



Incorporating Stop Stansted Expansion

Stansted Airport Watch welcomes the opportunity to respond to the Civil Aviation Authority's (CAA) review of the CAP1616 Airspace Change Process and provides the following comments:

1. In our view, the 2013 Aviation Policy Framework (APF) is out of date and is effectively a policy vacuum with regard to adverse environmental impacts for local communities, particularly adverse noise impacts. The CAA is therefore unfortunately ill-equipped to adequately implement the Airspace Modernisation Programme and thoroughly evaluate Airspace Change Proposals (ACPs) with respect to community interests. CAA should identify policy gaps and where greater clarity is needed from the Department of Transport.
2. Communities should be involved in the preparation of the Statement of Need by ACP sponsors to ensure that the outcomes of ACPs provide an equitable balance of community and industry benefits.
3. The CAA's current position that noise improvements should only be evaluated "*where they are not in conflict with growth*" continues to be a major obstacle to the achievement of a balanced outcome. The extant APF explicitly says that "*industry must continue to reduce and mitigate noise as airport capacity grows*". In this situation, it should be a pre-requisite that ACPs should reduce aircraft noise impacts on local communities
4. Noise and other environmental dis-benefits should be thoroughly assessed and ACP sponsors should provide evidence of the factors and weighting criteria used when balancing community and industry benefits and impacts.
5. The number of Stages, Steps and Gateways in CAP1616 appear about right in being a sufficient number to ensure a thorough appraisal of ACPs but at the same time not being an obstacle to implementing airspace and environmental improvements in a timely manner.
6. The CAA has not implemented its communications portal to allow full dissemination of information and data. This should be rectified.
7. As part of the process, Public Evidence Sessions are essential. Furthermore, due to the technical complexity of airspace changes, the CAA should ensure communities living around airports and under current and potential flight paths have access to independent advice during CAP 1616 processes including access to modelling tools such as NATS COMP-AIR. This may also be the case for local government authorities.
8. ACP consultations should meet ICCAN published best practice.
9. ACP consultations should clearly identify inter-dependencies where neighbouring airports share the use of airspace below 7.000ft and demonstrate how conflicts are proposed to be resolved, particularly for noise. In this respect, it is difficult to see how CAP1616 can operate effectively until the FASI-S Master Plan has been published with the involvement of the Airspace Change Organising Group.
10. The process for Post Implementation Reviews (PIR) should ensure that environmental objectives, particularly noise reduction, are properly assessed and achieved. Previously, PIRs concentrated on whether the outcome of the aircraft tracks and trajectories achieved the ACP operational objective to the disadvantage of community benefits.
11. In particular, we point out that for the Stansted Airport PIR for LAMP Phase 1A, Module A in 2017, the CAA stated '*There are unlikely to be any adverse, tranquillity or visual intrusion impacts as a direct result of these changes*'. No evidence was

produced to support this assertion. The outcome was that the Clacton departure routes more than doubled the intensity of overflights. More people suffered an increase in daytime overflights compared with the number of people where Dover (now Detling) daytime overflights had been removed. CAA also stated '*We have also concluded that we anticipate there will be no net increase in the number of people overflown below 4,000ft AMSL*'. This ignored the fact that below 4,000ft, while 1,470 fewer people would be overflown, 2,400 people would be overflown more intensively. The communities living around Stansted Airport had no confidence that the 2017 PIR was carried out fairly. CAP1616 should ensure that a fair and equitable balance is achieved for PIRs.

Stansted Airport Watch  
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