Communities Against Gatwick

Noise and Emissions

The umbrella aviation community and environment group for Sussex, Surrey and Kent

CAGNE response May 2023 - health before aviation profits.

Gatwick Airport already has a pollution zone and seeks to increase this with a 2nd runway.

CAA Consultation: Airspace change masterplan: scoping the environmental assessments - Closing date: 08/05/2023

https://consultations.caa.co.uk/policy-development/airspace-change-masterplan-scoping-the- environment/

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Introduction

This consultation must be welcomed by environmentalists, as much is made of the modernisation of airspace by ACOG and the government with this process (FASIS and FASIN). We view this as a step forward in recognising the impact aviation has on nature.

COVID presented a unique opportunity to see the full impact of aircraft flying over wildlife habitats, as there was a period when very few planes flew in and out of Gatwick Airport.

Evidence

Ashdown Forest is one of the most recognised areas within the impact of Gatwick Airport operations. It is already a recognised area of the European Site Conservation Objectives relating to Ashdown Forest SAC.

Ashdown Forest is an ancient area of tranquil open heathland occupying the highest sandy ridge-top of the High Weald Area of Outstanding Natural Beauty, within the High Weald National Character Area (NCA Profile 122). It is situated some 30 miles (48 km) south of London in the county of East Sussex, England. Rising to an elevation of 732 feet (223m) above sea level, its heights provide expansive vistas

across the heavily wooded hills of the Weald to the chalk escarpments of both the North and South Downs on the horizon.

There is further evidence that it is not just Ashdown Forest that is impacted, but nature in general, by the emissions of planes flying overhead and landing at Gatwick Airport.

Much of the land to the north of Gatwick Airport is a pollution zone, due to the westerly wind. Gatwick proposes to add more pollution to this area by rebuilding the emergency runway as a 2nd runway with new car parks, industrial facilities e.g. CARE (incinerator), hotels, and new road systems to provide greater capacity. Freight and drop-in SAF would all arrive to the north of the airport in the pollution zone.

Gatwick also proposes to place open water and green spaces in the pollution zone, which could be a receptor for pollutants.

We must consider nature in the path of aircraft flying to and from the airport, such as the large rewilding programme at Knepp, the rural expanses of fields and woodlands, and areas of outstanding natural beauty.

Air pollution decline due to aviation impacts nature as well as humans.

This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

Critical Loads and Levels are recognised thresholds below which such harmful effects on sensitive UK habitats will not occur to a significant level, according to current levels of scientific understanding. There are critical levels for ammonia (NH3), oxides of nitrogen (NOx) and sulphur dioxide (SO2), and critical loads for nutrient nitrogen deposition and acid deposition. There are currently no critical loads or levels for other pollutants such as Halogens, Heavy Metals, POPs, VOCs, or Dusts. These should be considered as appropriate on a case-by-case basis.

Ground level ozone is regionally important as a toxic air pollutant but flux-based critical levels for the protection of semi-rural areas.

This Supplementary Advice to the Conservation Objectives presents attributes which are ecological characteristics of the designated species and habitats within a site.

Tandridge Council Directive 92/43/EEC on the conservation of wild fauna and flora (known as the Habitats Directive) and Directive 2009/147/EC on the conservation of wild birds (known as the Birds Directive) have been transposed into UK legislation through the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended). These regulations provide, inter alia, a framework for the protection of European sites. Within this report the regulations are collectively referred to as the 'Habitats Regulations', given their approach to protecting European sites are very similar, having been derived from the same European Directives and case law.

1.23. The Habitats Regulations define the approach for the assessment of the implications for European sites of the implementation of plans and projects. This process is known as the Habitats Regulations Assessment in England and Wales and Habitats Regulation Appraisal in Scotland (together termed HRA in this report). There are a number of guidance documents/web-based information provided by Government agencies that describe the process. The most relevant are:

• _Habitats Regulations Assessment: protecting a European site (2021) - https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site

We state the above and the testament below to illustrate the impact that aviation has on biodiversity and the need for further research into the impacts of ultrafine particles on the ground to humans and nature, all of which are fundamental to our existence – health before aviation profits.

Ultra fine particles affect wildlife as well, says Clive Cobie.

Observations of caterpillars over a 22-year period.

"*It was in the year 2000 that I, Clive Cobie now aged 63, arrived in this beautiful 65-acre woodland, between Rudgwick and Five Oaks, West Sussex*."

Clive lives in and attends to these native woodlands of West Sussex. It is under the arrival route to the west of Gatwick Airport, as well as a departure route (7 & 8).

"*Every spring, there used to be a period that corresponded with the birds' eggs hatching when thousands and thousands of tiny caterpillars would hang on silken threads and swing gently in the breeze whilst making their way back up the thread with their little silk ball, from which they make their cocoon.*

"*They got less and less, as the base lines changed. It was about 2015 that they ceased. Then the small birds that relied on them for their chicks, we had to supplement with bird food, which used to be left to rot once the caterpillar feast was afoot.*

"*Sadly, supplementing the birds during breeding season has become the norm, and I'd forgotten about the caterpillar abundance for their chicks and put it to the back of my mind. Until COVID, when the following spring came a flush of caterpillars. During COVID, birds had two and three broods, this made me think that it must have something to do with pollution as the particles from airplanes are a lot smaller than particles from car and truck fuel.*

"*The following spring was similar; this abundance of caterpillars didn't come close to that in early 2003 but it was a vast improvement to when planes are flying.*

"*I am anticipating a decline this spring now, as we have a return of planes overhead every 30 seconds."*

Testimonial by Clive Cobie

The Shack

Nr Keepers Cottage

RH14 9BG

Caterpillars come in many shapes, sizes, colours, and types.

Caterpillars are larval creatures that turn into moths or butterflies after they metamorphose.

Caterpillars are high protein for wild birds. This is because they have lots of amino acids, which the all animals and birds need to build proteins and stay healthy. Caterpillars are also high in fat and energy density (calories per gram). These make them a good choice when other food sources are scarce or less nutritious.

www.cagne.org part of evidence of **What about our air quality? 2023** supplied to support this document.

No joined-up thinking

As government looks to the land to grow crops to produce SAF in vast quantities, we heard from the Royal Society that we would have to plant 68% of the total agricultural land in the UK to satisfy aviation's requirements.

The plan would seem flawed by this alone, so we must look to the current uses of farm land and the farming sector.

The Soil Association has criticised the government's net zero inaction, commenting on the revised plans to reach net zero drawn up after the High Court ruled that the government's existing plans were not sufficient to meet its climate targets. They said "*It's shocking that the government's so-called 'Green Day' brings zero in the way of new policies to transform 70% of the UK - its farmland*".

If the government intends to grow crops specifically to produce SAF, shouldn't there be joinedup thinking about how this will work in practice and in the long-term, by engaging farmers?

On one hand, we are seeing carbon soil projects to create new income streams for farming – improving soil to reduce carbon release so that carbon certificates can be awarded, with Defra recently agreeing to pay £40 per hectare under the Sustainable Farming Incentive (SFI). The improved soil should absorb carbon that would normally be released.

To receive SFI, farmers must have a feasible cycle of soil improvement through diversified crop rotations and livestock grazing. We must question whether the crops grown should be those that will feed a growing population or fuel a luxury industry such as aviation. The government is helping farmers to access this incentive by seeking £1bn a year through private financing to assist with SFI.

"*A key solution is to combine trees with crops and livestock in agroforestry. More trees on farms would capture carbon and provide a habitat for our depleted wildlife*" said the Committee on Climate Change. But if planes fly over this habitat, as detailed in the testament by Mr Cobie in **What about our air quality? 2023**, with the impact of ultrafine particles, we see that the habitat is not providing the biodiversity it requires to function naturally and sustainably.

We quote the Farming Minister Mark Spencer "*As well as producing food for our tables, farmers and land managers can play a key role in helping the UK achieve net zero*."

England is a small island facing greater and greater pressure to build, build, build on green land, especially in the southeast where we see growing commercial desires for airport expansion – land that would have been used to provide food for the table or SFI. Not only has it to improve soil content to reduce carbon and grow trees for habitats, but also to provide land for other sources – which simply does not add up for the land-mass available.

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