

CAGNE

Communities Against Gatwick

Noise and Emissions

umbrella community group for Sussex and Surrey

11rd June 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769695/aviation-2050-web.pdf

The CAGNE response to the Government Aviation Green Paper

The Future of UK Aviation – Growth of aviation and its environmental impact

Introduction

CAGNE was formed on the 17th February 2014 due to the ADNID trial departure route being instigated by Gatwick Airport for a PRNAV route (concentrated flight path) over rural areas not previously flown over.

Since then CAGNE has grown and diversified as a major umbrella community group to embrace the many issues that Gatwick presents through their desire for growth including new flight paths, changes to flight paths, increases in noise, surface access, and is now a major campaigning/lobbying force opposing the second and third runway for environmental reasons.

CAGNE has an extensive network of members covering areas to the east, west, north and south of the airport, in rural and urban areas, of the airport concerned with the totality of aircraft noise produced by arrivals and departures, environmental issues, airspace and surface access for Sussex and Surrey and beyond.

The CAGNE committee consists of volunteers/residents to the east and west of the airport coming from many professional backgrounds including aviation.

An Annual General Meeting open to the public takes place each year in February where the chair and committee are elected.

CAGNE sends out informative newsletters to members, consult its members to formalise responses, and is active on social media – Facebook, twitter and instagram.

CAGNE also operates an independent forum (www.cagnepcforum.org.uk) to engage and consult with town and parish councils called the CAGNE Town and Parish Council Aviation Forum, which has currently 27 members. This is for councils and is run by councillors and operated under the councils code of conduct.

CAGNE is not just concerned with Gatwick Airport, but all airspace and gets involved in other airports in the UK and overseas; the environmental damage aviation has on climate change and air quality worldwide.

We work closely with CPRE Sussex and Surrey and other CPRE offices as well as other bodies such as SE Climate Alliance, Aviation Environment Federation, Members of Parliament, local authorities and other aviation community groups in the UK and overseas. CAGNE has a seat on Gatwick groups – Noise Management Board and attends GATCOM.

The CAGNE General Overview

- Aircraft noise and the environmental impacts of aviation growth cannot be mitigated or managed as suggested in the consultation. A *'sustainable' and 'balance'* can only be obtained if aviation growth is controlled and limited.
- It is deeply disappointing and worrying that the Government still puts growth of aviation and the enjoyment of the consumer before the serious environmental damage from aviation on communities and the planet.
- The government appears to wish to distance itself from any regulatory role in the aviation industry, preferring to allow the industry carte blanche, with damaging endless unsustainable growth.
- The government now plans to impact millions of new communities with aircraft noise through the removal of NPRs. This is fundamentally wrong and is undertaken with no true compensation or consultation of those to be impacted.
- Policy proposals would appear to suggest that everything and anything in relation to the continued growth of aviation could be managed and mitigated. This is unrealistic. Only 15% of UK population take 70% of flights** and 7 out of 10 travel for leisure and $\frac{3}{4}$ of travellers are ABC1 social class**. The profitability of aviation ownership seems predominantly out of the UK.
- The governments suggested a clearer framework to allow for further regional expansion in addition to the third runways at Heathrow; Gatwick and Bristol airports are a prime example of this through their proposed Master Plans 'making best use of current facilities' (Beyond the Horizon April 2018). This is allowing for expansion through the backdoor without public or parliamentary scrutiny.
- Airlines detail that there is already unwarranted passenger capacity and thus airlines are failing, this specifically goes against the government's predictions in the green paper for leisure growth.
- The promise of larger planes being flown to reduce CO2 and the number of movements by smaller planes is not occurring; the CO2 potentially saved will be dissolved due to increases in aircraft movements and carbon trading, which, in reality, does not work.

The CAGNE Summary of the Government's Aviation Green Paper

We find the government's green paper unsatisfactory in that it continues to ignore the impact aviation has on those on the ground in favour of leisure air travel and the profits of an environmentally damaging unsustainable industry.

Impacting millions of new residents –

- Noise Preferential Routes have been in place for over 60 years. To remove these is fundamentally wrong, as it will impact millions of new people at very low heights with no true, full compensation of house value and decline in quality of life. These communities have not been consulted by government.
- Policy to allow 'best use of current facilities' is allowing for large-scale expansion without the full parliamentary scrutiny, in Gatwick's case expansion via the back door.
- ICCAN is not the body for the government to use as an excuse for growth as the impact of aircraft noise on communities cannot be mitigated or managed by airport charitable donations or loft insulation; this is an insult to UK citizens to suggest such mitigation would authorise uncontrolled aviation growth

Environmental Impact Grows –

- The aviation industry's growth needs to be capped/ limited to meet climate change targets and a substantial reduction in aircraft noise. The UK should not breach climate change targets to accommodate unsustainable leisure travel and reforestation does not work.
- Aviation and frequent flyers must be made to pay a realistic price appropriate to the luxury industry and carbon damage caused.

Aviation should pay duty and VAT on fuel and the government should make the polluter pay; less than half of the UK population actually fly; The fact that aviation is, in fact, the fact that this a heavily subsidised industry is not general understood unlike other industries that compete on a level playing field with other industries whilst meeting costs of green technology, taxes and duty in full.

- Government policy needs to be stringent in fixing caps on the number of aircraft impacting communities. Policy must also reflect a balance between over flight of rural vs urban so that the 'number game' is removed from policy, which currently target rural communities as the losers.
- DEFRA needs powers to ensure NAP are adhered to and met; what is the long-term noise reduction plans and do they achieve them?
- Ban night flights at all airport for 7 hours due to the health impacts of night flights – WHO October 2018
- Accept impact of aircraft noise outside of LOAEL, especially in rural areas and the totality of aircraft noise inside SOAEL and LOAEL as some communities suffer unfairly when considering airspace changes and lack of respite in isolation.

No True compensation –

- Government policy needs to bring to account aviation and the ramification of its growth in a realistic manner so that it finances the ramifications of growth with true compensation, soft and hard infrastructure costs met in full if growth is to be allowed.

Full compensation for those impacted by new flight paths/ changes to flight paths up to 7,000ft, insulation is not acceptable especially in rural locations

False Economic Predictions –

- As the aviation industry witnesses a drop in aircraft orders and an impending price war with airlines already going out of business leaving passengers stranded overseas; is this the right time to be supporting this industry?

For example – Monach Airlines; Norwegian Airlines have financial problems; Thomas Cook are seeking to sell their airline; and Ryan Air and EasyJet have witnessed a drop in profits.

Business travel is on the decline due to technology making the need to fly less. At a time when the consumer is championing environmental awareness, should the government be seeking to encourage more leisure travel when this industry is unsustainable?

It costs more to travel by train from Gatwick Airport to London than to fly to Alicante leaving our coastal regions in desperate need of funding.

- The green paper displays false economics of growth and employment by including airspace and exaggerated and unsubstantiated increases in travel and aircraft movement.

Not greener –

- Ramifications on the surrounding areas of airport growth need to be addressed to safeguard green land/ countryside from urbanisation and decline in air quality.
- To safeguard land on the never, never, potential of airport growth is unacceptable and blights communities further and traps residents unable to sell homes. This is strongly opposed unless the airport buys the land and houses concerned, as well as pay full house value compensation for those blighted by such long term plans.

The CAGNE response in full:

Chapter 2 Build a Global and Connected Britain

- **False economics** - Overseas visitors to the UK accounted for just one sixth of UK tourism expenditure in 2016. Domestic tourism (i.e. UK residents) accounted for five sixths⁶. UK residents took 56m overseas leisure trips by air in 2017 compared to 24m trips to the UK by foreign tourists. Business travel accounted for another 6m overseas trips by UK residents and also 6m trips to the UK by overseas residents.⁷ The UK had a tourism trade deficit (air) of £20.6bn in 2017.⁸ Overseas tourism by UK residents outnumbered inward tourism by 2 to 1.¹²

UK residents took fewer business flights in 2017 than 20 years previously¹⁶

Business travel is now just 9% of UK residents' flights versus 18% in 1997¹⁷

The Air Transport White Paper was predicated on a DfT forecast of 500mppa by 2030. DfT does not now expect 500mppa until 2050 and in fact 2018 saw 285mppa.

Gatwick flew 9 million people to/from Spain last year compared to just 160,000 to/from all four BRIC countries combined – Brazil Russia, India and mainland China.²⁰

Passenger figures for London Airports; there are increases or decreases in 2018 compared to 2017:

Heathrow +2.7%
London City +6.4%

Gatwick +1.1

Domestic short haul fell by 8.7% and charter fell by 5.7%

Luton +5%
Stansted +8%

Source Airliner Journal

- The paper does not address the dis-benefits of aviation growth or the money spent outside of the UK overseas, it purely focuses on money generated without direct comparisons to costs caused by airports on surface access, NHS, rural impact of aircraft noise, green land disappearing to build mass housing and industrial parks, climate change, decline in air quality, money out of UK purpose by the increase in leisure travel.
- **Local Issues Dealt with Locally** - Chapter 2 of the paper suggests controlling noise locally. As stated previously local authorities often

have a financial vested interest in the airport and so this is unacceptable as they cannot be seen to be impartial in any decisions made.

Decisions made locally are often based on 'who shouts the loudest' and as such this would be from urban areas leaving rural areas vulnerable.

It is also the fact that concentrated flight paths are to be mandatory and no local airport is going to seek to go against government policy or new technology to maximize growth or face legal challenges for doing so. This leaves some communities very vulnerable to aviation greed to accommodate greater number of aircraft movements, meeting the efficiency and saving of CO2 as desired by the government whilst ignoring the impact such concentration has on health and wellbeing.

We raise major concerns that new technology will seek to remove noise preferential routes; these have been in place at designated airports to safeguard communities, to predict flight paths, if these are removed they will be subjecting a vast area of communities to first time noise. Other procedures that are declared as reducing noise, in fact, do not and so we question them being used by the government and industry to seek growth through failed noise abatement procedures such as CDO, CCO, NADP1 and 2, etc.

And suggested noise reducing aviation initiatives, Continuous Climb Operations seem to burn more fuel than what it saves so increasing NOX.

Chapter 3 Ensure Aviation Can Grow Sustainably

There is no such thing as 'sustainable growth' in relation to aviation due to the ramifications aviation has on local communities, local authorities, noise, air quality, green land, wellbeing of communities and wildlife habitat and climate change, all of which can not be managed or mitigated.

- Aviation growth is not sustainable in its present form due to unrealistic ticket pricing and lack of resilience which will inevitably lead to more airlines in financial difficulty, eg Monach, FlyBMI, WOW, Thomas Cook are trying to sell their airline, Germania airline filed for bankruptcy, Ryanair posts first loss since 2014 and now Norwegian Airlines have significant financial issues;
 - a. *UK airlines seem to go be going into administration on a regular basis;*
 - b. *it seems advance bookings cannot be honoured and so customers are told to contact their credit card companies for a refund or in Monach's case the taxpayer picks up the bill for those stranded overseas.*
- There is a serious lack of joined up thinking in the green paper, a lack of considerations on the effect of airport growth on other department's briefs eg DEFRA, NHS, rail, road, etc.

- The industry projects false economics as previously stated under Chapter 2 in this response.
- “Partnership for sustainable growth” diagram at figure 8 in the Green Paper. Local authorities have a vested interest in airport growth, as such are biased in their approach to the ramifications of noise on rural and urban areas. As government funding declines, local authorities look to airports for sponsorship and 106 agreements as such they are not impartial.

Modernisation of Airspace for the future

- The removal of Noise Preferential Routes would condemn millions of new communities to aircraft noise. These communities will not be consulted by government or local airports as they only consult those already impacted by noise, for example Gatwick Airport FASIS stage 1 and 2 and CAP 1616 Route 4.
- This is being implemented without any research into the ramifications of concentrated flight paths on those on the ground. We note that the noise ramification of PBN are recognised but the health impacts are not.
- Any CO2 saving from this process is to be eliminated due to the increase in the number of aircraft flying.
- The industry is endeavouring to put forward mitigating processes that ‘reduce noise’ but the reality is that noise is not significantly reduced.
- Concentrated flight paths are already impacting new people and no compensation is forthcoming from airports or via policy to counter devaluation of homes and residents wellbeing.
- Multiple routings impact newly affected areas and rural communities are being targeted by policy in the ‘numbers game’ of winners and losers whilst ignoring the tranquility that people have paid a premium to enjoy an outdoor lifestyle.
- The government is seeking to ‘play god’ with people lives to benefit aviation acknowledging that there will be winner and losers but making no suggestion or offering of full comprehensive compensation for their loss.
- ICCAN is an unknown quantity and we do not know if it will have statutory powers or if it will be permitted to operate as an ombudsman. It must not be used by government to allow growth and flying over new areas.
- ANEG has been formed with little consultation and the community representation on it is unknown.
- Defra does not hold airports to account or set targets to be met in noise reduction

Safeguarding of Land for Growth

We strongly oppose this suggestion as it blights communities for years. It devalues homes and places residents and local authorities in limbo to future strategies.

Community Engagement and Sharing Benefits from Growth

- Airports create 'tick box' forums to engage with communities enabling them to fulfill CAP1616 criteria. The reality at Gatwick is little is done to reduce noise in a meaningful way. For example the Gatwick Noise Management Board have not met their Terms of Reference 25 for the past 3 years in allowing the community engagement to be dominated by one set of airspace concerns. The Arrival Review did not look at full airspace change only arrivals as such the recommendations submitted benefitted a select section of communities whilst not engaging with all now impacted.
- GATCOM, NATMAG, are forums that are biased towards Gatwick Airport and growth. Community groups only have one voice amongst a sea of airport supporters and government officials.

This is why communities do not trust these forums operated at and by Gatwick Airport.

Elected local authority members have a heavy workload and aviation produces sustainable paperwork as well as being complex, as such the government cannot expect these bodies to take on and represent communities at such consultative committees. This has to be the role of umbrella community elected representatives that specialise in aviation/ local airport issues.

Until noise reduction is put as a priority above the flyer and industry, communities will continue to be ignored and unfairly impacted by aviation growth, which this Green Paper sadly endorses.

- Sharing the benefits of community funds that an airport donates to local causes such as charities, schools, local authorities and sports clubs is unsatisfactory. These bodies have, in part, an interest in airport expansion as this may result in a continued source of income needed due to the reduction of government funding for local authorities and hospice. As such local authorities that sit on statutory bodies, eg GATCOM, supposedly resenting their electorate should be classed as having a 'vest interest'. This makes them unable to be impartial and unable to fairly represent the objections from 'affected communities to be supported'.

It is also true of Gatwick Airport, that the criteria set for charitable donations are not met by many that apply and that they tend to donate to areas not affected by aircraft noise.

Noise and CAA CAP 1731

- The removal of Noise Preferential Routes would condemn millions of new communities to aircraft noise. These communities not consulted by government or local airports as they only consult those already impacted by noise, for example Gatwick Airport FASIS stage 1 and 2 and CAP 1616 Route 4.
- We welcome the fact that the green paper recognises that tolerance to aviation noise is less than any other form of transport and this intolerance is increasing (from 57 to 54 decibels). Gatwick is a good example of this. It also recognises that there is a health cost to aircraft noise.
- We feel the noise base line from which the government is initiating its findings and proposals is already too high.
- We continue to be very disappointed in the fact that the government does not recognise the difference between urban and rural impact of aircraft noise. A set of noise metrics that recognise true tranquility and noise events must be in place to enable the difference to be accessed as aircraft noise is far more intrusive in rural areas where the ambient noise is lower than in urban.

Rural areas continue to be targeted by the government's aviation strategy whereas the reality is that more people fly from urban areas. Government policy is not fair or equitable in the distribution of aircraft noise and it is this imbalance that government needs to address.

- A reduction in health impacts has to be welcomed but only if they are distributed in a fair and equitable manner. Aviation desires for growth must be balanced with the impacts on communities. The law needs to be updated so that action can be taken against aviation as many communities feel helpless to stop the noise/ new noise above their homes and this is leading to concerns about the mental health impact of aircraft noise.
- There needs to be a limit set to the number of aircraft in totality that communities can expect and endure during an hour of operations.
- **Increased Noise** – we welcome the government acknowledgment that wheels and flaps dropped early by arriving aircraft increases noise. We would welcome steps to ensure pilots are educated/ fined for this act as part of a noise action plan to reduce noise.

We also welcome action for best practice of airlines with departure procedure, track keeping and staying higher for longer CDA to reduce noise on the ground.

- Noise caps, noise assessment and Noise Action Plans, a Defra requirement, are only as good in how they are enforced. Most are simply 'words' that facilitate a tick box industry requirement which in reality gives little comfort to residents that noise will actually be reduced especially when growth is desired by aviation. There needs to be firm targets which are met and penalties if not met.
- The averaging of noise is not how communities hear noise. Metrics to noise events has to be welcomed but does not go far enough in evaluating the far-reaching impact of aircraft noise. Any calculation of 'totality of routing/number of planes, severity of noise/ procedure of flight, and any respite afforded' as WebTag works on a 'numbers game' leaving rural areas vulnerable. WebTag is also reliant upon, as is CAP 1731, airport noise monitors and these are not plentiful at airports or placed in sensitive areas and so data and findings must be questioned.

We recommend that SocialValueX be a considered addition to any calculations over airspace changes, allowing for a value to be placed on rural lifestyle, expectations and wellbeing.

- **All airports should carry a night ban** of 7 hours as advised by World Health Organisation October 2018, but this should not lead to the shoulder periods being impacted by greater movements as these are periods of time when communities are most vulnerable to the health impact of aircraft noise***.

CAP 1731 - Chapter 2 states that the CAA survey of 2017 found the following:

1) Aircraft numbers increasing without being able to have a say; 2) Aircraft flying lower than they should; 3) Flights early in the morning; 4) Flights late at night; 5) My local airport isn't doing enough to manage noise; and 6) Aircraft flying where they shouldn't be flying.

The CAA produce many useful and informative reports, such as CAP 1731, CAP1498, but these are overlooked when it comes for formalising government policy or airspace changes as they do not have to be taken into consideration when decisions are made.

This report, similar to the green paper, works on the basis that aircraft will be become quieter, whilst ignoring the fact that meaningful changes to the noise levels of aircraft are many years away. In addition to this the reduction in tolerance to aircraft noise and frequency of flight over the same communities (concentrated flight paths) appears to be given little influence in the debate and findings. This attitude we find is unsustainable and simply seeks to facilitate growth of aviation at any price without concrete evidence or plans to ensure noise will be reduced.

The report suggests a land use policy to prevent more homes being built inside the 57Leq contour and yet aircraft noise impacts outside of this noise metric so is the CAA recommending that houses be predominantly built outside of LOAEL?

As airports are permitted to grow the majority of workers seek to live close to any airport due to shift work, zero hour contracts, lack of public transport 24/7, and the unsociable hours that airports operate. This means that it is inevitable that an influx of more homes will be placed inside the 57 Leq (Land permitting) as public transport costs/ lack of public transport means most workers can't afford to travel to work by public transport and are forced to drive adding to the burden. Schemes offered by airports as mitigation to reduce carbon and pollution such as ride a bike to work, car share, are gimmicks that airports use to meet policy requirements when seeking growth. For example Gatwick Airport seeks to increase car travel to the airport by building new robot car parks to accommodate more cars.

Causing Blight of Homes – The government's suggestion would potentially blight homeowners' to potential house buyers and trap them under aircraft noise that they can not control or reduce. This would blight large areas surrounding an airport, far greater number of homes than recognised by the CAA, DfT and the airport as being affected by noise. This is seen to be unfair and would devalue people's homes considerably.

This may not be the case in urban areas such as London that benefit from an airport city/town location but it would have a major impact on rural areas that are partly valued for tranquility and outdoor life expectations.

Air Quality

Aviation has ramifications on the air quality and must not be treated, as is current, in isolation to the airport, For example Gatwick declare itself as carbon neutral but ignores the far reaching decline in air quality it causes due to the greater demand on surface access from Kent, Sussex, Surrey by road, and increases in aircraft movements and an incinerator onsite.

Gatwick also have an incinerator that produces dangerous small particles that are not detected and enter the lungs causing respirator issues. And yet Gatwick is permitted to refer to itself as a carbon neutral airport whilst ignoring the emissions from aircraft and the incinerator.

Air quality of passengers on board flights have shown they are exposed to greater damage from the ozone layer and thus costing our NHS further.

<http://aviationweek.com/business-aviation/cabin-ozone-potentially-serious-poison-high-altitude>

Environmental

In this green paper aircraft noise is 'cast-off' with other environmental statements, seemingly endeavouring to downgrade the concerns over aircraft noise.

The consultation clearly shows concern about meeting carbon targets and openly accepts that aviation will breach these by 2050. The issue is regional airport expansion on top of Heathrow will inevitably cause and escalate far greater issues for climate change than recognised in the green paper.

Master Plans are utilising the government's policy to deal with carbon issues in isolation, seemingly endeavouring to mitigate growth by isolated CO2 savings and yet to be tested schemes for offsetting/ carbon trading. These plans allow airports to expand without the full parliamentary scrutiny a full airport expansion of additional runways would be subject to as such it is a flawed process and one that does not address the true climate change issues thus created.

For example Bristol Airport* details - *Carbon emissions from flights are estimated to rise by 73% from 746 ktCO2 in 2017 to 1,290 ktCO2 with 12 million passengers, an increase of 73%.* This is on top of Heathrow and Gatwick's master plan for 3 runways.

- Aviation growth needs to be restricted (fig 4, pg24) due to unrealistic pricing that UK tourism can not compete against;
- Aviation is the only industry that has not kept pace with modernisation that reduces carbon. ****
- The UK aviation industry is set to risk consuming around half of the total UK carbon budget by 2050, more than double compared to the 1990 levels*.

Carbon Market Watch**** has produced a report that assesses credit providers for the ICAO CORSIA carbon offsetting scheme – which aims to compensate the growth in CO2 emissions from international aviation above 2020 levels, starting in 2021. Offsets should "offset programs will be screened against the eleven new Program Design Elements," (one of which, for example, is: "Program Governance: Programs should publicly disclose who is responsible for administration of the program and how decisions are made." Carbon Market Watch concludes "no program can yet operate in a manner which complies with all the eligibility criteria. Some will need to update and improve certain parts of their protocols or methodologies, but all are hampered by the lack of clarity on international accounting rules to avoid double counting of emission reductions. The present assessment also highlights that the Program Design Elements are not sufficient to exclude credits with no environmental value, and that a rigorous application of the second set of criteria, the Carbon Offset Credit Integrity Assessment Criteria, is necessary and will require analysis of specific methodologies and projects."

Other reports state that carbon trading, offered by ICAO and aviation as the answer to allow growth, the planting of trees in other countries, already tried by some airlines, does not work in offsetting the emissions of aviation. As a rule of thumb, we would have to currently adopt 15 trees per tonne as a conservative estimate, though this may vary from 10 to 15 depending on the site, terrain and rainfall."

<https://carbonneutral.com.au/faqs/>

<https://www.bloomberg.com/news/articles/2019-03-10/airline-pollution-is-soaring-and-nobody-knows-how-to-fix-it>

Climate Change Committee report - Published on May 2nd, from the Committee

on Climate Change (CCC), the Government's official advisers, is recommending that the UK becomes 'net-zero' carbon by 2050. This does not mean there will be no CO2 emissions: "the CCC target is for 'net zero' because some activities, such as flying and farming, will unavoidably produce some emissions in 2050. But these will be balanced by taking carbon out of the air by growing trees or burying CO2 under the ground". The Committee recognises that, because aviation is likely to be largely dependent on kerosene for some decades to come, it will not be able to decarbonise in the way most other sectors will. But it does expect that the cost of flying will need to rise if aviation is to reduce its emissions.

Read the full report:

<https://www.theccc.org.uk/wpcontent/uploads/2019/05/Net-Zero-The-UKscontribution-to-stopping-global-warming.pdf>

- Productions of aviation biofuel will likely need to be in conjunction with carbon capture and storage (CCS) to be competitive with competing uses for biomass (e.g. in industry, electricity generation, or hydrogen production). We see this as non sustainable as many industries look to the similar medium to replace conventional fuels, creating yet another drain on production of alternative fuels. The number of cars on the road, electric, petrol or diesel, will still cause congestion on inadequate road systems.

Electric, hybrid, combination of electric aircraft will all have a noise impact and this is not known to be more or less compared to today's fleet and so no assumptions should be made by government that this will be a positive move to reducing noise.

- The ever-increasing number of aircraft in the air removes any CO2 savings (aviation accounts for 7% of UK greenhouse gases and it will be 25% by 2050); CORSIA – is unrealistic if we are totaling global impact of aviation growth.
- Light pollution by airports and aircraft is ignored by the paper and yet adds to the carbon footprint for airports and aircraft;
- Investment should be made in rail and alternative forms of travel that are far more environmentally friendly.
- Fuel duty and VAT must be charged on aviation as the exchequer is missing out on over £10bn a year^{**}; Air Passenger Duty (APD), generates £3bn a year^{**}, does not compensate for this loss of revenue and is levied at too low a rate to curb demand for flying.

Chapter 4 Support Regional Growth and Connectivity

The Ramifications of Airport Growth

It was reiterated In Future of Aviation 2017 that the long-standing requirement that airports should pay for the development of surface access of their own growth plans, stating: *'Where the scheme has a wider range of beneficiaries, the government will consider the need for additional public funding on an individual basis.'*

In Future of Aviation 2018 this statement has been omitted and replaced by a couple of detailed paragraphs proposing that the responsibility for improved infrastructure fell to Network Rail and Highways England to work with the aviation industry to provide surface access provision for airport growth.

This Aviation Green Paper 2019 fails to include any directive policy concerning the ramification on surface access resulting from airport growth.

This is unacceptable as there is a danger that the taxpayer will end up paying the bill of aviation growth. We are of the strong view that the provision in the 2017 Aviation Paper should be reinstated in the current green paper.

Local authority 106 agreements do not go far enough in addressing the escalating financial burden of airport growth.

Therefore the soft and hard infrastructure ramification of airport growth is being ignored through this proposed policy; this is not sustainable and lacks 'joined up thinking' by the Department for Transport and the Government.

With airport growth/ expansion comes the demand for mass housing, industrial parks and infrastructure threatening green land with concrete, as a result urbanising rural areas to the detriment of the countryside.

- **Compensation** is imperative and must include areas beyond LOAEL. We welcome the acknowledgement of the reduction in decibel impact to qualify for insulation to 60 decibels but this would entail a large increase in planes/ noise, and insulation does not assist rural areas that expect an outdoor lifestyle. There must be full compensation of house value for anyone that has been impacted by flight path changes up to 7,000ft in the last decade due to PRNAV being introduced.
- **Airport Master Plan – (4.34)** Master Plans purely seek growth of an airport to benefit stakeholders and not the local communities via the back door in Gatwick's case.

Airports are shopping malls with a runway as such takes money from the high street with a trapped audience for 2 hours. Airports take money out of the local community and UK economy as more people fly out of the UK than into the UK, figures as previously stated in this response.

Master Plans are taking environmental damage, carbon emissions, of individual airports growth in solation to the full UK picture. This means they are ignoring the overall state of emergency the UK faces with carbon emissions targets being breached instead of reducing.

- **Work Force** - We note that as aviation seeks to computerise air traffic control, security, baggage handling, check-in and piloting of aircraft, therefore fewer jobs are to be created by an airport. Jobs created will be to service the airport and work in the shopping malls, often zero hour contracts and seasonal. (Pg 99)

- The DfT has included aerospace in its job figures, which unfairly drastically inflates employment projections, so has widen the profile and so direct comparison can not be made year on year. In fact from 2002 and 2008 government figures, jobs have declined in aviation.

Chapter 6 Ensure a Safe and Secure Way to Travel

Aviation and this paper seem to have forgotten that those on the ground are also vulnerable to aircraft safety issues. Airport and aircraft safety must be paramount, not just for those that chose to fly, but also those on the ground that are flown over.

Chapter 7 Support General Aviation

- **Helicopters and private aircraft** – CAGNE stress that policy needs to be strengthened on this form of transport as we see it growing uncontrolled with present legislation. Helicopters especially as the roads become more and more congested as these create significant noise especially in the countryside.

Both helicopters and drones cause unnecessary noise impact on communities.

Chapter 8 Encourage Innovation and New Technology

- Any noise benefits from new aircraft currently are not necessarily guaranteed to continue as only new fuel technology is being invested in whilst noise is not a consideration currently in the process.
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We raise major concerns that new technology and the DfT's announcement on the 31st May will seek to remove noise preferential routes (eg Gatwick's modernisation of airspace design principles); these have been in place at designated airports to safeguard communities, to predict flight paths, if these are removed they will be subjecting a vast area of communities to first time noise. Other procedures that are declared as reducing noise, in fact, do not and so we question them being used by the government and industry to seek growth through failed noise abatement procedures such as CDO, CCO, NADP1 and 2, etc.

And suggested noise reducing aviation initiatives, Continuous Climb Operations seem to burn more fuel than what it saves so increasing NOX.

- Productions of aviation biofuel will likely need to be in conjunction with carbon capture and storage (CCS) to be competitive with competing uses for biomass (e.g. in industry, electricity generation, or hydrogen production). We see this as non sustainable as many industries look to the similar medium to replace conventional fuels, creating yet

another drain on production of alternative fuels. The number of cars on the road, electric, petrol or diesel, will still cause congestion on inadequate road systems.

Electric, hybrid, combination of electric aircraft will all have a noise impact and this is not known to be more or less compared to today's fleet and so no assumptions should be made by government that this will be a positive move to reducing noise.

- Airlines, due to the tight financial margins by which they operate, have a lack of additional funding for the predicted investment in alternative fossil fuel aircraft or the desire to spend to reduce aircraft noise.

* <http://www.bristolairportwatch.org.uk/planning-application>

**http://www.transportforqualityoflife.com/u/files/190116%20Curbing%20Aviation_A%20Fair%20Tax%20Package.pdf

*** www.aef.org.uk

⁶ UK Tourism Satellite Account (UK-TSA) 2016, ONS, Table 4:

<https://www.ons.gov.uk/economy/nationalaccounts/satelliteaccounts/datasets/uktourismsatelliteaccounttsatables>

⁷ Travel Trends 2017, ONS, Data for 2016, Tables 2.07, 2.09, 3.07 & 3.09 - which show a tourism trade deficit of £18.2bn in 2017:

<https://www.ons.gov.uk/peoplepopulationandcommunity/leisureandtourism/datasets/ukresidentsvisitsabroad> and

<https://www.ons.gov.uk/peoplepopulationandcommunity/leisureandtourism/datasets/overseasresidentsvisitsstotheuk>

⁸ Ibid and Pink Book, ONS, Chapter 3 Trade in Services, Table 3.2: Passenger revenue – where exports comprise air tickets sold by UK airlines to foreign residents and imports comprise air tickets sold by foreign airlines to UK residents. The net deficit in 2017 was £2.4bn:

<https://www.ons.gov.uk/economy/nationalaccounts/balanceofpayments/datasets/3tradeinservicesthepinkbook2016>

⁹ Travel Trends 2016, ONS, Table 2.09:

<https://www.ons.gov.uk/peoplepopulationandcommunity/leisureandtourism/datasets/overseasresidentsvisitsstotheuk>

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid

¹⁹ CAA Airport Statistics 2017, Table 12.1:

<https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-Airport-data/Airport-data-2017/>

²⁰ Ibid, excludes Hong Kong.

****<https://carbonmarketwatch.org/wp/wp-content/uploads/2019/03/First-class-or-economy-an-assessment-of-credit-providers-for-the-aviation-offsetting-scheme-2.pdf>

****<https://www.ft.com/content/61cac1e8-5fa2-11e9-a27a-fdd51850994c>

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