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The Lord Ahmad of Wimbledon
Transport Minister for Aviation, International Trade and Europe
Department for Transport
33 Horseferry Road
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29 November 2016

Dear Lord Ahmad

Thank you for meeting us recently.

We were grateful for the opportunity to exchange views on some of the important matters to be addressed in your consultation on the airspace and noise aspects of the Aviation Policy Framework in the New Year. We hope our meeting will be the beginning of a fruitful dialogue between the government and communities, leading to significant and sustained reductions in aircraft noise together with improvements in the arrangements for measuring and assessing impacts and regulating that noise. We would welcome an opportunity to discuss your proposals in detail once they've been published. Perhaps we could take you up on your interest in visiting some of the areas impacted by aircraft noise to do so in the New Year? Communities would certainly appreciate that.

We are writing to reiterate a number of points touched on at our meeting. Although this letter is from the five of us, the community groups listed below have all endorsed it.

Noise is the primary concern of communities, both near airports and under flight paths often many miles from airports. We were therefore encouraged to hear that your consultation will propose new arrangements for measuring and assessing the impacts of aircraft noise, including the threshold at which significant community annoyance is considered to commence. The current metrics have not been fit for purpose for many years. The under-reporting of noise that they have caused has distorted decision-making and become an obstacle to sensible discussion on policy change. It is widely acknowledged that they must now be replaced with a suite of metrics, including noise events, which accurately reflect the way aircraft noise is experienced and perceived by people around airports and under flight paths. Community groups are keen to work with you and your officials both to agree a new set of metrics and to determine how they should be used in policy formulation, noise reporting and to guide decisions on flight paths.

We were also encouraged by your confirmation that government policy will no longer promote concentration of aircraft and aircraft noise. The recent concentration of flight paths and associated redistribution of noise around several major UK airports, justified by reference to current government policy has caused great distress and anger in communities. We look forward to a clear statement that the government supports the dispersion of aircraft, or respite arrangements, adapted to local circumstances, provided such arrangements do not expose new communities to aircraft noise.

We are, however, very concerned that your proposals for the future regulation and governance of the aviation industry will not go far enough.

It is absolutely clear that the present regulatory arrangements for reducing aircraft noise, overseen by the government, are inadequate. The absence of a person or body with clear accountability for reducing noise is a fundamental failing of the current structure. Relying instead on airports, whose commercial objectives are served by maximizing aircraft numbers, to self-regulate noise is no longer credible. Many years of policy slogans, talking shops and toothless initiatives have failed, with the result that there are now more complaints and many more active aviation community groups than at any time in living memory. More of the same will not be acceptable to communities.

What is now required is an independent noise regulator with the remit and powers to drive and if necessary enforce sustained reductions in noise, to levels recommended by the WHO, at all major airports. Regulation of this sort is well established in other sectors and could readily be applied to aviation. Those arrangements include appropriate checks and balances to ensure safety is not compromised and to have regard to the commercial interests of the sector; neither can be a reason for the government to fail to act. We noted with interest the idea of "legally binding noise targets" in the Secretary of State's speech to Parliament announcing the government's decision on runway capacity in the South East. We believe this could be one strand of more effective future regulatory arrangements. More broadly we seek a collaborative effort between the Government, the aviation industry and communities affected by aircraft noise, backed by firm regulation, to set requirements and timetables for noise reduction including an equitable share of the benefits from less noisy aircraft.

In relation to the governance of airspace changes, current law and CAA processes have allowed the industry to make major changes impacting the lives of hundreds of thousands of people without notification, consultation or consent. That simply cannot be allowed to continue. We are aware that you are considering proposals to widen the definition of an airspace change to include permanent and planned redistribution of the use of airspace, and we believe that would be a helpful first step. But more fundamental changes will also be required. If there is to be airspace modernization it will need to be accompanied by changes in the law to set aviation in a modern legal context properly accountable for the noise and health impacts it causes. There will also need to be clarification of - and if necessary change in - the CAA's duties so that all parties fully understand the basis on which it will take future decisions on the use of airspace, together with appropriate protections for communities and arrangements for them to appeal decisions.

In order to illustrate the matters raised in this letter we propose to send you a number of case studies prepared by different communities around the country. These could form a useful basis for testing the emerging new policy framework. We would also be happy to expand on any of the points raised in this letter if that would be helpful. In any event we look forward to further opportunities to discuss them and your other proposals once your consultation has been published.

Yours sincerely,

Dougie Greenhalgh (Edinburgh Airport watch)
Charles Lloyd (Aviation Communities Forum)
Martin Peachey (Stop Stansted Expansion)
Brendon Sewill (Gatwick Area Conservation Campaign)
Peter Willan (Richmond Heathrow Campaign)

Endorsed by:

Airport Watch
Aircraft Noise 3 Villages
Association of Parish Councils Aviation Group
Aviation Communities Forum
Back Ifold Plaistow and Loxwood against Noise and Emissions
Communities Against Gatwick Noise and Emissions
Edinburgh Airport Watch
East Sussex Communities for the Control of Air Noise
Gatwick Area Conservation Campaign
Gatwick Obviously Not
Heathrow Association for the Control of Aircraft Noise
HACAN East
High Weald Councils Aviation Action Group
Pulborough Against Gatwick Noise and Emissions
Residents Against Aircraft Noise
Richmond Heathrow Campaign
Speldhurst Against Gatwick Noise
Stop Heathrow Expansion
Stop Stansted Expansion
Teddington Action Group
Tunbridge Wells Anti Aircraft Noise Group

cc:

Rt Hon Chris Grayling MP, Secretary of State for Transport
Louise Ellman MP, Chair, Transport Select Committee
Dame Deirdre Hutton, Chair, Civil Aviation Authority
Andrew Haines, CEO, Civil Aviation Authority