

CAP 1984 ANNEX D

CAA analysis of stakeholder feedback and complaints data regarding the Newcastle Post Implementation Review of the GIRLI SIDs

Introduction

1. For the Post Implementation Review (PIR) the change sponsor was required to demonstrate how the actual impacts of the airspace change compare with what was set out in the airspace change proposal and the preferred option on which stakeholders were consulted. Irrespective of the fact that the decision for the Newcastle International Airport Ltd. (NIAL) airspace change proposal was made under CAP 725, the PIR has been undertaken by reference to the current process guidance contained within Stage 7 and Appendix H, CAP 1616 Guidance on the regulatory process for changing the notified airspace design. This specifically included the publication of data received from the change sponsor and the opening of a 28-day feedback window via email, during which any stakeholder could provide any feedback on the data received and the impact of the change.
2. There was a slightly longer PIR data collection period from August 2019 to 13 December 2019 following a request from NIAL for an extension to the deadline for their PIR data submission.
3. The change sponsor provided data as follows:
 - Safety data
 - Traffic figures
 - Traffic dispersion/density comparisons
 - Utilisation
 - Operational feedback
 - Stakeholder feedback/complaints received by NIAL relevant to this review
 - Traffic Figures
4. The Change Sponsor's data analysis and documentation was published on the CAA website <https://airspacechange.caa.co.uk/> and stakeholders were invited to submit their own observations by email to the CAA. This feedback survey opened on 13 December 2019 and closed on 27 January 2020.
5. Following a request for NIAL to improve their data presentation, stakeholders were given a further opportunity to provide feedback by email on the updated data in a 28-day window that closed on 18 March 2020.
6. In July 2020 NIAL provided further information at the request of the CAA to resolve figure discrepancies. An additional 28-day window was opened for stakeholder comments and feedback which closed on 4 September 2020.

7. A total of 10 responses were received from individuals and 1 response was received from an unincorporated association namely the Aircraft Noise Action Group (ANAG). One response was received from an airline operator KLM which included some track plots.
8. We have reviewed the feedback received, detailed our findings and provided appropriate comment to the feedback cross-referencing to the main PIR report where appropriate. Our comments to the relevant feedback are below.

Main themes of Stakeholder Feedback

9. The following main themes were identified from respondents' feedback:

(1) The narrow concentration of aircraft departures, compared to wide dispersal prior to the implementation of the airspace change, had led to an increase in noise pollution in terms of noise levels and frequency. Respondents said this had resulted in unbearable noise and visual intrusion for residents and communities living under or close to the flight paths' centre lines. The frequency of flights was referred to as being every 2 to 3 minutes at the peak of summer.

CAA comments: The intent of the ACP was to concentrate aircraft along known routes. The three SIDs as currently designed achieve this aim and as a consequence, at peak times, the noise will also be concentrated below the route. In the ACP, NIAL considered that the villages of Throckley and Heddon-on-the-Wall were the two most noise sensitive areas and as such, the GIRLI 3X and 1Y SIDs were designed to concentrate traffic between them. The track analysis has shown that there is still some tolerable dispersion in terms of design. However, departing aircraft are more concentrated between these villages when flying the GIRLI 3X/1Y SIDs when compared to how westerly departures flew prior to the implementation of the SIDs.

(2) Increased noise impact from early in the morning to late at night. A common theme was an increased and intolerable noise intrusion from flights from early in the morning to night with respondents being woken by the noise of aircraft from 6am (5am in the summer) and being disturbed by flights continuing until midnight (1am in the summer). Reference was made to light aircraft being heard during the night.

CAA comments: Noise impacts in the early morning and late evening/night time is not a matter for the change proposal, nor was this proposal an enabler for increased flights during these periods; this is the responsibility of the appropriate planning authority responsible for the use of Newcastle International Airport Limited and does not form part of the airspace change process.

(3) Impact of increased noise on health and wellbeing, including sleep deprivation and inability to enjoy time outside. Some respondents stated they had suffered stress and that the noise impacted their ability to hold conversations and enjoy homes and gardens. Some residents wished to move home due to the increased noise impact.

CAA Comments: No environmental assessment was completed by NIAL at the time of consultation because no change was expected to noise and environmental impacts. The intention of the change proposal was to replicate the way departing aircraft were routed

by Air Traffic Control, once the Noise Preferential Routes were established. The airspace change proposal was not an enabler for an increased number of flights, and this does not form part of the airspace change process. Any increase in traffic levels is a result of airport planning approvals and is not a matter for the CAA.

(4) Areas affected. Stakeholders referred to the following areas being affected by a significant increase in aircraft noise: Blaydon, Clara Vale, Darrad¹ (*sic*), Darras Hall, Heddon-on-the-Wall and Throckley.

CAA comments: Blaydon is approximately 2.2nm east of the GIRLI 3X centreline and 1.5 nm east of the GIRLI 1Y centreline. Clara Vale is approximately 0.5nm west of the GIRLI 3X centreline. Darras Hall is approximately 0.9nm north of the Waypoint NTW02. Heddon-on-the-Wall and Throckley and have both the GIRLRI 1Y and 3X route between them (see the Track Analysis document Annex B). Given the positions of these villages/towns in relation to the SIDs it would be expected that they experience aircraft noise. However, it has not been possible, during this PIR to consider any increase aircraft noise, as a result of the SIDs being implemented as no noise analysis was done prior to implementation. The purpose of the PIR is to consider if the sampled, relevant aircraft are flying the SIDs as expected and that they are similarly positioned to how they were, prior to the implementation of the SIDs. The track analysis shows this to be the case, with greater concentration along the anticipated routes.

(5) Some respondents have stated that NIAL did not make it clear that aircraft would fly a narrow, concentrated route with noise consequences for communities and that the Airport conducted an inadequate consultation. Respondents stated that the Airport did not consult directly with residents and that the latter first became aware of the airspace change proposal in April 2017 when residents experienced the noise increase.

CAA comments: The consultation document published by NIAL included text and diagrams referencing Precise Area Navigation (P-RNAV). There is a statement that the spread of aircraft on departure would be reduced due to the accuracy of P-RNAV. A supplementary consultation leaflet entitled “Departure Route Consultation” produced by NIAL provided an explanation of the way in which P-RNAV improves track keeping accuracy.

10. The responses from stakeholders included those outlined below.

The narrow concentration of aircraft departing to the west of the Airport has led to an increase in noise pollution in terms of noise levels and frequency:

- Aircraft noise has become a major problem since the implementation of this airspace change proposal
- Since 2017 excessive noise intrusion has increased for more residents than prior to implementation
- The planes take off and immediately level out making no attempt to climb and so are very low
- Departing aircraft are inundating the village of Heddon-on-the-Wall and not actually passing through the gap between Throckley and Heddon-on-the-Wall as constantly portrayed by NIAL

¹ Believed to be a typo, should read Darras.

- Living at least half a mile to the west of the “gap” area yet get 40-60 aircraft departing overhead, or close by, during the winter months and 70-90 during the summer months
- Before the airspace change the overall noise experience was tolerable because noise was shared and a lot less frequent
- The noise increase arising from the approval and use of satnav is a key negative post-implementation impact
- Flight paths are now 1 mile either side of the revised departure flight path centre line compared with 5 miles either side of this prior to implementation

Increased noise impact early in the morning and late at night:

- Woken by the noise at 6am most mornings and sometimes 1am in the summer
- In the peak of summer there are 15 to 20 planes between 6am and 7am
- Excessive and unending noise levels from aircraft has resulted in disturbance to sleep both early morning and late at night
- Woken up most mornings early by aircraft noise
- The planes don't stop until 12 midnight and start again at 5am

Impact of increased noise on health and wellbeing and quality of life:

- Put house up for sale as so fed up with the noise
- Lack of sleep and constant noise has a detrimental effect on health and wellbeing
- Living with the noise is unbearable
- During the summer we have to stop talking to each other or shout at each other when indoors with doors and windows open
- Deafening levels of noise and constant stream of aircraft taking off one after another
- Not feeling safe and experiencing a major loss in quality of life
- Life has become intolerable due to the excessive and unending noise level from aircraft

Inadequate consultation and a lack of honesty on NIAL's part:

- The consultation was a failure due to lack of scope and reach and absence of key noise information
- The new flight path arrangement was imposed on the village of Haddon on the Wall without any consultation with residents
- NIAL did not inform residents of Haddon on the Wall of the obvious increase in noise pollution prior to the implementation of the new satnav route
- NIAL did not inform residents that noise would get worse for a lot of communities around NIAL.
- The airport was less than honest with us.
- All the local councils are shareholders of the airport, so we can't contact them with noise complaints

Airspace change documentation was deficient and the PIR documentation submitted by NIAL is similarly deficient

- The ACP documentation was deficient and was insufficiently challenged and not properly assessed by the CAA and should not have proceeded at the time
- NIAL's PIR submission is deficient missing key data with which the implementation of the ACP might be adequately assessed
- The CAA has said, in its own environmental assessment of the ACP, that the Airport had failed to take any account of the expected increase in frequency of noise events over residents under and close to the flight path centre lines. As it did not do this NIAL did/could not inform residents that noise would get worse for a lot of communities around NIAL. If told, it is likely there would have been opposition
- There were no valid environmental targets in the ACP and so it is not possible to say post implementation whether there have been any environmental gains or losses

The advantages to living in proximity to NIAL outweigh the disadvantages:

- Fully supportive of the airspace change
- The very small disruption is a trade-off for having such a useful amenity on our doorstep
- I hope others from the area have shown their support

11. Complaints data from non-aviation stakeholders

NIAL provided complaints data and a summary report which can be viewed on the CAA portal [NIAL stakeholder feedback summary report](#)

Number of complaints and complainants:

- January 2014 – December 2014 = 39 complaints from 39 complainants
- May 2016 – July 2016 = 49 complaints from 46 complainants
- May 2017 – Feb 2018 = 132 complaints from 59 complainants
- January 2020 – March 2020 = 67 complaints from 9 complainants

Consideration of the complaints data shows that there was one location from which there were 10 or more complainants and that was the village of Heddon-on-the-Wall:

- May 2017 – 12 complaints from 10 complainants
- June 2017 – 11 complaints from 10 complainants
- September 2017 – 23 complaints from 14 complainants

The areas from which the highest proportion of complaints were received related to the westerly departure routes. It is acknowledged that complaints were received from villages on the easterly departure route, for example, Annitsford, Cramlington and Wideopen.

Stakeholder feedback was received by email and very few respondents provided their postcodes. Those postcodes included are from addresses in Heddon-on-the-Wall which is reflected in the complaints data. The locations referred to in the stakeholder feedback, where postcodes were not provided, are the same as the locations from which complaints were received.