

To: airspace.policy@caa.co.uk / airspace.modernisation@caa.co.uk

From: PHASE / [REDACTED]

Date: 2.4.22 / 4.4.22

Plane Hell Action SE (PHASE)

<https://planehellaction.org.uk/>

responds to

CAA's draft https://consultations.caa.co.uk/policy-development/draft-airspace-modernisation-strategy-2022-2040/consult_view/ of its refreshed Airspace Modernisation Strategy 2022–2040

Plane Hell Action SE (PHASE), represents those under Heathrow (and London City) Airport **arrivals** paths in S and SE London, as well as supporting a strategy for arrivals and departures operations that fairly considers those under flight paths.

As noted in our response of 29.11.21 to CAA's on-going review of CAP1616 (<https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=8127>) we are concerned that Airspace Modernisation, also known as PBN and describing the concentration of flight paths, will create communities of winners and losers, with policy decisions made on flawed evidence.

We are concerned that

- not enough research has been done to show the impact on individuals of noise and fuel emissions of those proposed concentrated flight paths;
- CAA is proposing to use flawed documentation to guide its decision making of CAA's recent CAP documents 2161 and 1506 where the serious flaws, omissions and deficiencies led its peer reviewers (of SoNA 14 Nights) to say they should not be used for the purposes of policy making.
- moreover, CAA has confused its measurements of 1000 metres with 1000 feet which is a serious mistake where air quality is concerned of The CAA consultation document part 1 says at para 2.56: *Due to the effects of atmospheric mixing and dispersion, emissions from aircraft above 1,000 feet are unlikely to have a significant impact on local air quality* referring to the ICAO Document 9889. This is not correct. The ICAO doc 9889 referred to provides that the mixing layer is at 1,000 metres (not feet). Para 2.3 Appendix 1 to Chapter 3 of ICAO doc 9889

Neither the CAA nor the DfT are in a position to make balanced decisions on Airspace Modernisation and related PBN given the absence of credible evidence where aviation noise generally or that which refers to night flights, or the impact of concentrating that noise, and fuel emissions are concerned.

Until and unless the impacts of flight path concentration have been fully researched airspace modernisation and the implementation of PBN should not be taken forward.

You have been warned by the outcry in USA where PBN has been implemented: if this is the model CAA is proposing it must not be implemented in the UK.

We fully support the responses made by Teddington Action Group:
<http://www.teddingtonactiongroup.com/2022/02/20/tag-responds-to-the-cao-consultation-on-draft-airspace-modernisation-strategy-2022-2040/>

& the Aviation Environment Federation, letter of 31.3.22 to Robert Courts MP and Richard Moriarty CEO CAA attached.

Bridget Bell, Dan Scorer

Plane Hell Action SE / PHASE

2 April 2022