



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

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Airspace.modernisation@caa.co.uk

CAGNE response to the CAA and DfT consultation CAP3029 Modernisation of Airspace; Establishing UK Airspace Design Service (UKADS)

Summary - What 'size of the prize' is being offered to communities and the planet?

What is the community involvement?

Why are cost cutting measures being proposed at the outset?

CAGNE finds no 'size of the prize' offered (as detailed in CAA paper point 97), only negatives from the modernisation of airspace. This proposed new body UKADS (by the CAA and DfT) will be purely industry led, the same as the current ACOG body, headed up by the ex-CAA employee who introduced and reviewed PBN (Performance Based Navigation) at Gatwick Airport in 2014.

If communities are to accept that airspace needs modernisation (to be in line with new technology of planes and air traffic control), they must at the same time ask why the process and benefits are purely focused on growth, with few benefits (if any) for residents on the ground or for the planet.

'The primary indicative monetised benefits are fuel savings to airlines operating at airports who are able to modernise their airspace earlier – this amounts to a PV of £43.5m.'

The process to date has been dominated by aviation seeking to save time and fuel, but at what cost to those on the ground?

'To deliver quicker, quieter and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace, as well as the wider strategic objectives of airspace modernisation – enhancing aviation safety, enabling the integration of diverse users of airspace, simplifying airspace designs and improving efficiency, and applying environmental sustainability as an overarching principle through all airspace modernisation activities.'

Much has been undertaken and decided via interested parties, whether that be airlines, airports, manufacturers, or government. The process has had very little engagement with those on the ground impacted by the operations of aviation.

Communities have increasingly been removed from the process, as appointed bodies (such as ACOG and NATS) have a purely aviation-focussed interest in achieving what is best for aviation and not necessarily considering communities. The CAA continues to play judge and jury over CAP1616.

'This is largely a transfer from airspace change sponsors (predominantly airports and Air Navigation Service Providers (ANSPs)), who would experience corresponding savings of £32.9m. Airspace change sponsors will face familiarisation costs of c. £85,600.'

We must ask: where is the 'balanced approach' as required by policy and indicated by ICAO?

'The primary indicative monetised benefits are fuel savings to airlines operating at the London airports that are able to modernise their airspace earlier – this amounts to a PV of £40.0m. There are further substantial social benefits delivered through the associated reduction in carbon emissions, valued at £45.1m. Scored as 85.2% benefit to aviation.'

Where are the benefits to those on the ground, if reduction in noise is to be scored only at 3.5%? It is also stated that there will be 'trade-offs', which suggests that there will be winners and losers amongst communities (while presumably only winners for aviation) – so where is the balanced approach and where are the shared benefits?

It is suggested that the cost of the new body would fall to aviation. This body will therefore be seen as having a vested interest in progressing what is desired by aviation, thus being neither trustworthy nor independent, so not acceptable to communities. The process will be even more biased than it is currently.

It is clear that the sponsors' initial costs will be outweighed by the profits gained from the changes to airspace. This leads to no incentive for the sponsors, or the new body, to be compassionate towards the impacts that airspace change will have on the ground.

'Costs predominantly fall upon those organisations that will be captured by the funding mechanism for the UKADS – expected to largely be commercial airlines. Across the ACPs assumed in this case, this results in a PV cost of £46.6m. This is largely a transfer from airspace change sponsors, who would experience corresponding savings of £45.7m. Airspace change sponsors will face familiarisation costs of c. £104,000. Scored 9.2% benefit to aviation.'

The following statement must be seriously questioned as with more planes and growth come more emissions of CO₂ and greenhouse gases – vapours.

'There are further substantial social benefits delivered through the associated reduction in carbon emissions, valued at £48.9m.'

Any emissions savings from reducing fuel burn will be negated with more planes, enabled by the extra capacity.

- ◇ SAF is known to produce the same pollutants as fossil fuel when burned. SAF capacity is insufficient – should we use that capacity for heating homes or for luxury flying?
- ◇ Hydrogen is years away, if it is even feasible. Some scientists believe it is not suitable for the commercial aviation sector.
- ◇ Carbon capture may be good news generally, but (when available at scale) it will first be required to remove the 'everyday life carbon' from the atmosphere and not the colossal production of emissions from aviation.
- ◇ Reduction in delays for passengers. Passengers should pay to pollute by flying and the benefits of their flying must outweigh the pollution created.
- ◇ Offsetting is greenwashing, as it mostly consists of voluntary donations to questionable environmental projects.

Gateways – It is the opinion of many communities that Gatwick Airport should not have been permitted to pass into Stage 3 of CAP1616. This is due to lack of transparency through the initial stages, with poor mapping and detail that actively prevented stakeholders from engaging in an informed manner. This has been raised with the CEO of the CAA many times, as with the sponsor. All objections have been ignored by the CAA. We now see Gatwick has manipulated the data to achieve the desired new departure route over new communities (as trialled in 2014), significantly increasing the noise, increasing the number impacted by aircraft noise, and not allowing for the established routes to be included (unlike with arrivals that remain within the heat mapping).

We have also seen CAP1616 weakened to facilitate and benefit aviation, with a reduction in cost and documentation. Communities have not been considered, apart from the sectioning of the large complex documentation.

Point 25 states *'However, to do so requires a high degree of co-ordination between all change sponsors – designs must take into consideration those of other change sponsors in order to ensure they are non-conflicting.'*

And point 26 *'The CAP 1616 process is designed to mitigate this – requiring the calculation of negative externalities such as noise impacts to ensure that designs are robust, but there remains an incentive to prioritise benefits to the airport sponsor rather than the overall network.'*

We would suggest that, once again, no balanced approach has been taken in these two statements above, only seeking to mitigate conflicting interests of sponsors' gains. Again, aviation displays arrogance in missing the key factor that, without the cooperation of communities, this process will be flawed, as communities will not agree to changes and will fight in the courts to prevent them.

Point 31 *'The proposal will help achieve the vision of airspace modernisation: To deliver quicker, quieter and cleaner journeys and **more capacity for the benefit of those who use and are affected by UK airspace**, as well as the wider strategic objectives of airspace modernisation – enhancing aviation safety, enabling the*

integration of diverse users of airspace, simplifying airspace designs and improving efficiency, and applying environmental sustainability as an overarching principle through all airspace modernisation activities.'

In the above statement, 'more capacity' implies more air traffic, which will almost certainly negate or outweigh any reductions in CO2, pollution, and noise. We see no way in which this would 'benefit' residents on the ground 'who... are affected by UK airspace'.

The statement does not even mention communities, which must be questioned when much of what is being proposed will impact those on the ground.

Point 43 *'This option is discounted as it is thought unlikely the CAA would be able to attract and retain appropriately skilled airspace designers to deliver the required UKADS function and in the required timeframe. In addition, earlier stakeholder engagement has identified a lack of support from both industry and community groups for this option. **The principal concern was that this would place the CAA in the position of both designing airspace (as the UKADS) and then approving that design as regulator, thereby creating a perceived conflict of interest'**.*

The CAA continues to play judge and jury with CAP1616, so cannot be trusted to be independent. The CAA emphasis is on benefitting aviation over communities, so any process operated by the CAA or the DfT is construed as being biased.

We see no difference with this new proposal, especially having read the consultation documents, which are again focused on the benefits for aviation – point 44.

5.2.3 Funding – CAGNE agree that the aviation sector should pay for this new body (if formed). It is clear it will serve the interests of aviation over the interests of communities, so taxpayers' money should not be used.

One new take-off/landing slot is valued at about £3m. Does the CAA realise there is a huge commercial incentive to extract maximum profit from each one (approx. £7bn over 10 years)?

EasyJet reported on Nov. 8 the acquisition of Thomas Cook slots at capacity-constrained London Gatwick Airport and Bristol Airport for an aggregate £36 million (\$46 million). The slots include 12 summer slot pairs and eight winter slot pairs at Gatwick, as well as six summer slot pairs and one winter slot pair at Bristol. EasyJet plans to provide specifics on use of the newly acquired slots when reporting full-year results on Nov. 19.

5.2.4 – CAGNE does not believe that either option (1 or 2) is viable, due to the emphasis on those with vested interests in airspace design profitability and growth, such as the sponsors, government, CAA, NATS, etc.

UKADS must therefore be seen as an extension of (if not worse than) ACOG, another tier of bureaucracy to actively weaken the voice of communities who are impacted by changes – purely to accommodate growth in aviation at any price to human suffering or the planet's demise.

- ◇ Communities being offered platitudes rather than cost benefits.

Points 63 & 64 – Do nothing

CAGNE recognises that there are some in-flight profiles that could be improved to save CO2 but, with the predicted increase in aircraft movements, we see no overall saving of CO2 as aviation continues to struggle to decarbonise.

- ◇ The planet is again being threatened due to more planes, which equates to more pollution as SAF produces the same as fossil fuel when burned.
- ◇ Jet Zero is not policy but a strategy that is failing to consider greenhouse gases produced by flying, which could be more damaging than just CO2.
- ◇ Passenger growth is fundamentally fed by the unrealistic pricing of flights, as no VAT or duty is charged and the cost does not reflect the pollution caused.

Point 66 – Airspace is only becoming increasingly crowded due to more planes. If the pricing reflected the true cost (to the planet) of flying, the number of planes would inevitably decline, so reducing emissions, noise and congested airspace. This should be the incentive for aviation to invest in decarbonising, rather than expansion.

Point 71 – The simple fact is that there are no monetary benefits from this process for those on the ground or the planet – no balanced approach is offered by this consultation or proposal.

Point 72 – Trading schemes, offsetting, etc. are well-known as ‘greenwashing’ in the true realisation that emissions are not removed from the air and trading emissions is becoming big business to allow growth. If the carbon costs were passed on to the consumer in airline tickets, this again would reduce the number seeking to fly.

Point 73 – Again, CAGNE reiterates that the saving of fuel costs does not benefit the planet or those on the ground, only the airlines. If VAT and duty was charged on fuel, this would benefit the UK treasury whilst also reducing the number of flights.

Point 75 – Again, this is about benefits to aviation and those who choose to fly, but not those on the ground.

Point 76 - Options explained below – whilst growth is desired, noise can only increase. Aviation offers ‘smoke and mirrors’ to hide the truth of growth with no benefits for communities.

- **Traffic Dispersion** – this is how planes used to be flown prior to 2014 when PBN routes were introduced at Gatwick Airport on all departure routes. Residents were unaware of any consultation (CAP725) for the PBN trial operated by Gatwick and they now seek to fly over new communities purely to benefit Gatwick Airport (approx. £7bn over 10 years) whilst offering no compensation for loss of wellbeing or house value. It has been seen at Gatwick via the NMB that dispersion with PBN is not feasible unless you fly over new areas.

- **Traffic Concentration** – This is about growth for aviation, offering no benefit for those on the ground
- **Noise Respite** – This is flying over new communities (whilst offering them no compensation for loss of wellbeing or house value), to give those who are currently overflown time without noise. This impacts new communities for the sake of growth, again to benefit aviation and not those on the ground.
- **Noise Redistribution** – Not acceptable, as it is flying over new communities whilst not offering them compensation for devaluation of house price and loss of wellbeing. Again, this is to benefit aviation, not those on the ground.

If a two-phase process is planned, it should not lead to an overload of consultations, mixed messaging, or split consultation to pitch communities against each other. It should not have a negative impact on communities simply because the airport's desires have been put first, leading to planet-damaging growth.

9.2 Equalities – Dictionary definition is 'the state of being equal, especially in status'. We see no sign that equal consideration has been given to communities in this process or in the plan for a new body for the modernisation of airspace.

Monetary and Risks – This section only mentions the costs rationale for aviation – there is no mention of the risk to communities' homes or wellbeing, or any consideration given to the devaluation of homes.

10 Monitoring and Evaluation - We see no mention of community involvement, or any process of community engagement.

Point 91 – *'As the precise goals for each ACP are unique, it is impossible to estimate what kind of impact the UKADS may have – but it is plausible that it would be able to achieve cost savings.'*

It should be a concern to all that, from the outset, UKAD is being seen as a potential route to aviation's cost-saving. We question whether this new body will have an adequate budget to engage fully with communities over impact, or with NGOs concerning the emissions produced by growth.

Point 92 – Mention of familiarisation – CAGNE must question whether this is going to be a purely aviation industry-led body without community representatives, similar to ACOG – which has engaged purely with industry and business leaders, not communities nor NGOs.

8.2 point 101 – *'Secondly, the Secretary of State has powers under the Air Traffic Management and Unmanned Aircraft Act 202134 that allow for the direction of airports to progress their airspace changes to reasonable timescales, with financial penalties for noncompliance.'*

The above statement is highlighted in our response, due to concerns over 'financial penalties', as any cost implications will ensure that communities are not fully engaged in the process. As recognised under the risk section, we see aviation would cut costs to achieve their aims, as we are already witnessing with the Gatwick

Airport CAP1616 process – manipulating the data to achieve their original aim of greater profits, to the detriment of those on the ground.

Point 103 – *‘It is possible that frictions may arise between the UKADS and the former change sponsor. As each creates outputs that the other will require as inputs, relationships between the UKADS and former change sponsors will need to be closely managed, with governance processes ensuring accountability for delivery.’*

There is no mention of risk to communities and legal challenges to stop airspace change. These are almost certain to take place, as proposals threaten wellbeing and house values.

9.1 point 106-112 – There is no mention of the wider impacts on communities from the new body and the airspace change process.

10 points 118-123 – Why is there no mention of monitoring or evaluation of how this body is engaging in its role with the communities or NGOs?

www.cagne.org

cagnetatwick@gmail.com

@pledgetoflyless

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