

## AIRCRAFT NOISE ACTION GROUP

### CAA post implementation review:

#### Newcastle International Airport Airspace Change Proposal: SID & OMNI Departures: April 2014

These views are being submitted by Aircraft Noise Action Group (ANAG). ANAG is formally constituted as an unincorporated association. ANAG was set up to campaign for changes in the management of departure flightpaths in particular at Newcastle International Airport (NIAL) following the implementation early in 2017 of the ACP submitted and approved by the CAA in 2014. The effect of that implementation is described in the submission below. ANAG has a signed up membership of supporters in the North East of England living under or close to Newcastle Airport flight paths and the views below are being submitted on their behalf.

Further information on ANAG is available at <https://www.aircraftnoiseaction.com>

### A. Introduction

In this submission, we will look at:

- The aims of the ACP submitted by Newcastle Airport in 2014
- The extent to which we think these have been met
- The collateral effects of its implementation
- The benefits and costs of its implementation

We will also look at the **process** surrounding the approval and implementation of the ACP and the extent to which this might have led to issues arising after implementation and which are properly part of this review. In particular, we will identify outcomes we believe are owned by either NIAL and/or by the CAA.

We will reference the original proposal as submitted by Newcastle Airport in 2014 as well as Environmental, Operational and Consultation assessments carried out by the CAA on the ACP.

### B. Justification

1. The justification for the changes proposed by NIAL are found on Page 3 of the main proposal under “**A: Justification for the change and Analysis of the change options**”. The principal aims appear to be to align NIAL with the Single European Skies Project and to deliver “economic and climatic benefits”. The latter two benefits do not appear to be detailed or quantified in the proposals so it would be difficult to say whether either had been met post implementation – especially the climatic benefits.

However, NIAL has produced an Airport Land use Masterplan to a 2035 horizon which is predicated on a large increase in aircraft movements. We take the view that, post implementation, this conflicts with even the generalised and unsubstantiated (as commented on by the CAA in its own Environmental

assessment of the ACP) climatic benefits. A Masterplan, if rolled out with this growth objective would be a major post implementation failure.

There is some technical detail in the ACP on the extent to which the changes might reduce the work load on ATC staff at NIAL and, possibly, reduce the number of ATC staff required to support the operation. ATC staff are costly and scarce. We don't know whether NIAL has reduced its ATC establishment as a result of these changes but, if it has and if the operational level has been maintained within the Aerodrome Licence requirements that regulate its delivery, then it might be possible to say that one narrow economic benefit has been secured post implementation. But, we don't know and the PIR documentation does not say.

2. However, there is another key stated aim of the ACP in **Section E. Economic Impact** of the ACP on page 19:

***“Economic Impact: An economic impact has not been conducted as the purpose of the introduction of SIDs and OMNIs is to reduce costs to airlines.***

*There is no perceived negative economic impact.”*

We think this statement is key, is strategic by nature and should have led the ACP rather than being hidden in the depths of the document. It is a clear and unequivocal statement of an empirically measurable benefit of considerable direct and indirect significance to NIAL.

We do not understand why an “economic impact” (*we assume that this means an economic impact assessment*) was not carried out. Reducing costs to airlines through flight path and other changes would help maintain the Airport as an attractive commercial proposition to them. This would surely have had an impact on Airport's revenue and therefore the economics of the Airport.

So, the impact on the Airport's business and economics cannot be assessed post implementation, as there is no baseline to compare with.

Similarly, NIAL does not appear to have provided information for the PIR related to airline cost savings. Thus any assessment of this strategic objective post implementation is not possible

We also don't understand the use of the word “perceived” in the statement *“There is no perceived negative economic impact”*. Nothing can be perceived until it has happened. We think that that the word “expected” should have been used. In any event, in the absence of a baseline economic impact assessment and/or data, nobody can say whether there have been any positive or negative financial impacts for NIAL or anybody else.

### **C. Airspace and operational changes and impacts**

1. A core objective of the ACP was to secure approval for the implementation of satnav in the management of aircraft movements departing from the Airport. As indicated earlier, it was expected by NIAL that this would yield operating and cost efficiencies (unsubstantiated as commented on by the CAA) to the Airport in terms of ATC resources and to the airlines presumably in terms of fuel burn.

However, the CAA commented in its assessment of the ACP that claims of future CO2 and fuel burn reductions were not validated in the proposal. Again, any assessment of the post-implementation achievement of these objectives is simply not possible.

2. The change to satnav has meant that aircraft now fly up to 1 mile either side of the revised departure flight path centre line where, pre-implementation, they flew up to 5 miles either side of this.
3. It was clear at the time the ACP was submitted and it remains clear post-implementation, that the airspace around NIAL is not crowded, it is nowhere near capacity. In any event, the long term trend in aircraft movements from and into NIAL is downward (it currently has the lowest number of ATMs for 10 years a decline of 26% from 2008 to 2017), so for this reason as well, the use of satnav can not be related to an airspace capacity issue. It is a cost saving change and NIAL has clearly stated this (see **B2** above).
4. The effect of this concentration of departing aircraft down a narrowed flight path has been, post implementation, to increase the noise impact for a significant number of residents and communities living under or close to the flight path centre lines. Following the 2017 ACP implementation, aircraft noise has become a major issue where previously over many years before 2017 and with a larger number of ATMs, noise was not a major issue. Prior to implementation, the wider lateral dispersal of departing aircraft meant that noise events were a lot less frequent and that, while occasional noisy aircraft events did occur, the overall noise experience was tolerable because noise was shared and a lot less frequent.
5. In effect, the use of satnav managed narrow flightpaths has increased the scale of negative noise events impacting on residents where the expectation would conventionally be that overflying a smaller number of people might reduce the noise impact. This latter expectation has demonstrably not been met. **This noise increase arising from the approval and the use of satnav is a key negative post-implementation impact.**
6. The CAA commented, in its own Environmental Assessment of the ACP, that NIAL had failed to take any account of the expected increase in frequency of noise events for residents under and close to the centre lines of satnav managed narrow flightpaths. Because it did not do this, NIAL could not and did not, during what was an inadequate and flawed consultation process, inform residents that noise levels and frequency would increase across large parts of communities around NIAL. Had prospective consultee organisations known of this and if the vast number of individual residents under or near to the flightpaths been informed of this likely effect, it is highly likely that there would have been significant opposition to the proposal. **This failure to inform during the consultation is a key driver of the post-implementation increase in negative noise impact. It also calls into question the basis for the CAA's approval of the ACP.**

## D. Conclusions

1. Aircraft noise has become a major problem since the implementation of this ACP.
  2. The ACP documentation as submitted by NIAL in 2014 was clearly deficient in a number of key areas. In ANAG's view, this was insufficiently challenged by the CAA, the ACP should not have proceeded on the basis of the documentation provided at the time.
  3. The post implementation documentation submitted recently by NIAL is similarly deficient and of poor quality with minimal content. It is missing key data with which the implementation of the ACP might be adequately assessed and does not reference meaningfully to the original ACP objectives. It consists mainly of PowerPoint presentation slides.
  4. The ACP was approved in spite of significant negative comments in CAA assessments about the absence, in the submission, of information about the effect of the use of narrow flightpaths on noise levels on the ground.
  5. Further, the ACP was approved following a public consultation process which has to be regarded as a failure not just because of its lack of reach and scope but because of the absence of key noise information.
  6. NIAL suggested in the ACP that there would be environmental impact gains from its implementation. The CAA commented, in its Environmental Assessment, that none of these suggest gains was supported by hard evidence. Given that there are no valid environmental targets in the ACP, it is not possible to say, post implementation, that there have been any gains (or losses) at all in this area.
  7. **So, ANAG is of the view that both NIAL and the CAA own responsibility for the negative impacts of this ACP post-implementation.** We think that its approval should be reviewed urgently as a post-implementation action. We think this is justified for the reasons explained in this submission.
  8. We also think that, in comparison with the recent refusal to approve an ACP submitted by Leeds/Bradford Airport, where the CAA's assessments reported issues of similar or lesser severity than those reported for NIAL's 2014 ACP, that the latter was not properly assessed by the CAA with the consequences that we now see following its implementation.
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