

Aviation Green Paper

Response from HACAN East

HACAN East gives a voice to residents under the London City flight paths. We were set up by our sister organisation, HACAN, but are now an independent organisation with a separate management committee.

Preface

Everything we write at the moment is coloured by the fact that we are condemned to live under concentrated flight paths.

London City announced in March 2019 that it would be looking again at its concentrated flight paths and will follow the new CAP1616 process set out by the CAA in doing so.

We welcome this because, after minimal consultation, London City concentrated its flight paths in 2016.

No respite was offered or received.

Noise ghettos have been created.

Of course, London City points to the fact that concentration has meant a large number of people are no longer overflowed.

But it has been at our expense.

And it is not as if we are small in number.

These are the numbers under the concentrated flight paths
[http://publicapps.caa.co.uk/docs/33/CAP1692C_ModuleC_FinalV3\(P_LINKS\).pdf](http://publicapps.caa.co.uk/docs/33/CAP1692C_ModuleC_FinalV3(P_LINKS).pdf)

Number of people overflowed by arrivals:

Under 4,000ft	331,000
4,000 – 7,000ft	72,000
Total under 7,000ft	403,000

Number of people overflowed by departures:

Under 4,000ft	416,300
4,000-7,000ft	115,100
Total under 7,000ft	531,400

There is a smaller number impacted by both arrivals and departures but the CAA has not done that calculation.

We are currently disturbed by the noise. The prospect of further growth fills us with despair. Unless a decision is taken to bring more/changed flight paths to allow respite, we will bear the full brunt of that growth.

Future Growth at London City

Future growth is on the cards.

1. Robert Sinclair, the chief executive of the airport, told the Press Association that the airport is considering an application to raise limits on flights and passenger numbers: <http://www.itv.com/news/2018-07-09/london-city-airport-may-seek-permission-for-more-flights/>. The Master Plan, to be released this summer, will make things clearer.
2. The Green Paper expects growth to take place at most airports.

Growth at London City would have a huge impact. There is a considerable amount of house-building taking place in East London. Already, according to London City's Noise Action Plan 2018-2023, 75,000 people are within the 55Lden contour; that is more than any airport except Heathrow and Manchester.

We recognise the value of the aviation industry both to the UK economy and to people who want to fly on holiday or to visit family. Improved connectivity, particularly to and from the growing Asian economies will benefit the UK economy but further growth at City Airport beyond the existing 111,000 annual cap would not be acceptable to us. Already, a town the size of Burnley is overflowed by City Airport planes.

National Growth

Growth at many airports will be problematic. Therefore, nationally, airports should only have a 'licence to grow' if they can show they can meet tough local noise and air pollution targets and the national climate change and biodiversity targets. Demand could be managed through fiscal measures such as a Frequent Flyers Levy which would target the small number of frequent flyers, who are driving much of the growth, without stopping people flying off on their summer holidays or damaging business.

Noise

There is a lot in the Green Paper on noise which we welcome

London City has pledged that no new aircraft will be noisier than the noisiest planes currently in operation. This links in with the main finding of the CAA report which accompanied the Green Paper assessing future noise levels. The CAA found that noise contours would shrink at UK airports by 2050 because aircraft would be less noisy.

Table 6.2 (b): Forecast analysis - summary of population exposure (including LHR NWR), Scenario: HIGH

Metric	Level	Scenario: High Population Exposure					% change 2016-2050
		2016	2025	2030	2040	2050	
Average summer day LAeq16h	>51	1,662,800	1,625,100	1,637,800	1,528,800	1,553,500	-0.6%
Average summer day LAeq16h	>54	783,500	804,000	846,500	771,800	798,600	+1.7%
Average summer night LAeq8h	>45	1,234,100	1,209,000	1,250,200	1,188,200	1,246,900	+1.0%
Average summer night LAeq8h	>48	648,600	595,600	580,800	552,400	597,700	-7.8%
Average annual 24h Lden	>50	2,471,500	2,581,900	2,888,700	2,662,900	2,739,700	+10.9%
Average annual 24h Lden	>55	948,400	961,000	1,004,400	920,200	952,600	+0.4%
Average annual 8h Lnight	>45	1,109,200	1,083,300	1,103,800	1,044,600	1,093,800	-1.4%
Average annual 8h Lnight	>50	321,600	285,500	306,700	297,200	326,500	+1.5%
Average summer night 8h N60	>5 events	2,143,400	2,114,800	2,301,200	2,214,500	2,321,200	+8.3%
Average summer night 8h N60	>10 events	1,462,900	1,446,700	1,616,400	1,574,600	1,638,200	+12.0%
Average summer day 16h N65	>5 events	2,609,300	2,719,500	2,659,300	2,499,900	2,354,600	-9.8%
Average summer day 16h N65	>10 events	1,965,400	2,122,600	2,143,400	1,942,700	1,951,600	-0.7%
Average summer day 16h N70	>5 events	1,062,100	1,113,200	995,200	859,500	815,600	-23.2%
Average summer day 16h N70	>10 events	838,700	878,000	793,800	674,300	657,600	-21.6%
AIE(70)	> 5 events	67.1	68.0	71.8	74.2	79.1	+17.9%
AIE(70)	> 10 events	79.6	81.3	85.0	88.9	96.2	+20.9%
PEI(70)	> 5 events	71,170,000	77,414,700	85,001,400	76,885,900	82,111,700	+15.4%
PEI(70)	> 10 events	69,591,900	75,735,500	83,538,100	75,572,000	80,995,400	+16.4%

An earlier CAA chart from the same report showed the number of aircraft would rise. It is the number of planes passing overhead which is the main concern of our supporters.

Therefore, we welcome the clear statement in the Green Paper that the number of planes overhead can be the big problem:

“the Government recognises that statistics showing past and future improvements in noise do not necessarily match the experience of some people living under flight paths, for whom the benefits of quieter aircraft can be cancelled out by greater frequency of movements or the effects of concentrated traffic associated with more accurate navigation technology.”

We welcome, too, the recognition in the Green Paper that people can become annoyed at lower levels than previously thought and the subsequent move towards the use of the 54 and 51 decibel contours rather than the 57 contour as ‘the onset of community annoyance.’ This would have implications for London City. Over the years and under the terms of its planning permission, it has a credible record in putting in place measures to benefit people living within the 57 decibel contour. But it is only recently that it has recognized the problems that exist further afield. The new contours will help focus its attention on a wider area. We note the Department of Transport will also be assessing the new WHO noise guidelines. This should be done quickly so that, where accepted, they can frame Government policy.

We also welcome the setting up of ICCAN (Independent Commission on Civil Aviation Noise). Our belief is that, if ICCAN had been in place in 2015, London City would not have got away with what we regard as a sub-standard consultation process. Therefore it is particularly welcome ICCAN will have as part of its role *“how the needs of affected communities can best be served in the airspace modernisation programme”*.

The specific measures in the Green Paper to deal with noise are broadly welcomed:

- **A new objective** to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise. Welcome but needs fleshing out.
- A new **national noise indicator** to track the long term performance of the aviation sector in reducing noise. Welcome but specifics are required.
- **Noise caps** to become routine at airports where planning permission is given for growth. Welcome.
- All major airports to draw up a **noise reduction plan** – welcome but *noise reduction* would need to be defined.
- The introduction of **multiple flight paths** to provide **respite** (with the decision down to individual airports). There may be airports, or particular flight paths, where respite is not the best option but, if an airport is to reject it, it should be asked to be clear why it is doing so. There may be a role for ICCAN in assessing this.
- To reduce the current point where **noise insulation** has to be offered from the 63dB LAeq 16hr contour to the 60dB LAeq 16hr contour. This is welcome.
- To require all airports to review the effectiveness of existing **compensation schemes**. This is welcome, particularly the requirement to look at “*whether levels of contributions are affecting take-up.*” We believe this could well be the case.
- The Government or ICCAN to issue new guidance to airports on best practice for **noise insulation schemes**, to improve consistency. London City provides more comprehensive noise insulation schemes than many airports but it is important there is consistency across the country. The guidance should also include levels of insulation that should be offered to people within the 54 and 51 decibel contours.
- For airspace changes which lead to significantly increased flights overhead, a new minimum threshold of an increase of 3dB LAeq is introduced to be eligible for **compensation**. Welcome.
- Provide more **information** to people moving into an area under a flight path. Welcome.

- The Green Paper's proposal to promote **best practice** in operating procedures, giving the CAA the duty to require information on the practices used. Important, practical, welcome
- Introduce a new power to direct airports to **publish information**. Welcome

In a number of our comments we have asked for more detail. We understand that more work has been done on the specifics. We welcome this as the detail of many of these measures will be so important.

Climate Change

The Green Paper acknowledges that, despite the progress that has been made in cutting emissions across the economy as a whole, more needs to be done and that “aviation’s share of emissions is likely to continue to increase as other sectors decarbonise more quickly. This means that aviation could represent 25% of the UK’s greenhouse gas emissions by 2050.”

The recent report from the Committee on Climate Change (CCC) recognises that, because it is likely to be largely dependent on kerosene for some decades to come, aviation will not be able to decarbonise in the way most other sectors will. It accepts that, even with the use of some hybrid/electric aircraft from the 2040s, aviation “would still result in emissions of 31 MtCO₂e in 2050.” It says: “This is because a fully zero-carbon plane is not anticipated to be available by 2050, particularly for long-haul flights which account for the majority of emissions.” The CCC in its report says this would allow for “a 60% increase in passenger demand above 2005 levels by 2050 (demand is currently around 30% higher).” This would allow for a third runway to be built at Heathrow but, if that happened, restrict growth elsewhere. The 60% increase in passenger numbers is also a lot less than the 90% increase the Department for Transport is predicting.

We welcome the commitment in the Green Paper to meet the target of reducing aviation’s climate emissions to their 2005 levels by 2050 but suggest that the DfT’s forecast 90% will need to be cut through demand management in the light of the Committee on Climate report.

The Green Paper sets out three main measures to tackle CO₂:

1. A “**long term vision and pathway** for addressing UK aviation’s impact on climate change” which will be kept under review to take account of new technological, improved operational efficiencies, market-based measures, sustainable fuels as well as demand management and behaviour change.

This is welcome but with some caveats. A clearer definition is needed of what is meant by “sustainable fuels” and whether they can be supplied on the scale the industry would require. More information is also required on what the impact would be on future demand of different “demand management”

measures. This is important because a number of airports have plans to grow. Government needs to be in a position to know impact the individual and cumulative growth of airports will have on CO₂ emissions in order to know how much growth to permit. The climate change impacts of expansion need to be enshrined as a legitimate consideration at local airport planning inquiries. Government needs also to be clear what are the options for, and likely impacts on, CO₂ emissions of “behaviour change” and to be clear whether it believes there is the need to introduce measures – such as cheaper rail travel or higher taxes on aviation – to effect behavioral change.

2. “to negotiate in ICAO (the UN body responsible for tackling international aviation climate emissions) for **a long term goal for international aviation** that is consistent with the temperature goals of the Paris Agreement”

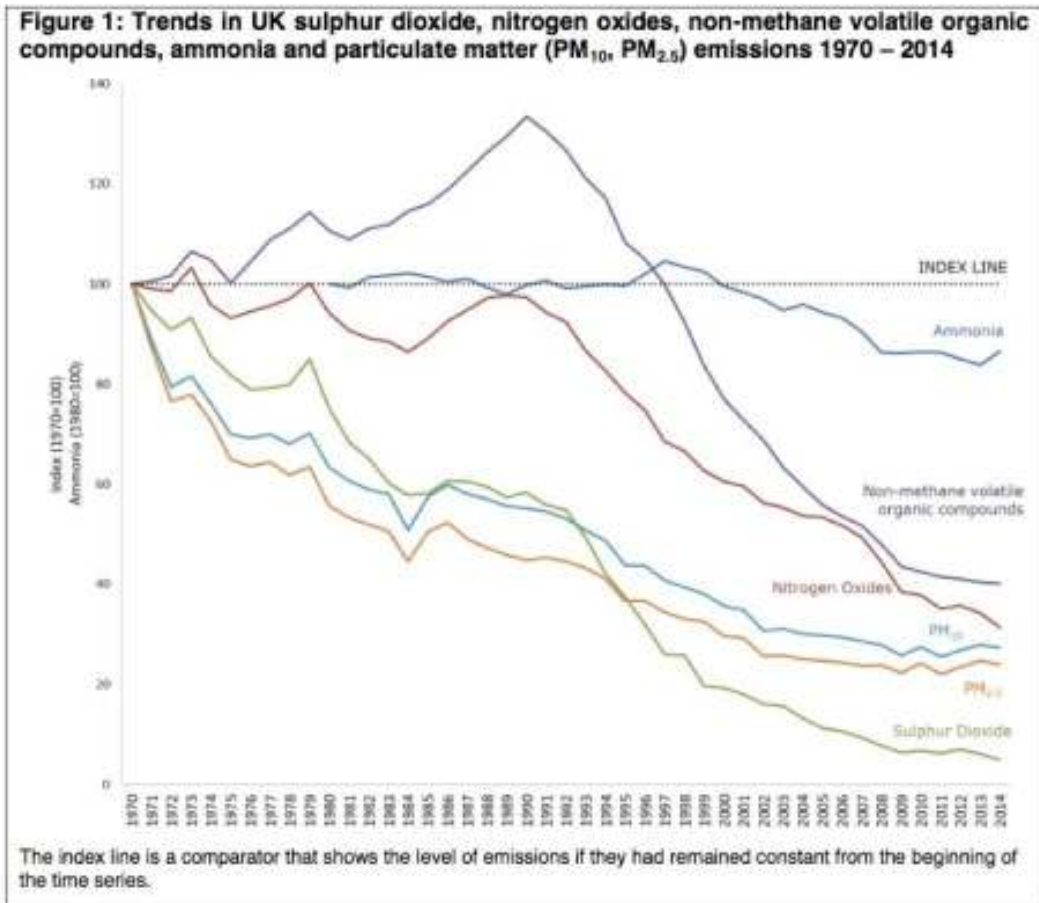
This is the right thing to do but will not be easy! ICAO is a slow-moving body. And that could present a real problem in light of the advice from both the last IPCC report and the recent Committee on Climate Change (CCC) report that urgent action is required. The CCC also suggested that for aviation (and shipping) increased ambition and stronger levers will be required. The CCC further advice later this year should help to clarify this.

3. “to support and strengthen the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).” This is an international scheme for aviation to off-set its emissions.

Off-setting is fraught with danger. Its effectiveness is difficult to monitor, especially if it is abroad. And its record in reducing overall emissions is not good. The Öko-Institut (2016) investigated the effectiveness of existing offsetting projects for the European Commission and concluded that most likely only 2% of United Nations offset projects resulted in an actual additional emissions reduction. See: <https://tinyurl.com/ybk7xybl> .

Air Pollution

Levels of air pollution have steadily fallen over the past 40 years. The UK is currently compliant with ambient air quality legislation for most pollutants, the exception being nitrogen oxides although emissions of nitrogen oxides have fallen by almost 27% between 2010 and 2016. However, we have become more aware of the health impacts of air pollution.



The Green Paper “recognises the need to take further action to ensure aviation’s contribution to local air quality issues is properly understood and addressed.”

The proposed DFT actions are:

- to “improve the monitoring of air pollution, including ultrafine particles (UFP), in order to improve understanding of aviation’s impact on local air quality.” This is welcome as there is some research to suggest that air pollution from planes may not just be confined to the area close to the airport. There is also emerging research to suggest UFP may be a larger problem than previously thought.
- to “require all major airports to develop air quality plans to manage emissions within local air quality targets. This will be achieved through establishing minimum criteria to be included in the plans.” Welcome.

We haven’t said much about surface access in our response but the fact that airports, and particularly Heathrow, can be significant generators of road traffic, reinforces the need for airports to be well served by good public transport in order to deal with air pollution levels.

New Technology

We welcome the Green Paper's proposals to promote new technology: *"The government proposes to work with international partners to develop a more agile international regulatory framework that is based on performance-based standards. It will not be possible for global standards to keep pace with rapid developments in technology if they are overly prescriptive. The UK recognises the need to pay due regard to existing governance, but the government believes that the UK can provide additional support to ICAO in encouraging more agile processes for standard-setting, particularly in relation to new and emerging technology."*

History shows that new technology can and does often surprise us, providing solutions to problems which may currently appear very difficult. However, we would make two cautionary points. The prospect of distant technological improvements should not diminish the need to find shorter-term solutions. And in-depth assessment needs to be made of what the new technology can actually deliver as all industries, including aviation, have a tendency to over-claim the benefits.

We would stress also that, in developing new technology, priority should be given to technology which deals both emissions *and* noise. Does this mean, for example, prioritising R & D investment in hydrogen rather than electric planes?