CAGNE
Communities Against Gatwick
Noise and Emissions
The umbrella aviation community and environment group for Sussex, Surrey and Kent

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CAGNE comment on the consultation and policy on CAA Modernisation of Airspace Consultation 2022

CAGNE do not agree with Vision CAP 2298a and find that the Objectives based around facilitating a commercial luxury polluter – Aviation – over UK residents' rights for wellbeing and protection of their homes.

Once again, the CAA have produced a vast complex document that ensures residents (both those already impacted and to be impacted) are actively prevented from participating.

As detailed by ACOG -

- **Transparent:** Stakeholders are presented with information to help them understand the impact of the system-wide changes on them. All information will be clear and accessible. Although the concepts included in the Masterplan may be complex the language used to communicate them during engagement will be clear.

The problem with government policy and statutory requirements are that they are out of date before they begin.

The philosophy behind the Modernisation of Airspace is that it has been based on Aviation's desires for growth, whilst ignoring the communities that will or could be impacted by airspace change, and whilst basing much of the policy on those currently overflown, not learning from the anger caused by current aircraft noise.

Although modernisation may have the potential to reduce noise for some, its aim is too focused on the desires of aviation and the flyer, rather than seeking to limit aviation's impact on humans and the planet.

The benefits are likely to be modest to those currently overflown, while much of the population to be newly-overflown will be enraged as they have looked to avoid living in areas already overflown and have not been consulted at any point by the CAA or government when developing policy.

All of the benefits to communities may also be substantially outweighed by the extra noise and emissions from additional flights, because of the significant increase in capacity that modernisation will enable.

CAGNE feels the process of the modernisation of airspace should be halted, due to the benefits felt by the population during the pandemic in much-improved air quality and substantial noise reduction.

The vision and objectives of the modernisation of airspace must be readdressed.

The whole scheme gives too much weight towards the desires of commercial aviation, with little value given to the human suffering, wellbeing, and the planet.

The Civil Aviation Authority's (CAA) airspace change process, through which modernisation will primarily be delivered, is currently likely to reinforce this pro-industry bias, because the law requires it to prioritise the efficient use of airspace over local environmental impacts and planetary impact whenever the two are in conflict.

The CAA CAP1616 consultation process is seen as an industry box-ticking exercise to facilitate aviation growth, as the CAA are acting as judge and jury undertaking the PIR of any airspace change. The new CAA body to replace ICCAN is not seen to be the 'community friend', but more-of-the-same from an industry body.

Section 2.79 - Many have been seeking to achieve a balanced approach but, sadly, not for those to be newly-overflown (2.35/page 23 of consultation). Much of the consultation and feeding into policy and the CAA consultations has been biased towards the current state-of-play and the desire by the aviation industry to grow at any price, with no regard to those on the ground or to the planet.

Therefore, there has been no balanced approach to airspace change; as such, the process, policy, and consultation, must be seen as flawed and be legally challenged.

We quote to the consultation to illustrate how the process is not working - *'Need for an effective mechanism to trade-off noise and carbon so Airspace Change Proposals (ACPs) can make it through the process and* ***improve collaboration with communities since trade-offs can then be demonstrated clearly****. A policy isn't enough, we need the means to do it, some guidance/methodology to help us deliver the noise and environmental obligations/desires.*

Most carbon saving routes can also be the noisiest – WEBtag is not helpful, and communities don't like it'

Section 2.83 – the cost of modernisation of airspace must fall to the industry and not the taxpayer, as is the current state of play post-COVID. Aviation seeks to benefit from this process and so the polluter and beneficiaries must pay.

Figure 2.2 illustrates how only those further out may benefit from CCO (does not start until 3,000ft) and CDO, not those closer to the airport. This ignored the Aviation Guidance on minimising noise for those below 4,000ft.

In Figure 2.1, the usage of PBN clearly illustrates how rural communities are to be targeted by this industry, whilst ignoring the fact that they have chosen to live in tranquil areas and so will be impacted to a far greater extent than those who live in urban or highly-populated areas.

Growth

The government's Decarbonising Transport Plan acknowledges this issue, stating: '*we need to move away from transport planning based on **predicting future demand to provide capacity ('predict and provide')** to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes*.'

When we act on these predictions, like spending huge amounts of money on large infrastructure projects, residents are left with these changes for dozens of years. To counter this, we must accept that officials and WEBTag are bad at predictions. We need to create airspace that can adapt to challenges and solutions that we haven't even thought of as yet, and that must include the priorities of reducing noise for <u>all</u> communities and not just those who shout the loudest.

When you look at modelling all types of transport, we must ask the question 'Are you modelling for industry, consumer, or communities?'. Modernisation of Airspace is all about the industry and the consumer and ignores the antagonism that new flight paths over new areas will cause.

Predicting the future based on previous experience will, by definition, lead to the same conclusions and, therefore, the same very expensive outcomes with the formation of more noise groups opposed to the aviation industry.

Humans have historically made predictions that were seen to be flawed, and as such we must question the demands that aviation say they need in our skies. **The CAGNE prediction is that residents will not be able to move away from aircraft noise, as all the sky will be full of PBN routes – residents caged in day and night by aircraft noise and movements.**

We must ask: what about the emissions, soot, vapours produced by aviation and the subsequent noise of flying over new communities to share the noise load, as noise groups desire? Moving noise from one area over another to facilitate the modernisation of airspace growth and efficiency just creates more anti-airport noise groups and feeling.

Many communities' noise groups further out from an airport use 'save CO2' to benefit them, to encourage flying over those closer to the runway at very low height, significantly increasing drag and noise on the ground and so not benefitting from any noise abatement procedures.

Vision and Validation

Aviation may have had an international 'vision' but what about the 'validation' – the accuracy used to predict unsustainable growth of aviation? How does the industry

validate this vision when little is factored into the anger felt by newly-impacted communities or the decline in aviation due to expensive green fuels, green taxes, frequently flyer tax, and removal of VAT subsidies?

Much of the modelling provided by the aviation industry should be treated as an opinion rather than fact. We know with all models and algorithms used to inform policy decisions (government housing targets of 2021/22), that the solution pumped out at the end is only as good as the information fed in at the beginning (in computer-speak: GIGO - “garbage-in, garbage-out”). And that information is vulnerable to mistakes and human biases as much as any other source, such as the aviation industry figures.

CAGNE are increasingly concerned about that untenable position, as the evidence on how increased prosperity of aviation, value and wellbeing metrics are influenced by place and urban design, whilst rural communities face the onslaught of aircraft noise, as in being targeted to appease others (section 2.79).

‘The government’s current policy statement, as set out in the ‘Aviation policy framework’, is: The Government’s overall policy on aviation noise is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise, as part of a policy of sharing benefits of noise reduction with industry.’

The staggering value that policy-makers have put on improving journey times – the efficiency of what is effectively a luxury industry – does not reflect the value placed on not being overflown, or loss of house-value, or the impact that aviation has on the health and wellbeing of residents.

Noise is still the number one consideration up to 4,000ft, not saving CO2, with the Air Navigation guidance stating 7,000ft as the threshold whereby noise comes before saving CO2.

Climate change is now generally understood by scientists to be a systemic global problem, in which individual decisions are too small, at any scale, to make enough impact.

The tinkering-around-the-edges of flight paths to reduce CO2 does not consider the increase in the number of flights desired by the industry, nor the consequence of this growth on communities.

All communities should have a fair input to influence design of airspace, which is not the case currently as, by design, only noise and environmental groups have fed into policy and consultations (ANEG).

Local authorities are dependent upon individual councillors who seek to influence aircraft noise away from their electorate, making other areas vulnerable to new noise as the trade-off. This can’t be seen as a democratic process, especially if the council seek to financially benefit from the airport (sponsor) - Section 38 of the CAA Act 1982 (noise action plans and 106 agreements).

'Concerns around prioritisation of larger hub airports over regional airports, and all airports should have fair input to influence airspace designs - also mention of Airport Operators Association (AOA) membership and balanced representation.

AMS should be linked up with local development plans – bigger role for local authorities required to make sure any planning exercise is coordinated, concern that changes for land planning are completely detached from airspace planning.'

Air Quality

What value equates to true air quality and greenhouse gases in WEBTag? New aircraft routing must be valued on the loss of house-value, the decline in wellbeing from being overflown, and the carbon values on the date of analysing. So often, data is out-of-date, and as such, WEBTag results must be questioned.

The Environment Act 2021 has air quality as one of its key objectives that **must be applied by law** in all policies of government.

Air quality decline due to ultra-fine particles in the air, which are far-reaching, has been ignored and continues to be so as the aviation industry seeks for government funding, whereas the correct approach should be the 'polluter pays', however far-reaching the particles may be found from the airport.

For example, at Gatwick Airport – 15% of emissions come from the road, whilst 30% come from aviation. It is predicted that by 2038, business-as-usual will see NOx increase higher than the 2018 figures. With two runways, this would increase by another 25-30%. Even ICAO recognise that there will be 2-3 times more NOx released between now and 2050.

With SAF, little is known of the emissions released as they are very much dependent upon the chemical formula of the SAF produced.

It is a well-known fact that soot and contrails can account for far more emissions and damage to the planet than carbon, and so we find the above unacceptable.

Hydrogen for fuelling aircraft, whether green or blue, raises serious questions about the water vapours released, so could be responsible for considerable increases in these emissions, according to scientists. [i]

Policy and process put in place must seek to balance the community impact vs. aviation's desire for unconditional growth. It must also seek to protect the planet by transport goals for the industry being contained within the net-zero ambitions of 2030, 2040 and 2050.

Government currently only seeks to use the old WHO guidance, whilst lacking evidence as to how they are to meet the new WHO guidance. They only seek to solve issues by yet another action plan – Air Quality Action Plan, the same as the Noise Action Plans. This is simply not good enough to tackle the dire consequences of poor air quality, especially when created by a commercial industry. [ii]

(51) 'There is uncertainty over the exact climate impact of contrails. We will keep under review the evidence of their impact and potential means of mitigation.'

PBN and Noise

There is a lack of ambition to reduce noise, whereas most ambition is about airspace efficiency and the benefits for the industry and consumer – *'Airspace management is costing time and fuel'* – so what, when human life is being impacted so much by a luxury industry?

To suggest that new communities will welcome the introduction of more PBN routes to allow for respite over others that have been historically-overflown, is simply unacceptable and laughable.

'We need clarity on the PBN implementation status and the strategic requirement and whether it's going to be a regulatory requirement.

Concentration most effective for operations and best from a safety perspective, but dispersal options haven't been explained properly. Question whether other compensation options should be considered to benefit all and get people to accept concentration.'

Performance Based Navigation was one of the worst elements of airspace change that the government signed up to, and can only be surmised to be agreed upon without trials. The immediate reaction of communities has been one of great anger, to be targeted in this way whilst ignoring the Noise Preferential Routes that have spread the load of noise since the 1960's.

This was and is a major flaw in the process of the Modernisation of Airspace. In fact, we predict more and more communities becoming anti-aviation due to the Modernisation of Airspace plans. (Evidence ADNID trial at Gatwick in 2014 and PBN introduced on all departures routes)

Improved climb and descent profiles may benefit some, but not all, and this needs to be accepted as CCO does not come into play until 3,000ft and CDO only helps those further from the runway and the ILS (section 3.26).

'New technology will solve CO2 and noise and air quality issues'

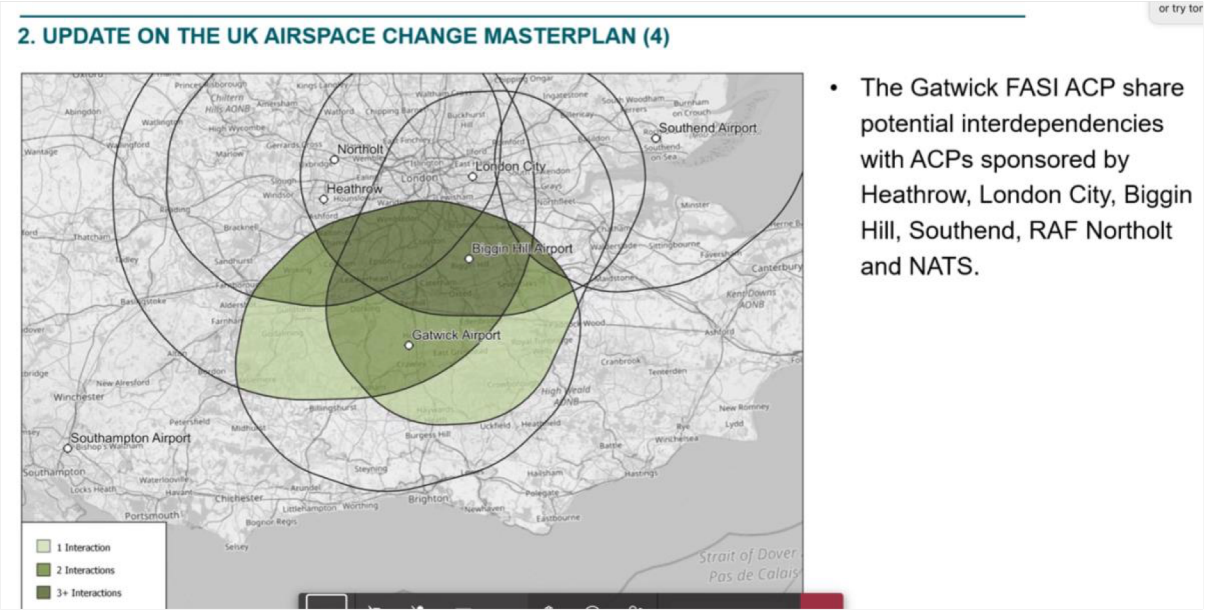
We see no evidence of this statement being a reality.

Airspace of the future

Drones and helicopters are the next noise issue, little is detailed on this. Air mobility taxis needs to be included in airspace.

Noise envelopes overlap at Gatwick Airport and, as it proceeds with FASIS, we see no evidence of a fair or balanced geographical input into what are noise envelopes

and how they are to be used. We see numerous new routes being planned without any consideration to those to be newly-overflown, those to be overflown at very low heights or any mention of considering noise envelopes which seek to share the noise load as they seek respite, and to move noise over new communities whilst not engaging with them.



[i] https://youtu.be/f-4if26F_RA

[ii] https://www.createstreets.com/wp-content/uploads/2022/02/Computer-says-road-1.pdf

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