
Q4a - Process - Suggestions - long term planning
Q4a - Process - Suggestions - need for independent oversight
Q4a - Role of CAA - Oppose/Criticism
Q4a - Role of CAA - Suggestions on role/responsibility
Q4a - Role of CAA - Support
Q4a - SoS/DfT - Concerns
Q4a - SoS/DfT - Oppose
Q4a - SoS/DfT - Oppose - current/past record
Q4a - SoS/DfT - Should retain power/responsibility
Q4a - SoS/DfT - Suggestions on role
Q4a - SoS/DfT - Suitability of NSIP process
Q4a - SoS/DfT - Support
Q4a - SoS/DfT - Support as single competent authority
Q4b – Responsibility for Noise Controls
*Q4b - Oppose proposals
*Q4b - Support proposals
*Q4b - Support proposals with caveat
Q4b - Compliance - Need for effective enforcement
Q4b - Current - Industry bad practice
Q4b - Des airports - Concern/Oppose proposals
Q4b - Des airports - Oppose - conflict of interest
Q4b - Des airports - Oppose - current/past record
Q4b - Des airports - Oppose - mistrust
Q4b - Des airports - Oppose - mistrust/conflict of interest
Q4b - Des airports - Oppose - Noise Management Boards (NMB)
Q4b - Des airports - Oppose - responsibility of govt.
Q4b - Des airports - Suggestions
Q4b - Des airports - Support proposals

Q4b - Government/Parliament - Concern
Q4b - Government/Parliament - Should retain role/responsibility
Q4b - Government/Parliament - Suggestions
Q4b - ICCAN - Greater role/involvement needed
Q4b - ICCAN - Insufficient - lacks power/independence
Q4b - ICCAN - Must have enforcement powers
Q4b - ICCAN - Suggestions
Q4b - ICCAN - Support role as proposed
Q4b - Local Authorities - Concern - conflict of interest
Q4b - Local Authorities - Concern - multiple councils
Q4b - Local Authorities - Concern - resources/expertise
Q4b - Local Authorities - Oppose/concerns
Q4b - Local Authorities - Suggestions
Q4b - Local Authorities - Support
Q4b - Local communities - Should have role
Q4b - Local communities - Suggestions
Q4b - Process - Concern
Q4b - Process - Concerns - complex/confusing
Q4b - Process - Night flights - oppose airport control
Q4b - Process - NPRs - oppose airport control
Q4b - NPRs - other comments
Q4b - Process - NPRs - support airport control
Q4b - Process - Other comments/suggestions
Q4b - Process - Query
Q4b - Process - Role of des airports - concern/oppose proposals
Q4b - Process - Suggestions
Q4b - Process - Suggestions - appeals process
Q4b - Process - Suggestions - clear guidance
Q4b - Process - Suggestions - need for independent oversight
Q4b - Process - Suggestions - stricter regulation
Q4b - Role of CAA - Oppose/concerns
Q4b - Role of CAA - Other comments/suggestions
Q4b - Role of CAA - Suggestions
Q4c – Publishing and Transparency
*Q4c - Oppose proposals
*Q4c - Support proposals
*Q4c - Support proposals with caveat
*Q4c - Support publishing of data in principle/general
Q4c - Compliance - Needs enforcement
Q4c - Compliance - Other ICCAN comments
Q4c - Compliance - Support ICCAN verification role
Q4c - Compliance - Support independent verification
Q4c - Concern - Achieves nothing/after the fact
Q4c - Concern - Doubt accuracy/transparency

Q4c - Current - Already available - difficult to obtain/inaccurate
Q4c - Current - Already available - through industry
Q4c - Current - Already available - through third party
Q4c - Current - Casper (Gatwick) - complex/inaccurate
Q4c - Current - Casper (Gatwick) - positive
Q4c - Current - Information unavailable
Q4c - Local determination - All airports should publish
Q4c - Local determination - Community involvement concern
Q4c - Local determination - Need minimum requirements
Q4c - Local determination - Prefer standard format
Q4c - Local determination - Support
Q4c - Outcomes - Allows comparison/analysis
Q4c - Outcomes - Must be used effectively
Q4c - Outcomes - Punish dropping performance
Q4c - Process - More information/detail needed
Q4c - Process - Noise envelope - Support
Q4c - Process - Suggestions - alternatives/other
Q4c - Suggestions - Clear guidance needed
Q4c - Suggestions - Data collection methods
Q4c - Suggestions - Greater accuracy needed
Q4c - Suggestions - How to publish - central system/online
Q4c - Suggestions - How to publish - must be clear/accessible
Q4c - Suggestions - How to publish - must be regular/real time
Q4c - Suggestions - How to publish - published locally
Q4c - Suggestions - What to publish - aircraft data (weight, type)
Q4c - Suggestions - What to publish - flight paths/height
Q4c - Suggestions - What to publish - flight times
Q4c - Suggestions - What to publish - incoming and outgoing flights
Q4c - Suggestions - what to publish - noise/air pollution
Q4c - Suggestions - what to publish - trends and analysis
Q4d - Incentives
Q4d - Current - Examples of bad practice
Q4d - Current - Examples of good practice/improvement
Q4d - ICCAN - Lacks/needs enforcement powers
Q4d - ICCAN - Oppose
Q4d - ICCAN - Suggestion
Q4d - ICCAN - Support
Q4d - Incentives - Insufficient
Q4d - Incentives - Insufficient - e.g. of bad practice
Q4d - Incentives - Insufficient - Heathrow
Q4d - Incentives - Insufficient - minimal improvements
Q4d - Incentives - Insufficient - need stricter regulation
Q4d - Incentives - Insufficient - conflict of interest
Q4d - Incentives - Oppose principle

Q4d - Incentives - Sufficient
Q4d - Incentives - Sufficient e.g. of good practice/improvement
Q4d - Incentives - Suggestions - ban high polluting planes
Q4d - Incentives - Suggestions - financial incentives/penalties
Q4d - Incentives - Suggestions - not just noise
Q4d - Incentives - Suggestions - rewards for progress
Q4d - Incentives - Support principle
Q4d - Priorities - Balance econ/environment
Q4d - Priorities - Environment/communities
Q4d - Priorities - Other
Q4d - Process - Concern - implementation
Q4d - Process - Must be independent of industry
Q4d - Process - Noise envelope - support
Q4d - Process - Positive
Q4d - Process - Role of des airports
Q4d - Process - Role of SofS
Q4d - Process - Suggestions - clear guidance needed
Q4d - Process - Suggestions - involve communities
Q4d - Process - Suggestions - more assessment/monitoring
Q5 – Comments on Draft Air Navigation Guidance
*Q5 - Oppose - Benefit not for community
*Q5 - Oppose - Higher impact on communities
*Q5 - Oppose - Ineffective/insufficient
*Q5 - Oppose - Lack of trust
*Q5 - Oppose - Misleading
*Q5 - Oppose - Need control/legislation
*Q5 - Oppose - Need stronger voice for communities
*Q5 - Oppose - Not strong enough/too much trust in industry
*Q5 - Oppose - Other reason
*Q5 - Oppose - Too much focus on financial/economic aspects
*Q5 - Support - General
*Q5 - Support - Greater clarity
*Q5 - Support - Informs wider audience
*Q5 - Support - Need/in principle
*Q5 - Support - With caveat
Q5 - ABPs - Challenge
Q5 - ABPs - Consider noise above 7000ft
Q5 - ABPs - Needs further info/clarification
Q5 - ABPs - Other comment/suggestion
Q5 - ABPs - Prioritise noise to 7000ft
Q5 - ABPs - Support
Q5 - ABPs - Support elevation caveat
Q5 - ABPs - Too simplistic/consider other criteria
Q5 - Air quality comment

Q5 - Airspace change - Change not needed/wanted
Q5 - Airspace change - Consult public
Q5 - Airspace change - Consult stakeholders
Q5 - Airspace change - Need scrutiny
Q5 - Airspace change - Need transparency
Q5 - Airspace change - Other comment/suggestion
Q5 - Airspace change - Should be simple/quick
Q5 - Airspace change - Support general
Q5 - Airspace change - Support temporary change process
Q5 - Airspace change - Support tier structure
Q5 - Airspace change - Tier 1
Q5 - Airspace change - Tier 2
Q5 - Airspace change - Tier 3
Q5 - Airspace change - Tier structure needs clarity
Q5 - Airspace change - Unclear/needs to be clear
Q5 - Airspace design - Comment
Q5 - Annex B - Comment/question
Q5 - Arrival procedures - Comment
Q5 - Assessment - Challenge overflight hypothesis
Q5 - Assessment - Concern
Q5 - Assessment - Needs review/support new metrics
Q5 - Assessment - Noise metrics comment
Q5 - Assessment - Other comment/suggestion
Q5 - Assessment - WebTAG concern
Q5 - Call-in criteria - Oppose
Q5 - Call-in criteria - Suggestion
Q5 - Call-in criteria - Support
Q5 - Call-in process - Should be quick
Q5 - Call-in process - Suggestion
Q5 - CCOs - Challenge use
Q5 - CCOs - Comment
Q5 - CCOs - Question ability to implement
Q5 - CCOs - Support introduction
Q5 - CDOs - Comment
Q5 - CDOs - Not sufficient
Q5 - Community involvement - Comment
Q5 - Community involvement - Limit/reduce
Q5 - Community involvement - Support
Q5 - Departure procedures - Other comment
Q5 - Departure procedures - Prioritise noise reduction
Q5 - Departure procedures - Use steeper climb gradient
Q5 - Environmental objectives - Air pollution
Q5 - Environmental objectives - Carbon emissions
Q5 - Environmental objectives - Challenge
Q5 - Environmental objectives - Noise reduction

Q5 - Environmental objectives - Suggestion
Q5 - Environmental objectives - Support
Q5 - Environmental Statement - Concern
Q5 - Environmental Statement - Support
Q5 - Environmental Statement comment
Q5 - GHGs comment
Q5 - Government role - Challenge/scepticism
Q5 - Government role - MPs
Q5 - Government role - Needs more power
Q5 - Government role - Other comment
Q5 - Government role - Prioritise/represent community
Q5 - Government role - Reduce/no input
Q5 - Government role - Support involvement
Q5 - Guidance - Change title
Q5 - Guidance - Consider latest noise evidence
Q5 - Guidance - Consider non-noise factors
Q5 - Guidance - Must be consistent with other policies
Q5 - Guidance - Need control/legislation
Q5 - Guidance - Omission/request addition
Q5 - Guidance - Require local consideration
Q5 - Guidance - Should be flexible/local
Q5 - Guidance - Subject to change/consulting too early
Q5 - Guidance - Unclear/needs to be clear
Q5 - Helicopters/light aircraft - Comment
Q5 - Introduction - Challenge guidance objectives
Q5 - Introduction - Comment
Q5 - Introduction - Support guidance objectives
Q5 - National Parks/AONBs - Comment
Q5 - National Parks/AONBs - Insufficient consideration
Q5 - National Parks/AONBs - Not as important
Q5 - National Parks/AONBs - Support proposal
Q5 - Noise sensitive buildings - Comment
Q5 - NPRs - Oppose relaxation
Q5 - NPRs - Question/further info requested
Q5 - NPRs - Suggestion
Q5 - NPRs - Support relaxation/review
Q5 - Options analysis - Avoid populated areas
Q5 - Options analysis - Avoid unaffected areas
Q5 - Options analysis - Avoid/prioritise rural areas
Q5 - Options analysis - Ban/limit night time flights
Q5 - Options analysis - Challenge 'fewer people' principle
Q5 - Options analysis - Consider other/non-noise factors
Q5 - Options analysis - Consider vulnerable people
Q5 - Options analysis - High impact on communities
Q5 - Options analysis - Must be fair

Q5 - Options analysis - Need better understanding
Q5 - Options analysis - Other comments/suggestions
Q5 - Options analysis - Prefer concentration
Q5 - Options analysis - Prefer dispersion/multiple routes
Q5 - Options analysis - Prioritise community
Q5 - Options analysis - Prioritise noise reduction
Q5 - Options analysis - Question viability of multiple routes
Q5 - Options analysis - Support community involvement
Q5 - Options analysis - Support local circumstances consideration
Q5 - Options analysis - Support proposals
Q5 - Options analysis - Support thorough process
Q5 - Options analysis - Support/encourage respite (general)
Q5 - Options analysis - Too onerous/complicated
Q5 - Options analysis - Use on recent/current proposals
Q5 - Other comments/concerns
Q5 - Other policies - Suggestion
Q5 - Other policies - Support
Q5 - Other specific CAA comments
Q5 - Other suggestions
Q5 - Prefer quieter aircraft/technology
Q5 - Prioritise commercial air transport
Q5 - Publication - Challenge
Q5 - Publication - Comment
Q5 - Publication - Suggestion
Q5 - Publication - Support
Q5 - Reduce number of flights
Q5 - Refer to current experience/situation
Q5 - Refer to previous changes/decisions
Q5 - Refer to previous responses
Q5 - Reference to previous guidance document
Q5 - Replication of flightpath - Comments
Q5 - Roles and responsibilities - CAA
Q5 - Roles and responsibilities - Challenge
Q5 - Roles and responsibilities - DfT
Q5 - Roles and responsibilities - Government (general)
Q5 - Roles and responsibilities - ICCAN
Q5 - Roles and responsibilities - Industry
Q5 - Roles and responsibilities - Local authorities
Q5 - Roles and responsibilities - SofS
Q5 - Roles and responsibilities - Suggestion
Q5 - Roles and responsibilities - Support
Q5 - Roles and responsibilities - ACCs

Air Travel - Impacts
*AN - General - Noise is a concern/priority
AN - Current - Noise is already a problem (aircraft ground noise)
AN - Current - Noise is already a problem (concentration)
AN - Current - Noise is already a problem (cumulative)
AN - Current - Noise is already a problem (general/planes above my head)
AN - Current - Noise is already a problem (inadequate respite)
AN - Current - Noise is already a problem (night flights)
AN - Current - Noise is already a problem (stacks)
AN - I - Noise will increase (Englefield Green)
AN - I - Noise will increase (not related to expansion)
AN - I - Other impacts
AN - I - Property/Property values
AQ - General - AQ Brexit concern
AQ - General - AQ is a concern/priority
AQ - Current - Already a problem (general)
AQ - Current - Targets not being met / problem not being addressed
AQ - Health - Impact on health
AQ - I - AQ will worsen (General/flights)
AQ - I - Health - asthma/respiratory conditions
AQ - I - Health - deaths/loss of life
AQ - I - On natural environment
AQ - I - On the NHS
AQ - I - Quality of life
AQ - I - Schools/Children
AQ - Ref NO, NOX/Nitrogen oxides
*CE - General - CE is a concern / support CE mitigation in principle/general
CE - I - Climate Change / Global Warming
Air Travel – Mitigation of Impacts
ASP - Cleaner aircraft - Already happening
ASP - Cleaner aircraft - Increases noise
ASP - Cleaner aircraft - Support/encourage
ASP - Compliance - Needs/lacks legally binding or enforceable AQ limits
ASP - Compliance - Needs/lacks legally binding or enforceable noise limits
ASP - Compliance - Needs/lacks legally binding or enforceable penalties
ASP - Compliance - Suggestions
ASP - Mitigation - Already happening
ASP - Mitigation - CCO concern/oppose
ASP - Mitigation - CCO suggest/support
ASP - Mitigation - CDO concern/oppose
ASP - Mitigation - CDO suggest/support

ASP - Mitigation - Fewer flights
ASP - Mitigation - Insufficient/question government commitment
ASP - Mitigation - Measures - support/sufficient/adequate
ASP - Mitigation - Minimise/reduce stacks
ASP - Mitigation - No amount enough
ASP - Mitigation - Offset by increasing flights
ASP - Mitigation - Other comment
ASP - Mitigation - Other suggestions
ASP - Mitigation - Steeper take-off/descent
ASP - Mitigation - Support general
ASP - Night flights restriction - 8 hours
ASP - Night flights restriction - Insufficient/extend
ASP - Night flights restriction - Oppose
ASP - Night flights restriction - Other comment
ASP - Night flights restriction - Suggestion
ASP - Night flights restriction - Support in principle
ASP - Principle - Consider air quality
ASP - Principle - Reduce noise
ASP - Principle - Reduce number of flights
ASP - Quieter aircraft - Challenge argument/doubt
ASP - Quieter aircraft - Other comment
ASP - Quieter aircraft - Suggestion
ASP - Quieter aircraft - Support
Airspace (general) - ASP
ASP - Oppose - Airspace modernisation
ASP - Oppose - Aviation growth/expansion
ASP - Oppose - Biased/favours industry
ASP - Oppose - Devolution/local decision-making
ASP - Oppose - Englefield Green changes
ASP - Oppose - Incorrect premise
ASP - Oppose - Not powerful enough
ASP - Oppose - Other comments/reasons
ASP - Support - All/general
ASP - Support - Enables airspace modernisation
ASP - Support - Government leadership/ownership
ASP - Support - Increased detail
ASP - Support - Need/in principle
ASP - Support - Other comments/reasons
ASP - Support - PBN introduction
ASP - Support - Will bring robustness/transparency
ASP - Support - Will build confidence/trust
ASP - Support - With caveat
ASP - Balanced approach - Apply
ASP - Balanced approach - Other comments

ASP - Community involvement - Concern
ASP - Community involvement - Other comments
ASP - Community involvement - Suggestion
ASP - Community involvement - Support
ASP - Community involvement - Unclear/needs clarity
ASP - Current situation
ASP - Edinburgh Airport comments
ASP - Mitigation - No amount enough
ASP - Modernise - Oppose
ASP - Modernise - Other comments
ASP - Modernise - Support - allows growth/economic benefit
ASP - Modernise - Support - benefits passengers
ASP - Modernise - Support - CE benefits
ASP - Modernise - Support - general/no reason
ASP - Modernise - Support - more efficient/joined up
ASP - Modernise - Support - out of date/overcrowded
ASP - Modernise - Support - reduce impact on communities
ASP - Modernise - Support - safer
ASP - Need case – Challenge/question
ASP - Other comments
ASP - Policy - Apply to all airports
ASP - Policy - Consider GA sector
ASP - Policy - Consider non-noise factors
ASP - Policy - Omission/request addition
ASP - Policy - Other concern
ASP - Policy - Prioritise/benefit community
ASP - Policy - Should be accountable
ASP - Policy - Should be consistent
ASP - Policy - Should be fair
ASP - Policy - Should be flexible/local
ASP - Policy - Should be joined up/coordinated
ASP - Policy - Should be long-term
ASP - Policy - Should be robust
ASP - Policy - Should be transparent
ASP - Policy - Should be unbiased/balanced
ASP - Policy - Should not be onerous
ASP - Policy - Should protect environment
ASP - Policy - Should support growth/modernisation
ASP - Policy - Suggestions
ASP - Policy - Unclear/needs clarity
ASP - Principle - Not being met/proposals insufficient
ASP - Principle - Oppose shared benefits proposal
ASP - Principle - Reduce no. of people affected
ASP - Principle - Reduce noise
ASP - Principle - Support shared benefits proposal

ASP - Refer to current situation/experience
ASP - Role of CAA
ASP - Transition process
Airspace Consultation Process - ACP
ACP - Events - Criticism
ACP - Events - Criticism - access
ACP - Events - Criticism - General
ACP - Events - Criticism - one-sided
ACP - Events - Criticism - outdated info
ACP - Events - Criticism - staff knowledge/lack of info
ACP - Events - Reference/comment on past/future event
ACP - Events - Suggestion
ACP - Events - Support
ACP - Material - Comment
ACP - Material - Criticism - assessment flawed/data or methodology used inaccurate or non-convincing
ACP - Material - Criticism - biased
ACP - Material - Criticism - cannot access
ACP - Material - Criticism - challenge argument/general data
ACP - Material - Criticism - general
ACP - Material - Criticism - info omitted/not presented (specific)
ACP - Material - Criticism - insufficient info/detail (non-specific)
ACP - Material - Criticism - insufficient info/info request
ACP - Material - Criticism - material too complicated / don't understand
ACP - Material - Criticism - question bias/problems
ACP - Material - Criticism - question too complicated / don't understand
ACP - Material - Criticism - specific data challenge
ACP - Material - Criticism - too long
ACP - Material - Criticism - vague/unclear
ACP - Material - Criticism - website
ACP - Material - Question
ACP - Material - Reference / Quote
ACP - Material - Suggestion - other
ACP - Material - Suggestion - layout/comprehension
ACP - Material - Suggestion - more specific/detailed
ACP - Material - Support
ACP - Process - Criticism - accessibility/complexity
ACP - Process - Criticism - general
ACP - Process - Criticism - government
ACP - Process - Criticism - local concerns discounted/ignored
ACP - Process - Criticism - no consultation of specific concern
ACP - Process - Criticism - no flight path info/want info
ACP - Process - Criticism - not wide enough/not enough publicity
ACP - Process - Criticism - oppose/just get on with it

ACP - Process - Criticism - other
ACP - Process - Criticism - predetermination
ACP - Process - Criticism - proposals not communicated
ACP - Process - Criticism - question impact of response
ACP - Process - Criticism - rushed/not enough time
ACP - Process - Criticism - scope too narrow
ACP - Process - Criticism - timing
ACP - Process - Criticism - timing - get on with it
ACP - Process - Request follow up consultation
ACP - Process - Request ongoing engagement
ACP - Process - Suggestion
ACP - Process - Suggestion - apply Airspace Consultation Proposals
ACP - Process - Suggestion - continued engagement
ACP - Process - Suggestion - further consultation
ACP - Process - Suggestion - further publication
ACP - Process - Suggestion - general/other
ACP - Process - Suggestion - listen to public opinion
ACP - Process - Suggestion - new methodology
ACP - Process - Suggestion - query
ACP - Process - Support
Expansion / Heathrow only
*A - International comparison
*A - Object/oppose - Additional flights
*A - Object/oppose - Additional runways/expansion
A - Airport - Freight only/airport specialisation
A - Airport - Less populated area
A - Airport - Luton - object/oppose
A - Airport - Luton - prefer
A - Airport - Manchester - prefer
A - Airport - Midlands
A - Airport - New airport
A - Airport - Northern airports
A - Airport - Northolt RAF
A - Airport - Oppose any airport expansion
A - Airport - Other
A - Airport - Regional airports
A - Airport - Stansted - prefer
A - Airport - Thames Estuary - prefer
A - Airport - Thames Estuary - reason
A - Airport - Oppose any airport expansion
A - Alternative - Improve airport surface access
A - Alternative - improve inter-airport transport links
A - Alternative - Invest in green technology
A - Alternative - Rail

A - Alternative - Rail - high speed rail
A - Alternative - Reduce demand
A - Alternatives - Other transport links
A - Consider alternatives
A - Support expansion in general
AP - E - Environment - priority
AP - E - Sustainability - priority
AP - G (suggest)
AQ - General - Needs to improve AQ before expansion
AQ - General - Support AQ improvement in general / AQ is important
AQ - General - Vehicle emissions are main concern
AQ - Compliance - Doubt implementation/monitoring/enforcement will happen
AQ - Compliance - Suggestions
AQ - Current - AQ already a problem (general)
AQ - Current - Targets not being met/problem not being addressed
AQ - I - Expansion will make it worse
AQ - I - Expansion will make it worse - construction
AQ - I - Health - asthma/respiratory conditions
AQ - I - Health - deaths/loss of life
AQ - I - Health - on children/future generations
AQ - I - Increased traffic/congestion
AQ - I - Vehicle emissions are the problem/main concern
AQ - M - AQTargets - apply EU standards
AQ - M - Greener aircraft - ban older/more polluting/accept new only
AQ - M - Greener aircraft - suggestions
AQ - M - Inadequate - AQ mitigation incompatible with expansion
AQ - M - Inadequate/can't trust - because of current level of air pollution
AQ - M - Low emission vehicles - insufficient/won't work
AQ - M - More info/detail
C - Agree need but not Heathrow
C - Agree need but not populated area
C - Agree need but not South East
C - Disagree/challenge need for additional capacity in SE
C - Disagree - Climate change
C - Disagree - health/quality of life impacts
C - Disagree - noise/air pollution
C - Disagree - Safety/security
C - Disagree - too much focus on London/SE
C - Cap - Challenge - larger/efficient planes
C - Cap - Challenge - less of priority
C - Cap - Challenge - puts business before people
C - Cap - Challenge - underused capacity/Heathrow not full

C - Demand - Challenge - Brexit will reduce/change demand
C - Demand - Challenge - Doubt forecasts
C - Demand - Reduce through taxes/price
C - Demand - Remove Air Passenger Duty
C - Demand - Should not grow/reduce air travel
C - Disagree/challenge need for additional capacity in SE
C - Econ - Challenge - favours SE/London
C - Econ - Challenge - too expensive/costs outweigh benefits
C - Econ - Challenge - too focused on economy/profit
C - General - Air tech will improve
CE - General - CE is a concern / support CE mitigation in principle/general
CE - I - expansion incompatible with targets/reducing CE
CE - M - Inadequate/insufficient/will not work (no reason given)
CP - Material - N - info omitted/not presented
CP - Material - Criticism - assessment flawed/data or methodology inaccurate
CP - Material - Criticism - Info - Gen. Environment
CP - Material - Criticism - insufficient info/detail NON SPECIFIC
CP - Material - Criticism - leaflet bias/problems
CP - Material - Criticism - too complex/badly written
CP - Material - Criticism - wording/tone (including 'leading questions')
CP - materials - NPS - airspace impacts
CP - Materials - NPS - include new info
CP - Process - Criticism - accessibility/complexity
CP - Process - Criticism - Airport Commission/Howard Davies
CP - Process - Criticism - don't prioritise vocal minority/many support scheme
CP - Process - Criticism - doubt of Government Commitment/implementation
CP - Process - Criticism - general
CP - Process - Criticism - government
CP - Process - Criticism - Heathrow/Heathrow Conduct
CP - Process - Criticism - locals oppose expansion
CP - Process - Criticism - no flight path info/want info
CP - Process - Criticism - 'no third runway' pledge
CP - Process - Criticism - opposition ignored
CP - Process - Criticism - predetermination
CP - Process - Criticism - rushed/not enough time
CP - Process - Criticism - too much focus on money/business
CP - Process - Criticism - unfair influence for Heathrow/Vested interests
CP - Process - other comment
CP - Process - Suggestion - continued engagement
CP - Process - Suggestion - general
CP - Process - Suggestion - listen to public/community
CP - Process - Suggestion - query
CP - Process - Support - in general

CP - Process - Support - NPS specific
CP - Process - Criticism
G - General - Object/oppose/not best way (no reason given or stand-alone statement)
G - General - Support/prefer/best way (no reason given or standalone statement)
G - object - Impacts - environmental concerns
G - object - Impacts Local - cultural heritage
G - object - Impacts Local - local impacts
G - Support / prefer - Competition - dual hub
G - Support / prefer - Competition - leaving EU/staying competitive
G - Support / prefer - Econ - cost/price reasons
G - Support / prefer - Econ - economic benefits
G - Support / prefer - General - because oppose LHR
G - Support / prefer - General - geographical location
G - Support / prefer - Impacts - less health impact
G - Support / prefer - Impacts - less noise impact
G - Support / prefer - Impacts - less populated/fewer people affected
G - Support / prefer - Infrastructure - surface access advantages
G - Support / prefer - less air quality issues
H - Chose to live there
H - General - Object/oppose
H - General - Object/oppose (no reason given or stand-alone statement)
H - General - Suggestion
H - General - Support with caveats - employment strategy
H - General - Support with caveats - housing requirements
H - General - Support with caveats - improve surface access
H - General - Support with caveats - measures enforced/reduce impact
H - General - Support with caveats - protect domestic flight routes
H - General - Support/prefer (no reason given or stand-alone statement)
H - Object - Capacity - general
H - Object - Capacity - resilience
H - Object - Capacity - too busy/congested airspace
H - Object - Competition - reasons
H - Object - Econ - compensation highlights impact
H - Object - Econ - consider cargo
H - Object - Econ - cost concerns
H - Object - Econ - don't prioritise economics
H - Object - Econ - economic impact (general)
H - Object - Econ - foreign owners/private company
H - Object - Econ - general (economic benefits too low/will not happen)
H - Object - Econ - hub argument
H - Object - Econ - job creation
H - Object - General - broken promises/commitments

H - Object - General - legal issues/implementation problems
H - Object - General - location unsuitable (general)
H - Object - General - location unsuitable/urban pop
H - Object - General - other more suitable sites
H - Object - General - other reasons
H - Object - Impacts - air quality
H - Object - Impacts - climate change
H - Object - Impacts - environmental concerns
H - Object - Impacts - future expansion
H - Object - Impacts - future generations
H - Object - Impacts - health concerns
H - Object - Impacts - location unsuitable (general)
H - Object - Impacts - many people affected/densely populated
H - Object - Impacts - noise
H - Object - Impacts - pollution (general)
H - Object - Impacts - quality of life
H - Object - Impacts - safety/security
H - Object - Impacts Local - community impacts
H - Object - Impacts Local - construction/disruption
H - Object - Impacts Local - cultural heritage
H - Object - Impacts Local - destroying homes/buildings
H - Object - Impacts Local - flight paths over city
H - Object - Impacts Local - housing/public services (overcrowding)
H - Object - Impacts Local - local impacts (general)
H - Object - Impacts Local - local opposition/public opinion
H - Object - Impacts Local - SA local impacts
H - Object - Impacts Local - SA to Heathrow
H - Object - Infrastructure - issues
H - Object - Infrastructure - no space
H - Object - Infrastructure - surface access issues
H - Object - Preference - passenger user
H - Object - Suggestions - postpone until quieter aircraft developed
H - Support / prefer - Capacity - capacity needed
H - Support / prefer - Competition - to compete with European hubs
H - Support / prefer - Competition - leaving EU/stay competitive
H - Support / prefer - Competition - remain competitive/international standing
H - Support / prefer - Competition - to compete with European hubs
H - Support / prefer - Econ - boost growth/revenue
H - Support / prefer - Econ - economic benefits (general)
H - Support / prefer - Econ - local
H - Support / prefer - Econ - national interest/national economic interest
H - Support / prefer - General - benefits outweigh impacts
H - Support / prefer - Impacts - good for London/as capital city
H - Support / prefer - Jobs - job creation

I - Costs
I - Jobs
I - Quality of Life
I - Surface access - predicted impacts
LC - General - Support compensation in principle/general (not related to proposed measures)
LC - Measures - Can't/Don't compensate for noise/lost sleep
LC - Measures - Inadequate/insufficient/will not work (no further comment)
LC - Measures - More info/detail
LC - Costs/funding - Tax/fine to compensate / polluter pays
LC - Costs/funding - Who pays
LC - Criteria - Area not large enough/many affected outside proposed zone
LC - I - Environment
LC - I - Health
LC - I - Property prices/Housing market
LC - I - Quality of life
LC - M - Comp purchase/125% - Challenge
LC - M - Suggestion
LC - Other comment
N - Assessment - Challenge noise metrics/contours/dB
N - Assessment - Challenge use of average noise levels
N - Assessment - Priorities at different altitudes
N - Assessment - Suggestions
N - Compliance - Doubt monitoring/enforcement - LHR already breaks rules
N - Compliance - Doubt monitoring/enforcement (general)
N - Compliance - Night flights - strict enforcement
N - Compliance - Suggestions - fines/penalties/tax (dis)incentives
N - Compliance - Suggestions - limits/targets/monitoring
N - Consultation - Information request / question
N - Current - Aircraft ground noise
N - Current - Noise is already a problem (general)
N - Current - Noise is already a problem (night flights)
N - Flight paths/vectoring/conc - Concern
N - Flight paths/vectoring/conc - Dispersion vs. concentration
N - Flight paths/vectoring/conc - Low flying aircraft
N - Flight paths/vectoring/conc - Steeper take-off/descent
N - Flight paths/vectoring/conc - Suggestions
N - General - Noise is a concern / support noise mitigation in principle/general
N - I - Additional traffic noise
N - I - Densely populated area
N - I - Green spaces/leisure/heritage
N - I - Health/Quality of life
N - I - Natural environment/wildlife/habitat

N - I - Noise will decrease
N - I - Noise will increase (general)
N - I - Noise will increase (new areas/people affected)
N - I - Schools/Children
N - M - Alternation/respite - half a day (current arrangement/no reduction)
N - M - Alternation/respite - inadequate respite/Oppose proposals
N - M - Alternation/respite - suggestions
N - M - Alternation/respite - support
N - M - Inadequate - noise mitigation incompatible with expansion
N - M - Inadequate/insufficient/will not work (no reason given or standalone statement)
N - M - Insulation - inadequate - doesn't solve problems outside/don't want to live in a sealed home
N - M - Night flights restriction - 11-6 (7 hours total)
N - M - Night flights restriction - 11-7 (8 hours total)
N - M - Night flights restriction - 8 hours (no times given)
N - M - Night flights restriction - Insufficient/extend (general/need more sleep) - no times suggested
N - M - Night flights restriction - other times or hours (specific suggestions)
N - M - Night flights restriction - late/delayed flights
N - M - Night flights restriction - oppose proposals
N - M - Night flights restriction - suggestions
N - M - Night flights restriction - support in general
N - M - Night flights restriction - support proposals
N - M - Night flights restriction -will increase
N - M - Noise will increase (general)
N - M - Quieter aircraft - already happening
N - M - Quieter aircraft - insufficient
N - M - Quieter aircraft - offset by having more of them
N - M - Quieter aircraft - will/might not happen/challenge evidence
N - M - Support with caveat
N - S - Expansion - object - on noise grounds
N - S - Heathrow - object - on noise grounds
N - S - Other airport - prefer - on noise grounds
N - Suggestions - Housing policy
N - Suggestions - Independent noise ombudsman/commission
N - Suggestions - Other (general/other)
N - Suggestions - Other (policy/procedure/rules)
N - Suggestions - Reduce noise before expanding
PR - Requirement (General) - need to be strict
PR - Requirement (other) - environment (type not specified)
SA - Bus - Existing congestion/issues
SA - Financial concerns - More details requested

SA - Financial concerns - Suggestions
SA - Financial concerns - Taxpayers/hidden costs
SA - Gen - Congestion concerns
SA - Gen - Contingent upon X
SA - Gen - Distrust in Government/H - vagueness
SA - Gen - Distrust in Government/H capabilities
SA - Gen - Distrust in H capabilities
SA - Gen - Improve surface access before expansion
SA - Gen - Plans ineffective/unconvincing
SA - Gen - Suggestions
SA - Impacts - Economy
SA - Impacts - Pollution - AQ Concerns
SA - Public transport - Currently inadequate
SA - Public transport - Improve service
SA - Public transport - Public transport access only/as priority
SA - Public transport - Support Targets/Sustainable modes
SA - Public transport - Targets Insufficient/absolute car use will increase
SA - Rail - Existing issues/concerns
SA - Rail - Improve access and services
SA - Rail - Level Crossing
SA - Rail - Prioritise
SA - Rail - Suggestion.
SA - Rail - Suggestion. - National rail links
SA - Rail - Support SW links
SA - Roads - Congestion concerns
SA - Roads - Existing congestion/issues
SA - Roads - Freight - Congestion concern
London City Airport - LCY
*LCY - Oppose expansion/development
*LCY - Support expansion/development
LCY - Airport expansion - Alternative suggestion
LCY - Airport location - Alternative suggestion
LCY - Airport location - Concern/criticism
LCY - Benefits of LCY concentration/changes
LCY - Combination of LCY and LHR planes
LCY - Compensation - Suggestion for breaching rules
LCY - Compliance - Stricter controls
LCY - Compliance - Suggest an Independent Noise Authority
LCY - Current practice - Concern/criticism
LCY - Did not consult properly/effectively
LCY - Equity concerns
LCY - Flight paths - Criticism
LCY - Flight paths - Suggestion
LCY - Industry vs communities

LCY - Info/detail request
LCY - Intervention/change requested
LCY - Misleading information/noise impacts worse than predicted
LCY - Past mitigation measures - Concern/criticism
LCY - Routeing suggestion
LCY - SofS call-in function - Suggestion

Appendix C: Comments on the draft Airports NPS consultation raised in responses to the UK Airspace Policy consultation

Introduction

In their responses to the UK Airspace Policy consultation (which ran in parallel to the draft Airports NPS consultation), many respondents commented on issues that relate to the consultation on the draft Airports NPS.

The majority of these comments relate to the proposed expansion of Heathrow - more specifically the preferred Heathrow Northwest Runway scheme.

For the most part, the issues raised in relation to the draft Airports NPS consultation reflect those discussed in responses to that consultation. Issues discussed by respondents include:

- the case for airport expansion;
- support and opposition to expansion at Heathrow, including the preferred Heathrow Northwest Runway scheme;
- expansion at Gatwick airport as an alternative to Heathrow;
- other alternatives to the proposed third runway at Heathrow and to airport expansion generally; and
- the consultation process.

All of the themes covered above are discussed in detail in the summary report of responses to the draft Airports NPS consultation.

Other issues raised in relation to the draft Airports NPS consultation

Within responses to the UK Airspace Policy consultation, only two issues raised in relation to airport expansion and the preferred Heathrow Northwest Runway scheme relate to topics that are not covered in the main summary report. These are:

- the application of Performance Based Navigation to flights from Heathrow Airport; and
- additional flights.

Application of Performance Based Navigation at Heathrow Airport

One respondent expresses concern with regards to how Performance Based Navigation (PBN) will be applied at Heathrow Airport. They comment that although, in general, PBN offers the opportunity to reduce overflight by routing over less densely populated areas, that the opportunities to do this near Heathrow are very limited, due to London's high population

density. They feel that attempting to reduce overflight of the population near Heathrow Airport might result in routing over parks such as Richmond Park, Old Deer Park (a World Heritage Site) and Kew Gardens – all of which are seen as areas valued for their tranquillity. It is suggested that millions of annual visitors will be adversely affected if PBN is used to route flights over these parks.

Additional flights and the potential impact on airspace

A few respondents express concern about the impact of extra flights from the proposed Heathrow Northwest Runway scheme, commenting that there may be insufficient airspace available to accommodate the flights, or that the extra flights might impact on Gatwick's airspace. Another respondent expresses support for the current operating restriction capping Heathrow flights at 480,000 per year and argues that it is important this is maintained.

Summary report of consultation feedback

Appendix D: Comments on the UK Airspace Policy consultation raised in responses to the draft Airports NPS consultation

Introduction

Some respondents submitted comments to the consultation on the draft Airports that are directly relevant to the Government's parallel consultation, 'UK Airspace Policy: A framework for balanced decisions on the design and use of airspace'. These comments are summarised in this appendix of the report.

Most of these comments relate to topics which are covered in the summary report for the UK Airspace Policy consultation. The topics respondents comment on with regards to the UK Airspace Policy proposals include:

- the proposed noise assessment metrics;
- options analysis, including the appraisal of impacts with regards to concentration and dispersion and altitude based priorities;
- the proposed Independent Commission on Civil Aviation Noise (ICCAN);
- the competent authority proposals for ongoing noise management;
- the airspace change compensation proposals; and
- the need for airspace modernisation.

A few of the issues raised in relation to these topics are not mentioned in the UK Airspace Policy Consultation Summary Report. These are summarised at the end of this appendix.

In addition, some respondents also comment on the interaction of the two consultations – both in terms of the consultation process and the proposals put forward in each.

Comments on the interaction of the two consultations

In terms of the overall UK Airspace Policy consultation process, one member of the public expresses general support for the Airspace Policy consultation. However, another member of the public questions the process, commenting that they feel that the Airspace Policy consultation was poorly advertised, and that the perceived dominance of the draft Airports NPS consultation obscured the proposals in the Airspace Policy consultation, leaving, in their opinion, many people unaware of it.

A few respondents make more detailed comments regarding the interaction between the proposals in the Airspace Policy consultation and those in the draft Airports NPS consultation. Most comment that some or all of the proposals in the Airspace Policy consultation should be applied to the draft Airports NPS proposals, and hence that running the two consultations concurrently is illogical. Most respondents do not specify exactly which airspace proposals they

wish to see applied to the draft Airports NPS, but a small number do comment that the proposals regarding the assessment of noise (Chapter 5 of the Airspace Policy consultation document) should have been applied to the draft Airports NPS before consulting on it.

“Given that the Government’s consultation on Airspace change acknowledges a need to re-assess the measure of noise nuisance, the assessment used as the basis for the NPS consultation could also be considered as out of date.”

(Local authority, User ID 131471)

With regards to the compensation changes proposed in Chapter 4 of the Airspace Policy consultation document, a community group and a business umbrella body both express concern at the possible increased costs which would result from the compensation proposals in addition to those proposed in relation to expansion at Heathrow.

As in responses to the Airspace Policy consultation, a number of respondents express concern that, as proposed, ICCAN will lack credibility as a result of not being seen to be independent and of lacking regulatory and enforcement powers. As a result of these perceived shortcomings of ICCAN, a small number of respondents express concern as to the lack of influence that communities will have over a potentially expanded Heathrow and its impacts.

“This is important for Heathrow expansion, because without an independent arbiter with real power over the airport’s operations, local communities would have little faith that the fundamental noise issues arising from an expanded Heathrow would ever be addressed.”

(Local authority, User ID 144084)

With regards to airspace modernisation in general, one airline comments that modernisation of airspace is necessary in order for Heathrow to expand, describing it as a key element of expansion.

Other comments on the Airspace Policy proposals

Assessing noise in airspace decisions

With regards to options analysis (Chapter 5 of the Airspace Policy consultation document) as a means of informing decisions on concentration and dispersion, one statutory body expresses support for minimising impacts on communities and providing respite where possible. However, they go on to imply a preference for concentration over dispersion, referring to concentration changes by London Luton Airport as constituting ‘best practice in this area’.

ICCAN

A number of suggestions are put forward with regards to the ICCAN proposals:

- that it be run by a body independent of the aviation industry, such as the Cabinet Office;

- that its remit should include control over runway alternation, respite and night flights; and
- that it should impose ‘appropriate conditions’ on the developer, in conjunction with the Secretary of State as competent authority in the determination of any associated Development Consent Orders.

Airspace modernisation

Aside from the need to accommodate expansion at Heathrow, other reasons given for supporting airspace modernisation include that current policies and procedures regarding UK airspace are seen as outdated and because the existing framework is seen as incompatible with modern practices, such as Performance-Based Navigation.

One local authority requests that airspace modernisation includes speeding up the process by which airspace changes are made, in order to make it easier to make changes which will positively impact its residents.